

**Representor Number** 14

**Representation Number** 5355

**Policy/Chapter/Paragraph** Appropriate Assessment

Internal Ref#

1

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

As no revised AA has been produced, it is not possible to evaluate the Plan's overall soundness. This document is vital in ensuring that the policies in the Core Strategy will not adversely affect Natura 2000 sites and other protected features. Where an adverse effect is noted the number of viable houses that may be constructed should be re-assessed.

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**Representor Number** 60

**Representation Number** 5708

**Policy/Chapter/Paragraph** Portrait of the Borough

Internal Ref#

2

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

There is insufficient weight given in the economic section to port, oil and gas, renewable energy and tourism industries.

---

**Representer Number** 2 **Representation Number** 5293

**Policy/Chapter/Paragraph** Portrait of the Borough

Internal Ref#

2

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure is pleased to note that page 6 of the consultation document recognises that "Tourism is very important to the Borough's economy and Great Yarmouth is one of the UK's most popular tourism destinations". Bourne Leisure considers that the importance of tourism to the borough should be fully reflected throughout the Core Strategy and that key policies should support the enhancement of existing tourism facilities/accommodation, as well as encourage the provision of new tourism facilities/accommodation. Bourne Leisure then accepts the recognition on page 7 of the importance of the borough's environment, including the coastline, and notes that recognition is also given to the threat from coastal erosion and flooding. The Company would however emphasise the need to ensure an appropriate and balanced approach in the Core Strategy to flood risk considerations and coastal erosion, in the context of wider benefits of continuing the use of the coast for tourism. Bourne Leisure would also emphasise the need to allow operators to undertake/fund necessary coastal defence works to protect their property.

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**Representer Number** 38 **Representation Number** 5508

**Policy/Chapter/Paragraph** Portrait of the Borough

Internal Ref#

2

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Policy CS5 states small villages will experience little development over the planned period and prioritised to support affordable houses. So why does GYB still pass [removed] for permission.

**Representor Number** 45 **Representation Number** 5568

**Policy/Chapter/Paragraph** Core Strategy Vision, Objectives

Internal Ref#

3

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

The spatial objectives set out in the Core Strategy cover a wide range of issues and are for the most part considered consistent with the sustainable aims and objectives of the East of England Plan and as such are welcomed.

---

**Representor Number** 14 **Representation Number** 5356

**Policy/Chapter/Paragraph** Core Strategy Vision, Objectives

Internal Ref#

3

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports "protecting and enhancing the local environment and tackling climate change," but would suggest that 'biodiversity' should also be included for protection and enhancing.

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**Representor Number** 2 **Representation Number** 5295

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

With reference, however to the statement on page 9 that "the natural environment, countryside and coastline will be protected and enhanced", the Company's view is as stated above i.e. that there should be a balanced approach to such protection and enhancement, which allows each proposed development to be considered on its own merits and with reference also to economic considerations.

**Representor Number** 52 **Representation Number** 5605

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We feel that the Council's vision has a greater emphasis on social and economic factors in comparison to the environmental issues. In order to achieve truly sustainable development there must be equal weighting to all three factors, as recognised by Planning Policy Statement (PPS) 1 and the Government Strategy 'Securing the Future'

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**Representor Number** 56 **Representation Number** 5674

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation**

**Surname** Rogers

**Representing**

***Summary of Representation***

Planning should not be allowed on flood plain. History has shown us that flooding of these areas has a high probability resulting in property damage and misery for residents in flooded properties.

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**Representor Number** 52 **Representation Number** 5606

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In particular we are concerned that flood risk has not been referred to within the vision. A general reference needs to be made with regards to tackling climate change and adapting to the increased risk of flooding across the Borough. Furthermore, flood risk needs to be acknowledged as a challenge to the redevelopment of the URC areas in paragraphs 2 and 3 of the vision.

**Representor Number** 52 **Representation Number** 5607

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are pleased to note you have included the protection and enhancement of the natural environment and aim to create an ecological network. This should include the creation of new green spaces which will be especially important in areas of urban intensification/ expansion when ecological connectivity is often lost. These spaces can be multifunctional also contributing to flood risk management, pollution prevention, recreation and surface water management.

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**Representor Number** 14 **Representation Number** 5358

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB is pleased that the Council has plans to protect and enhance the natural environment, and to create new habitats to support biodiversity and allow adaptation to climate change.

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**Representor Number** 2 **Representation Number** 5294

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

In relation to the Vision for Great Yarmouth, Bourne Leisure strongly supports the statement on page 8 "The borough's tourism industry will be all year round and vibrant"

**Repositor Number** 5 **Representation Number** 5325

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

We note that you have made the Spatial Vision more concise. PLC continues to support this vision and in particular, the second paragraph where it lists that comprehensive regeneration of the town will be delivered through, among other things, new leisure offerings. However, we are surprised that specific reference to tourism is not included within this paragraph, given its importance to the town's economy (it was referred to in 'economy' section in the previous CSPO). We therefore request that a reference to new tourism development is also included in this sentence.

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**Repositor Number** 52 **Representation Number** 5608

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are also supportive of your vision to minimize the use of natural resources but feel it could be strengthened to reflect the Government's policy aims with regards to achieving zero carbon development by 2016. Reductions in waste production and increases in energy and water efficiency should also be mentioned.

**Representor Number** 14

**Representation Number** 5357

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The amount of development proposed with the Strategy must be assessed by an AA. Proposals within the Core Strategy should be considered individually and the overall impact of the Strategy should be assessed, followed by an assessment of in-combination effects with the Plans and projects in neighbouring Councils.

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**Representor Number** 60

**Representation Number** 5709

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

In the vision I am concerned that the prioritisation of the 1st East areas is not yet reflected.

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**Representor Number** 5 **Representation Number** 5326

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

In the third paragraph of the Spatial Vision, we support references to the sustainable waterfront (we presume this also means the seafront) redevelopment of South Denes as the proposals for The Edge fit within this. Indeed, in the same paragraph, we agree that redevelopment of the waterfront will create a "radical change to the economic structure and provide strong sustainable links to the waterfront, town centre, the Broads, seafront and the surrounding settlements". We consider that The Edge will act as a catalyst for transforming the tourism industry in the town, and will provide a strategic gateway between Eastport UK and the Golden Mile when the third river crossing is in place.

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**Representor Number** 3 **Representation Number** 5312

**Policy/Chapter/Paragraph** Core Strategy Vision - Great Yarmouth Borough in 2021

Internal Ref#

4

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

The vision could still be enhanced by extending the description of Great Yarmouth's Strategic European Location, integrated transport system, ports, tourism and traditional industries.

**Representer Number** 14

**Representation Number** 5367

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO10) The RSPB supports the policy to protect and enhance the natural environment and improve site connectivity. We commend the Council extends these measures to non-statutory sites. Any increased access must be carefully managed to ensure that sites (statutory and non-statutory) are not adversely affected by increased disturbance.

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**Representer Number** 52

**Representation Number** 5609

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We feel objective SO9 is dealing with two separate but linked subjects that would be better split into two objectives – one for climate change and one for flood risk/ coastal erosion. The first should focus solely on minimizing and mitigating the impacts of climate change and providing sustainable development. This would be a broad objective which would cover a number of issues such as flood risk, sustainable drainage, energy and water efficiency, sustainable construction, etc and would be supported by RSS 14 and PPS 1. The second should focus solely on flood risk and coastal erosion which are two big environmental issues affecting your Borough.

**Representer Number** 14

**Representation Number** 5360

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO2) The RSPB believes that visitor access to the environment is important, and provides a valuable contribution to the local economy, but increased access must be sensitive to the conservation interests of the area. Increased, uncontrolled or inappropriate disturbance from higher visitor numbers could lead to deterioration in the condition of designated sites. The risk of increased recreational disturbance to SPAs and SACs will trigger the need for screening for an AA of their likely significant effects. An access management plan will also need to be produced.

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**Representer Number** 60

**Representation Number** 5710

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

The Sustainable Community Strategy Aims 3.8 and 3.9 which relate to infrastructure are not included in this table.

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**Representer Number** 38

**Representation Number** 5507

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

No mention of quality. Also adaption to climate changes.

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**Representer Number** 52

**Representation Number** 5610

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In line with our comments on the spatial vision, objective SO8 could also be expanded and strengthened to set a standard for zero carbon development. It should also make reference to energy and water efficiency as well as minimization of waste.

---

**Representer Number** 38

**Representation Number** 5509

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

SO9: This has not been done yet.

**Representer Number** 38

**Representation Number** 5510

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

SO10: This should include Winterton.

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**Representer Number** 14

**Representation Number** 5366

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO9) The RSPB supports the Council in considering policies that facilitates the Borough's adaptation to climate change, providing that measures are sustainable and maintain a focus on protecting and enhancing biodiversity.

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**Representer Number** 14

**Representation Number** 5365

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO8) The RSPB supports policies that promote sustainable resource use.

**Representor Number** 14 **Representation Number** 5364

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO7) The RSPB supports policies that encourage the development of greater use of public transport, walking and cycling.

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**Representor Number** 14 **Representation Number** 5363

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO6) The RSPB is supportive of renewable energy projects providing that adverse impacts upon wildlife are avoided by appropriate siting and design.

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**Representor Number** 52 **Representation Number** 5611

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Furthermore we consider the issue of water quality to be a significant environmental issue for your Borough due to the industrial nature of much of the land planned for regeneration. We would recommend you mention this issue as either a new objective or within an existing one with wording along the lines of 'To seek improvement to water quality and reduce pollution to the water environment'.

**Representor Number** 14 **Representation Number** 5361

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO4) The RSPB would support a policy that presumes against development being directed towards Greenfield sites.

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**Representor Number** 14 **Representation Number** 5359

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO1) The RSPB supports the Councils approach to be focused on 'brownfield' sites. A caveat to this though, is the importance that brownfield sites may have in supporting biodiversity within urban areas. This point is reflected in paragraph 13 of PPS9- Biodiversity and Geological Conservation, which states "where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities, together with developers, should aim to retain this interest or incorporate it into any development of the site." For example, Canvey Wick in Thames Gateway was the first brownfield designated as a Site of Special Scientific Interest (SSSI) for its invertebrates. The key issue for the RSPB is that biodiversity should be protected and enhanced wherever it is found, in order to deliver national and international commitments.

**Representer Number** 2 **Representation Number** 5296

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure strongly supports Strategic Objective 5 to retain and enhance Great Yarmouth's tourism offer. This is consistent with Government guidance which recognises the importance of tourism to the economic, social and environmental well'being of an area (CLG Good Practice Guide "Planning for Tourism" (May, 2006)). This government guidance also notes at paragraph 2.5 the broader benefits that tourism can bring to local communities, for example, in terms of regeneration and providing a catalyst for growth and in terms of additional revenue to support and enhance local services and facilities and secure the retention and upgrading of public services. In addition, the economic benefits of tourism can help to sustain and improve the natural and built physical environment. The Company considers that all of these attributes in relation to tourism should be explicitly recognised fully throughout the emerging Core Strategy and that they should be referred to SO5 or other relevant strategic objectives (eg. SO1 and SO12).

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**Representer Number** 2 **Representation Number** 5297

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Whilst Bourne Leisure supports the principles of this objective, the Company would point out the importance of the private car to many visitor trips.

**Representer Number** 2 **Representation Number** 5298

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

In regard to SO9, whilst the Company accepts the need to reduce flood and coastal erosion risks, the need to consider each proposal for development on its merits must again be emphasised, taking into account the characteristics and vulnerability of the proposed use and the location etc. of the current use, if its expansion or extension is proposed. In particular, policies should allow for the provision and funding of appropriate coastal defence works by landowners and tourism site operators

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**Representer Number** 2 **Representation Number** 5299

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure accepts SO10, subject to there being a balanced approach to this objective in the context of other objectives e.g. relating to the economy, and that each development is considered on its own merits.

**Representer Number** 53

**Representation Number** 5668

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Somerton Parish Council

**Surname**

**Representing**

### *Summary of Representation*

Strategic Objectives. We consider that these are realistic objectives. Could we suggest that, in S07, the reference to a "third river crossing" be modified to "a third river crossing which preferably incorporates a surge tide barrier". The inclusion of the surge tide barrier as part of the construction of a third river crossing would, we feel; Protect the areas in the Borough that are at risk mainly from tidal flooding, as identified in the Environment Agency indicative flood maps and the Great Yarmouth Strategic Flood Risk Assessment; Protect the whole of The Broads area including the Internationally Important Wetland Sites, from potentially devastating salt water incursion; Prevent a recurrence of the events which took place during the last surge tide event on the 9th November, 2007, namely, the evacuation of residents from vulnerable areas, closure of roads, interruption of business activity, closure of schools, etc; Address in part, any proven rise in sea levels presently associated with climate change predictions; Reassure the Borough's residents and business community, and help attract long term investment into the Borough.

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**Representer Number** 5

**Representation Number** 5327

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

### *Summary of Representation*

We previously commented on Strategic Objective 10 (relating to tourism) and requested that the particular reference to the areas of tourism potential to be exploited be widened to encompass other tourism opportunities in Great Yarmouth including leisure-based activities along the seafront, (instead of solely focussing on outdoor recreation, which it did previously). We note that the Amendment CS PO Strategic Objective 5 (relating to tourism) no longer contains specific reference to areas of tourism potentially to be exploited, and we support this change as it is now all encompassing.

**Representer Number** 14 **Representation Number** 5362

**Policy/Chapter/Paragraph** Strategic Objectives

Internal Ref#

5

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

(SO5) Any increased tourism should respect the nature conservation objectives and interests of the area through the protection of important sites and enhancing the network of green spaces where possible. Key to this will be establishing a detailed access management plan.

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**Representer Number** 14 **Representation Number** 5368

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

As well as being sustainable, development must also ensure that it does not adversely affect the conservation objectives of Natura 2000 sites. This extra requirement should be added into the Spatial Strategy.

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**Representer Number** 14 **Representation Number** 5372

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

With regards to the the key service centres; we support the creation of improved walking and cycling links. We are concerned that new development may encourage additional road infrastructure that may facilitate increased private vehicle use. Efforts should be made to manage additional infrastructure to avoid increases in private car use.

**Representer Number** 5 **Representation Number** 5328

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

We support the spatial strategy as set out on page 14 of the Amendment CS PO and in Policy CS1 and in particular, reference to radical change of the economy by, amongst other things, diversifying into new and emerging sectors, including the tourism cluster based on the resort and leisure roles of the towns. We are particularly pleased that the Amendment CS PO makes reference to the proposal for a Casino in Great Yarmouth. We consider that The Edge 'Large' casino proposal by PLC (which the Council resolved to grant planning permission for in February 2009) will indeed act as a catalyst to transformational change to the tourism economy of Great Yarmouth, as not only will it be the largest single tourism-based investment in the town for the past 25 years, it will bring new high quality tourist facilities which will encourage other tourist operators in the town to aspire to match. It will also make the town's tourism economy less reliant on good weather, and it will assist many attractions, including PLC's own Pleasure Beach - being East Anglia's largest tourist attraction - on remaining open to visitors throughout the year, thus extending the season and bringing a greater year-round balance to the town.

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**Representer Number** 5 **Representation Number** 5329

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

Great Yarmouth already has a number of casino's issues under the Gaming Act 1968 in the town, and therefore we request that the Amendment CS PO is clear that a 'Large' casino (as defined by the Gambling Act 2005) that is being brought forward which will be transformational to Great Yarmouth's tourist economy. We therefore ask that you add 'Large' to the reference to the new casino proposals for clarity reasons.

**Representor Number** 14

**Representation Number** 5374

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

With regards to smaller villages; The RSPB believes that visitor access to the environment is important, and provides a valuable contribution to the local economy, but increased access must be sensitive to the conservation interests of the area. Increased, uncontrolled or inappropriate disturbance from higher visitor numbers could lead to deterioration in the condition of designated sites. The risk of increased recreational disturbance to SPAs and SACs will trigger the need for screening for an AA of their likely significant effects. An access management plan will also need to be produced. In addition to the need to assess and manage increased visitor pressure, development must ensure that there is sufficient capacity to provide water and maintain water quality to prevent adverse effect to designated sites.

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**Representor Number** 14

**Representation Number** 5373

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB believes that visitor access to the environment is important, and provides a valuable contribution to the local economy, but increased access must be sensitive to the conservation interests of the area. Increased, uncontrolled or inappropriate disturbance from higher visitor numbers could lead to deterioration in the condition of designated sites. The risk of increased recreational disturbance to SPAs and SACs will trigger the need for screening for an AA of their likely significant effects. An access management plan will also need to be produced. In addition to the need to assess and manage increased visitor pressure, development must ensure that there is sufficient capacity to provide water and maintain water quality to prevent adverse effect to designated sites.

**Representor Number** 52 **Representation Number** 5612

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

RSS identifies 'high unemployment, pockets of deprivation and areas vulnerable to tidal flooding events' as being challenges to the delivery of policy GYL1. On page 14 of your draft Core Strategy we note that you only refer to the first two. Given the nature of flood risk in Great Yarmouth it must also be acknowledged.

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**Representor Number** 14 **Representation Number** 5375

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

With regards to the additional housing requirement; if screening of the proposed development and employment growth determines that the Plan may have an adverse affect on Natura 2000 sites, we recommend that the Council discuss this with Natural England and the RSPB as soon as possible.

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**Representor Number** 14 **Representation Number** 5370

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

With regards to the proposed development areas, our primary concerns are with Great Yarmouth, Caister and Hemsby. Development in these areas could greatly increase disturbance to the Great Yarmouth North Denes and Winterton Special Protection Areas (SPA). It will be important to site new development at a suitable distances from the SPA, and an access management plan must be produced to address visitor disturbance to the little tern colony during the summer months.

**Representer Number** 14 **Representation Number** 5371

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

With regards to Great Yarmouth and Gorleston; The RSPB supports the Councils approach to be focussed on 'brownfield sites'. A caveat to this though is the importance that brownfield sites may have supporting biodiversity within urban areas.

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**Representer Number** 14 **Representation Number** 5369

**Policy/Chapter/Paragraph** Spatial Strategy

Internal Ref#

6

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Please see our comments for Strategic Objectives (SO1) above regarding brownfield sites.

Please see our comments for Strategic Objectives (SO2) above regarding increased tourism.

The Plan must be assessed in-combination with other projects that are underway or proposed for the Borough, such as the new port, and Plans and projects in other authorities, to determine whether there may be an adverse effect to designated sites.

Please see our comments for Strategic Objectives (SO6) above regarding renewable energy.

Please see our comments for Strategic Objectives (SO6) above regarding Appropriate Assessment.

Please see our comments for Strategic Objectives (SO7) above regarding alternative transport.

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**Representer Number** 60

**Representation Number** 5711

**Policy/Chapter/Paragraph** Settlement Hierarchy

Internal Ref#

7

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

The South Denes is not listed as an employment area, it should be.

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**Representer Number** 62

**Representation Number** 5739

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

***Summary of Representation***

The Government's Objectives set out in PPS7: Sustainable Development in Rural Areas, include raising the quality of life and the environment in rural areas through the promotion of thriving, inclusive and sustainable rural communities, ensuring people have decent places to live by improving the quality and sustainability of local environments and neighbourhoods. If the distribution of housing overlooks settlements such as Ormesby St Margaret, the objectives set out in PPS7 along with the Council's own Strategic Objectives are at risk of not being achieved. In particular, the Core Strategy Strategic Objectives SO2 which aims to improve accessibility to essential services and SO13 which aims to sustain and enhance the borough's town and village centres as successful, attractive and vibrant destinations for shopping, culture, entertainment and leisure as well as places to live, would be difficult to achieve.

**Representor Number** 62 **Representation Number** 5737

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

Ormesby St Margaret is an example of a Larger Village which functions beyond its current classification and provides a service base for a broader area than merely its settlement limit. It has a range of local services and facilities; there is a convenience store on North Road in the village and also a butcher and baker. Additional facilities located in the village include a newsagent, a garage as well as outdoor sports facilities to the north of Station Road. Ormesby middle and first schools are both located in the village and there is also a good provision of secondary schools in the surrounding area; there are local secondary schools in nearby Caister (2.5 miles south east of Ormesby), Martham (5 miles north west of Ormesby) and Great Yarmouth (4.5 miles south), all of which are accessible by the number 1 bus service. In terms of local healthcare provision, there is a doctors and dentists practice on Pippin Close in the village, and a Chemist on Cromer Road which is less than a mile from the site. The number 1 bus service provides a link to the James Paget Hospital in Great Yarmouth, meaning that there is a full range of healthcare facilities that are accessible from the village. The village has a good level of sustainable transport links, for instance the number 1 bus service between Martham and Great Yarmouth, running at an hourly frequency, allows journey to Great Yarmouth town centre taking approximately 20 minutes. It also provides access to Great Yarmouth Railway Station, from which there is a regular service to Norwich, approximately a 30 minute journey away, with an increased frequency of service at peak travel times.

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**Representor Number** 62 **Representation Number** 5736

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

A more specific approach to development in smaller villages is encouraged by the East of England Plan. Paragraph 3.19 of the plan states that the growth of villages has been unable to halt the closure of village services and commuting has increased dramatically. The plan prescribes that careful examination of how a settlement or groups of settlements function is required, as well as analysis of the service base to determine the best solutions for each area.

**Representor Number** 62 **Representation Number** 5734

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

***Summary of Representation***

While we agree with the rationale behind the aim to provide the majority of the borough's housing to 2025 in the main settlements, it is considered that as the current spatial strategy stands, the preferred distribution as outlined in Policy CS1 of the Amended Core Strategy, is skewed too heavily towards the Main Towns and the Key Service Centres.

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**Representor Number** 62 **Representation Number** 5735

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

***Summary of Representation***

Of the villages designated as larger villages in the settlement hierarchy, there are examples that have similar functions to Key Service Centres, although they may be deficient in one of the selection criteria, not possessing their own secondary school for example. A broader spread of housing allocations across the borough directed by a more specific approach to the likely distribution of housing provision to reflect the local context more would achieve a more polycentric spread of development, providing a more robust and flexible spatial strategy.

**Representer Number** 62

**Representation Number** 5738

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

The vision for the Borough on page 9 of the document states that the Larger Villages should reflect their character and meet the needs of the community while also supporting the smaller villages. Rollesby, approximately 2.5 miles from Ormesby St Margaret, and Ormesby St Michael less than 2 miles away are both located on the A1064, and both scored 0 out of 5 on the criteria in the hierarchy of settlements background paper. PPS3, the Government's Planning Guidance on Housing states that, particularly in small rural settlements, the relationship between settlements should be considered to ensure that growth is distributed in a way that supports social support networks, assists people who live near their work and where possible encourage environmental benefits. The populations of the two smaller villages are supported by the services located in Ormesby St Margaret and if the viability of the services are not supported sufficiently by the allocation of new development, in addition to the effect on Ormesby St Margaret, there will be a negative impact of the smaller villages.

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**Representer Number** 62

**Representation Number** 5740

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

With such a large proportion of the development in the borough to 2025 being directed towards the main towns, there are additional factors that may have a significant effect of the deliverability of housing in these locations. The Sustainability Appraisal that has been undertaken for the Amendment to the Core Strategy raises concerns over the uncertainty of development in Main Towns due to the risk of flooding in Great Yarmouth and Gorleston and the resulting impact on the Core Strategy's vulnerability to climate change and sea level rise. The document also raises concerns about the potential development of high grade agricultural land at the periphery of the Key service Centres.

**Representor Number** 62 **Representation Number** 5741

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

It is considered that Ormesby St Margaret due to its size, having the largest population of the rural settlements, the services and facilities that it possesses, and the village's links to surrounding settlements, that it is capable of accommodating sustainable growth to enhance and protect the key facilities and services and to meet the needs of the community including affordable housing, rather than purely meeting the needs of the current community as set out under the Settlement Hierarchy heading on page 16 of the Amended Core Strategy Document. Due to close links with Scratby, Caister, Martham and Great Yarmouth, the village is considered to have capacity for development greater than that which the Core Strategy currently would direct. Increasing this would have the effect of supporting the existing services and facilities in the village and also those in the broader area

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**Representor Number** 62 **Representation Number** 5742

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

The Core Strategy should also provide a more detailed break down of indicative housing allocations at each settlement including the Key Service Villages and larger villages, informed by a more contextual approach to development in these settlements, this would provide more flexibility in the balance of housing across the borough

**Representor Number** 57 **Representation Number** 5680

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

Whilst it is appropriate for the Core Strategy to identify a settlement hierarchy and indicate which settlements will be the focus for development, it is considered inappropriate for the Core Strategy to predetermine at this stage the actual proportion of development which can or should be directed to certain towns/settlements. This is especially the case bearing in mind that the strategic housing assessment has yet to be undertaken.

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**Representor Number** 57 **Representation Number** 5681

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

By identifying the amount of development to be directed to each settlement the policy does not give sufficient flexibility in the production of other DPDs, such as the Site Specific Allocations and Proposals Map DPD, to allocate sites in the most sustainable and appropriate manner. This is particularly the case given that directing the proposed amount of development towards the main towns is likely to result in the need for Greenfield urban expansion land, the need to locate development within areas at risk of flooding and a reliance on certain areas where there are apparent deliverability issues. This is despite there being previously developed sites in larger villages such as Hemsby which do not suffer from flood risk or environmental issues etc, but which could, by virtue of these specified development thresholds, be excluded from consideration as potential housing or employment allocations. Accordingly the current wording of the Policy will not necessarily enable the development needs of the Borough to be met in the most sustainable and appropriate way when such matters are considered in other LDF documents. This is expanded upon in the response to draft Policies CS5 and CS8.

**Representor Number** 57

**Representation Number** 5682

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northern Trust

***Summary of Representation***

It is requested that Hemsby be re-classified as a 2nd tier key service centre.

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**Representor Number** 57

**Representation Number** 5798

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northern Trust

***Summary of Representation***

The policy should be re-worded with regards to the distribution of development within the settlements. In this regard the policy should simply identify the settlement hierarchy and provide a general indication as to which settlements will be the focus for development without specifying development thresholds. Indeed this was the approach of the former draft Policy CS2 'Settlement Hierarchy'. If development thresholds are to be included then a greater amount of development ought to be distributed to the key service centres and larger villages for reasons stated in relation to policies CS5 and CS8

**Representer Number** 52

**Representation Number** 5613

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We would currently find this policy unsound as it has not been demonstrated that the flood risk constraints of the area have been fully considered. The spatial strategy is proposing a significant proportion of development in areas of Great Yarmouth and Gorleston at risk of flooding. For the policy to become sound, you must justify the need for development to be located in this area and set out why it can not be located elsewhere based on the application of the PPS25 Sequential Test. Paragraph 16 of PPS 25 states.

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**Representer Number** 52

**Representation Number** 5614

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

It must be demonstrated that the Exception Test has been passed. This is set out in paragraph D9 of PPS25 and requires the flooding to be considered: a) that the development provides wider sustainability benefits to the community that outweigh flood risk; that the development is on developable, previously developed land; and that the development will be safe, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

**Representer Number** 52 **Representation Number** 5616

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In order for the policy to be sound, you will need to be confident that the amount of development you are proposing is deliverable in these areas considering the flood risk constraints. Of particular concern in the areas proposed for development is the ability to achieve safe access and egress. Once the SFRA has been finalised, we recommend arranging a meeting to discuss this issue further as more information becomes available.

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**Representer Number** 44 **Representation Number** 5557

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund suggests that this may require the Site Allocations process to allocate greenfield sites for employment and other uses in Hemsby, given the finite supply of previous developed land in the village.

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**Representer Number** 52 **Representation Number** 5617

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

You may be aware that the Environment Agency is currently reviewing the flood defence strategy for compartment C. In order for the Core Strategy to be sound it must be flexible enough to respond to any unexpected changes. This is an issue that we will also need to discuss further.

**Representor Number** 52 **Representation Number** 5615

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Both the Sequential and Exception Test should be informed by your Strategic Flood Risk Assessment (SFRA) once it has been finalised. We can provide advice on this if you would find it useful.

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**Representor Number** 44 **Representation Number** 5558

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

Notwithstanding, the objection to Hemsby's location in the Settlement Hierarchy, the Crane Executive Pension Fund accepts the Spatial Strategy's intention to accommodate 10-15% of the housing requirement up to 2025, and 5-10% of the employment requirement in settlements, including Hemsby. However, these targets should be expressed as minima to be achieved rather than ceilings to development. Also, the Core Strategy should acknowledge that achieving these targets may require the allocation of greenfield sites in villages.

**Representor Number** 1 **Representation Number** 5284

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

The preferred option is supported with the key focus for development on previously developed land within the town centre and surrounding urban waterfront areas. Therefore the urban areas of Great Yarmouth and Gorleston are correctly at the top of the settlement hierarchy, consistent with the aims and objectives of 1st East

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**Representor Number** 14 **Representation Number** 5376

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

A thorough AA is needed to determine whether the proposed housing allocations could have an adverse effect on Natura 2000 sites. The potential impacts from the developments proposed for Great Yarmouth and sites fully within The Broads are our key concerns.

If screening of the proposed developments and employment growth determines that the Plan may have an adverse effect on Natura 2000 sites, we recommend that the Council discuss this with Natural England and the RSPB as soon as possible.

**Representor Number** 14

**Representation Number** 5377

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

There should be a presumption against building in flood risk areas. We would expect policies to indicate that development will not affect future flood alleviation, attenuation or management opportunities. Flood risk is an important issue for the area and it is not clear how this is to be addressed. We suggest that a flood risk management plan is created to provide information to direct developments and ensure suitable measures to deal with flood risk are adopted.

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**Representor Number** 16

**Representation Number** 5432

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

The Core Strategy helpfully identifies Caister and Bradwell as second tier towns within which development will need to reflect the settlement's size and function as a Key Service Centre. This is supported by our clients.

**Representor Number** 16 **Representation Number** 5433

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### ***Summary of Representation***

CW and J Cargill support the more balanced distribution of residential development between the different tiers of settlements and the housing numbers that are specified (unlike the Core Strategy Preferred Options in 2006). Policy CS1 states that the 15-25% of the total housing requirement up to 2025 will be accommodated within Bradwell and Caister on Sea. Of the 7,240 dwellings to be provided within the Borough to 2025, this equates to 1086 - 1810 dwellings within the KSCs to 2025. CW and J Cargill would support the provision of residential development in Caister and Bradwell at the top end of this range for the reasons previously put forward, i.e. Caister is a sustainable location for further residential development in a town with good range of facilities which has sites unaffected by fluvial or maritime flooding.

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**Representor Number** 16 **Representation Number** 5434

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### ***Summary of Representation***

CW and J Cargill support the principle of reducing the percentage of residential development at Great Yarmouth and Gorleston (from 80% in the Housing DPD in June 2007 to 60-70% in the current Core Strategy Amendment). However, the proposed 60-70% of residential development (i.e. between 4344 and 5068) may still be considered too high for Great Yarmouth and Gorleston, for the reasons previously put forward to the Housing Topic Paper, Great Yarmouth URC Area Action Plan and the Core Strategy Preferred Options (2006). The reasons are centred around the over reliance of residential development in the URC Area and the problems regarding deliverability and flooding. The URC area is primarily suited to flatted development and this is confirmed in the 1st East Annual Review 2007/08. The Annual Review states that in the Breydon Reach North Quay, 500 homes will be provided on 5ha (therefore at 100 dwellings per hectare this will inevitably involve the building of flats) and 1400 homes will be provided on 15ha site at Ice House quay (approximately 93 dwellings per hectare and therefore again likely to be flats). This over reliance on flats is worrying as one of the results of the current recession has been to demonstrate that there has been a major over supply of these units of accommodation compared to family housing. Moreover statements from Government Ministers have encouraged builders to increase production of houses for families as opposed to flats. In such cases it is important to secure an adequate range of sites capable of delivering family housing which appears unlikely from the 1st East Annual Review.

**Representor Number** 16 **Representation Number** 5435

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill would like to reiterate their support for Bradwell and Caister-on-Sea being the Key Service Centre (KSC) on page 19 of the Core Strategy Amendment. Martham, Hemsby and Hopton-on-Sea are differing character and smaller sizes to Bradwell and Caister-on-Sea and therefore should not be classified as KSCs.

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**Representor Number** 42 **Representation Number** 5536

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

We support Policy CS1 in its aims of focussing development on sustainable locations, particularly Great Yarmouth and the town centre and waterfront redevelopment areas of Cobholm etc. Such focus we believe is entirely consistent with the strategic objectives of the Plan and will help to tackle high levels of unemployment and deprivation in this area utilising the existing services and high levels of accessibility to fuel urban renaissance and regeneration.

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**Representor Number** 42 **Representation Number** 5537

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

The Marsh Farm Caravan site is located within Cobholm and its redevelopment can contribute positively to the objectives of the Core Strategy.

**Representor Number** 44 **Representation Number** 5553

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund objects to Policy CS 1 of the Amendment to the Core Strategy's (Spatial Strategy and Settlement Hierarchy). The basis of the objection is the Spatial Strategy's omission of Hemsby as a Key Service Centre.

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**Representor Number** 45 **Representation Number** 5569

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

This is the Borough Council's preferred approach to the Spatial Strategy (CS.1), after consideration of consultations on a number of alternative options. Norfolk County Council supports the spatial strategy, set out in Policy CS.1.

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**Representer Number** 44 **Representation Number** 5559

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund can confirm that they control land at Martham Road (Bridge Farm) Hemsby, and are actively promoting its release for development. The site has potential for an employment led mixed use development scheme, potentially to also include small scale retail and perhaps housing. The intention would be to provide year round employment opportunities for local people and contribute to the creation of a more mixed and balanced community. The other uses would be included to provide flexibility and ensure the scheme's viability. The site has previously been registered with the Council through the Strategic Housing Land Availability Assessment (SHLAA) process.

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**Representer Number** 44 **Representation Number** 5556

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Core Strategy's starting point is therefore to acknowledge the village's potential to function as a Key Service Centre, and then to provide a spatial planning framework to enable the village to fulfil this role.

**Representor Number** 58

**Representation Number** 5705

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Indigo Planning

**Surname**

**Representing** Sainsburys PLC

***Summary of Representation***

This policy sets out the proposed level of development regarding the settlements hierarchy. The proposed levels of development as set out under this Policy are too prescriptive and unrealistic at this stage. Our view is that a more flexible approach should be taken.

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**Representor Number** 52

**Representation Number** 5618

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Aside from flood risk, the capacity of the sewage network must also be considered to ensure there will be no adverse impact on designated sites as a result of development. This will be informed by your Water Cycle Study as it emerges but we would be particularly concerned with areas that may impact upon European sites within the Broads. We therefore recommend you include a restriction on development in these locations (part d of policy CS1) along the lines of 'Development will not be permitted in these villages until it has been demonstrated that there is adequate capacity in the sewage treatment works'.

**Representer Number** 44 **Representation Number** 5560

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund suggests that the Spatial Strategy and Settlement Hierarchy (Policy CS1) is changed to: Identify Hemsby as a Key Service Centre. The objective for Hemsby should be to ensure diversification of its employment base into year round employment, through the provision of new accessible and fit for purpose employment locations (this will also require a change to the Key Diagram); Express housing and employment targets as minima to be achieved; and acknowledge that to achieve these targets, greenfield allocations will be required.

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**Representer Number** 38 **Representation Number** 5513

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

2-5% of the housing requirement will be accommodated in smaller vialges. This tally's at 2% = 145, 3%= 217, 4%= 290 and 5%= 362. Is this correct?

**Representor Number** 38

**Representation Number** 5512

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Options a,b,c and e are acceptable, at a push.

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**Representor Number** 53

**Representation Number** 5667

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Somerton Parish Council

**Surname**

**Representing**

***Summary of Representation***

We support this reference to the smaller Villages, including West Somerton, that "only small scale future development proposals will be supported, which contribute towards rural diversification, create or maintain the viability of existing Community facilities and meet identified local needs, including affordable housing", etc., however, could we request that this Parish be referred to as Somerton, thereby including both East and West Somerton.

**Representor Number** 54

**Representation Number** 5669

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Reedling Consultants

**Surname**

**Representing** Halls Group

***Summary of Representation***

The policy broadly considers areas of Yarmouth and Gorleston for redevelopment, however, there is no mention of Gorleston Riverside. The Halls Yard site is shortly to be relocated to Gapton Hall which will mean greater employment opportunities. The Riverside site will be available for redevelopment. This would fundamentally leave a large area of Gorleston Riverside Vacant. This site will be brownfield and would be available for redevelopment before other areas considered.

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**Representor Number** 56

**Representation Number** 5675

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation**

**Surname** Rogers

**Representing**

***Summary of Representation***

A bigger emphasis should be given to development at Belton. This has the advantage of not being on a flood plain, has good infrastructure and is located close to the commercial areas of Great Yarmouth which can easily be accessed by cycle or public transport.

**Representor Number** 57

**Representation Number** 5676

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

Objection is raised to the classification of Hemsby as a 3rd tier larger village rather than a 2nd tier key service centre. The draft Core Strategy acknowledges that at least 4 of the 5 services (as stated in the RSS) are provided in Hemsby and as such the settlement could be considered as a key service centre. The non designation of the settlement as a key service centre on the ground that the majority of local employment is tourism based is inappropriate. The supporting text to RSS Policy SS4 does not specifically require a settlement to have local employment opportunities in order to base a key service centre. In this regard the RSS refers to the 5 services identified as services which might be included within settlements and in doing so does not suggest that all of these services must be available for a settlement to be a Key Service Centre. Furthermore RSS Policy SS9 also promotes the regeneration of coastal towns and communities, including supporting the restructuring of coastal economies and the provision of jobs to satisfy local needs. This may be difficult to achieve if Hemsby is not classified as a Key Service Centre.

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**Representor Number** 57

**Representation Number** 5677

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

The non-designation of Hemsby as a key service centre on the grounds that it has no secondary school is inappropriate. When identifying the services which might be included within key service centres paragraph 3.17 of the RSS refers to "a primary school within the settlement and a secondary school within the settlement or easily accessible by public transport". Hemsby has a primary school within the settlement and there are secondary schools which are easily accessible by public transport, with there being designated school bus services passing through Hemsby to secondary schools such as Flegg High School which is just 20 minutes from Hemsby.

**Representor Number** 57 **Representation Number** 5678

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Hemsby has appropriate development opportunities on previously developed land within the urban area which is not at risk of flooding and which would not have adverse impacts on important landscapes or biodiversity. This is a relevant consideration given that Martham is not being classified as a key service centre on the basis that it has limited development opportunities. Indeed there is a large vacant previously developed site within the built up area of Hemsby and if the Core Strategy is adopted in its current form then this would place significant policy constraints on the ability to redevelop / regenerate this site, contrary to national policy statements which seek to maximise the use of previously developed land, secure the speedy redevelopment of vacant land and secure environmental improvements including regenerating dilapidated land / buildings.

---

**Representor Number** 57 **Representation Number** 5679

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the suggested development thresholds for the identified towns/settlements. These are considered inappropriate. The proposed development thresholds for the Borough's settlements directs insufficient development towards other settlements such as Hemsby.

**Representor Number** 44 **Representation Number** 5555

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund accept that presently, the majority of the employment opportunities in Hemsby are tourism related and therefore seasonal, but do not consider this to be a reason for its exclusion as a Key Service Centre in the Settlement Hierarchy. The Crane Executive Pension Fund suggest that to limit Hemsby's role as predominately tourism based service village throughout the plan period, leaves it in a very precarious position given the nature of tourism in this part of the Borough. Rather, the Core Strategy should be seeking to redress this imbalance and providing a spatial strategy for Hemsby's employment base to diversify into year round employment.

---

**Representor Number** 67 **Representation Number** 5769

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon Homes (Anglia) Ltd suggests that the submission version Core Strategy should therefore confirm Bradwell as a suitable location for growth, and indicate the approximate level of development to be at least 800 homes. Persimmon Homes (Anglia) Ltd contend that this level of development is necessary to ensure that the site is developed as a sustainable urban extension, including the provision of the remaining section of the South Bradwell to Gorleston access road (between the A143 and the sections of road already built and planned at Beacon Park) and other community infrastructure can be funded.

**Representor Number** 67 **Representation Number** 5771

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### ***Summary of Representation***

Persimmon Homes (Anglia) suggest that by identifying the South Bradwell/Gorleston area as suitable location for a sustainable urban extension, the Core Strategy would:

Better reflect the Council's own evidence base, by acknowledging the potential deliverability problems of brownfield and urban sites, particularly those affected by flood risk;

Provide the flexibility to take account of changing circumstances by identifying an alternative development site that could be brought forward sooner if and when required;

Provide a strategy capable of delivering sufficient numbers of housing for 15 years following adoption and throughout the plan period;

Provide the opportunity to complete the South Bradwell access road;

Provide for a longer term strategy, capable of delivering higher housing numbers beyond the plan period; and

Provide the Council with the confidence to accept an uplift in housing that may be expected through the RSS review process to meet existing and future local housing needs.

---

**Representor Number** 67 **Representation Number** 5770

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### ***Summary of Representation***

This approach would also give the Core Strategy the flexibility and headroom to accommodate any further housing numbers that may come out of the forthcoming East of England Plan review in order to meet local housing needs, and to offset any under delivery of brownfield sites in the URC area.

---

**Representor Number** 67

**Representation Number** 5767

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

The Amendment to the Core Strategy (the 2nd Preferred Options) document now acknowledges that not all of the housing requirement for the period up to 2025 can be met on Brownfield sites within the Urban area. Persimmon Homes (Anglia) Ltd agrees with this conclusion.

---

**Representor Number** 44

**Representation Number** 5554

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund agrees with the Council's conclusion that Hemsby meets four of the five criteria for designation as a Key Service Centre (Amendment to the Core Strategy, page 20). The Crane Executive Pension Fund also notes that this means that the village could be considered as a Key Service Centre. However, the Crane Executive Pension Fund does not agree with the Council's conclusion that because of the village's seasonal employment base, the village should not be identified as such, and instead should be considered a 'Larger Village'. It is the Crane Executive Pension Fund's contention that Hemsby should be designated a Key Service Centre in the Core Strategy, and a more positive strategy put in place to help the village diversify its employment base.

**Representor Number** 67 **Representation Number** 5766

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### ***Summary of Representation***

Persimmon (Anglia) Ltd notes that the Core Strategy 1st Preferred Options document anticipated that the RSS requirement of 6,000 homes could be met through existing commitments and sites within the urban area. The Core Strategy 1st Preferred Options suggested that no further Greenfield allocated sites were needed for the period up to 2021.

However, this assumption was on the basis that almost 75% of the housing requirement up to 2021 could be met on sites within the URC area (Great Yarmouth and Gorleston central and waterside areas) and 45% up to 2026. The basis underpinning this approach was that the majority of the identified brownfield and urban sites can be delivered over the plan period. However, it has become apparent that this may not be the case given the constraints on some of these sites, such as flood risk, and access. Also, the requirement to provide for 15 years worth of housing from the date of adoption (up to 2026) has resulted in the need for further housing to be accommodate in the Borough.

---

**Representor Number** 67 **Representation Number** 5765

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### ***Summary of Representation***

It is Persimmon (Anglia) Ltd view that this approach accords with the National Housing Planning Policy (PPS3) which maintains an urban focus to new development, although recognising the need for Greenfield development to meet housing targets. The approach also appear to be in general conformity with the East of England Plan (RSS) which expects at least a further 6,000 new homes in Great Yarmouth District over the period 2001- 2021.

**Representer Number** 67 **Representation Number** 5768

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon Homes (Anglia) Ltd also fully supports the Council's acknowledgement of the need to plan for development up to 2025 and beyond, and that Greenfield sites in locations not affected by flood risk are required to meet housing needs.

---

**Representer Number** 67 **Representation Number** 5764

**Policy/Chapter/Paragraph** CS1 Spatial Strategy

Internal Ref#

8

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon (Anglia) Ltd supports the Amendment to the Core Strategy's revised Spatial Strategy (CS1) relating to accommodating strategic growth at Bradwell. The Amendment to the Core Strategy (GYBC, February 2009) (Policy CS1: Spatial Strategy) identifies Great Yarmouth and Gorleston as the primary location for growth, with a need to focus on the regeneration of the core urban area of the town, particularly the waterside areas. After Great Yarmouth and Gorleston, the settlement hierarchy identifies Bradwell (and Caister-on Sea) as the next most appropriate places for development. Bradwell and Casiter on-sea are described as service centres suitable location for accommodating homes to meet housing needs up to 2025. The policy recognises that there is a need to identify Greenfield land to meet housing needs.

**Representer Number** 52 **Representation Number** 5622

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

*Summary of Representation*

(k)..Include "to seek improvement to water quality and reduce pollution to the wider environment" including water soil, air, light and noise.

---

**Representer Number** 52 **Representation Number** 5623

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

*Summary of Representation*

(l) minimise water and carbon dioxide emissions through the use of renewable energy measures wherever possible...and include "and maximise water efficiency to ensure the sustainable use of water resources"

---

**Representer Number** 14 **Representation Number** 5379

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

*Summary of Representation*

We are pleased that open spaces and biodiversity will be conserved and enhanced, but would like to see reference made to the creation of new habitats, as this would also increase the area's ability to adapt to climate change.

**Representor Number** 41

**Representation Number** 5533

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Broads Internal Drainage Board

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

One of the most significant considerations in trying to minimise the risk of flooding is ensuring that all development have an efficient drainage system. This may or may not be through the use of sustainable drainage systems, and will be situations where although SUDS would be practical, they would not be the optimal solution from a drainage or flood risk perspective. I would therefore request that you consider changing the wording of this point to something like "minimise the risk of flooding by ensuring that developments have an efficient, suitable drainage system, incorporating SUDS where appropriate".

---

**Representor Number** 52

**Representation Number** 5621

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

(j) ..include "manage and reduce the impact of tidal, coastal and fluvial flood risk and minimise the risk of flooding "from surface water" by implementing sustainable drainage systems.

**Representer Number** 16 **Representation Number** 5436

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill support this policy and its objectives.

---

**Representer Number** 52 **Representation Number** 5620

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

(g) conserve and enhance valued open spaces, the character and quality of local landscapes, The Broads landscapes and wider countryside.....and include "and improve habitat connectivity by creating linkages between green spaces"

---

**Representer Number** 52 **Representation Number** 5619

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We support the inclusion of a policy to promote the sustainability of new development. As recognised by the SA, this policy is key to mitigating the impacts of development during the plan period and has significant positive effects on the environment.

**Representor Number** 14 **Representation Number** 5378

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports sustainable development. We are pleased that measures to limit car travel will be promoted, along with other measures that will help reduce the Council's contribution to climate change.

---

**Representor Number** 14 **Representation Number** 5380

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

By linking such measures with other strategic Plans, such as the Shoreline Management Plan, they could enhance the protection of vulnerable communities.

---

**Representer Number** 46 **Representation Number** 5582

**Policy/Chapter/Paragraph** CS2 Sustainable Development

Internal Ref#

9

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

CPRE very concerned how genuine sustainable development is. RSS is centralist planning: little opportunity for communities most affected to have their say.  
A lack of proper Environmental Assessments means developments do not properly take into account local amenity, built and natural environments  
Car dominated transport policies which do not genuinely seek and encourage non-car forms of transport. Greater use of public transport, cycling and walking is needed.  
Too low a proportion of new development on Brownfield sites compared to Greenfield.  
Actively seek to reuse empty buildings rather than allocate more Greenfield sites

---

**Representer Number** 45 **Representation Number** 5574

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

It would be helpful if Policy CS.3 referred to the potential for the Borough Council to prepare a Community Infrastructure Levy and/or tariff-based approach to planning obligations in line with emerging Government guidance.

**Representor Number** 46 **Representation Number** 5583

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Developments must not proceed without proper infrastructure being already in place or provided at the same time as buildings are constructed. Thorough infrastructure requirement conditions must be part of planning approvals and these conditions must be rigorously enforced.

---

**Representor Number** 45 **Representation Number** 5573

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

Reason for the Preferred Approach (page 24) – There is concern with the final sentence of this paragraph, which refers to development not taking place before the infrastructure needed is in place. It should be noted that payments towards infrastructure and service provision is generally phased (particularly on larger sites) once development has commenced. It would seem a little unreasonable to seek/demand all contributions before the any development has taken place/commenced and may be too onerous on the development industry particularly in the current economic climate. It would be more sensible to say that: Development will not take place until a S106 agreement is in place, which provides the mechanism to mitigate the impact of the proposed new development by providing funding to pay for necessary infrastructure and services. Payments should be made in a timely and fair manner to minimise the impact on existing services and infrastructure.

**Representor Number** 45 **Representation Number** 5572

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

Policy CS3 – The Policy should refer specifically to schools and education provision under item (e) on Community Facilities as this is likely to be a significant component of any planning obligations requirement associated with new development. (It is noted that further clarification on Community Facilities is set out in Policy CS.14).

---

**Representor Number** 60 **Representation Number** 5712

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

CS3 should include schools in its list of necessary contributions.

---

**Representor Number** 8 **Representation Number** 5341

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Norfolk Wildlife Trust

**Surname**

**Representing**

### *Summary of Representation*

It would be useful to include reference to green infrastructure in this policy, which would draw together provision of open space and biodiversity and relate to the Borough ecological network map. In our view, in addition to financial payment that is specific to the impacts of a particular development, there should be a set rate per household to (particularly in and around Yarmouth) in order to ensure that green infrastructure is provided that mitigates for the increase in housing within the town. Consideration should be given to producing a green infrastructure strategy and GI implementation plan for the town. This could help provide facilities such as a new country park along the shore of Breydon Water and/or in Bure Loop along with green links out to the coast and Broads. This approach has been taken in the Thetford Area Action Plan, which is currently out for consultation and is included in Mid-Bedfordshire Planning Obligations SPD which was adopted in 2008. The latter document sets a figure per household for green infrastructure provision which is separate from direct site related biodiversity impacts which are considered on a site by site basis.

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**Representor Number** 12 **Representation Number** 5352

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Highways Agency

**Surname**

**Representing**

### *Summary of Representation*

Whilst the Core Strategy refers to the need to provide infrastructure for non car modes, there is no reference to include measures to encourage the usage of such facilities through the implementation of Smarter Choices and travel plans. It is suggested that the location of development is based on location where there is the greatest opportunity to reduce travel demand, both existing and future.

**Representor Number** 45

**Representation Number** 5571

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

The Core Strategy's overall approach is broadly consistent with The East of England Plan and Government guidance set out in Circular 5/05 (Planning Obligations) and is therefore largely welcomed. However there are a number of specific comments; which the County Council wishes to make on infrastructure provision:

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**Representor Number** 52

**Representation Number** 5625

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In order to make this policy sound, point (h) should be amended to 'Surface water management and flood risk management'. As currently written it is too restrictive and does not include the wider policy aims of PPS 25. The revised wording will allow a wider reduction in flood risk in the area to be sought as part of development proposals, rather than just flood protection.

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**Representer Number** 52

**Representation Number** 5624

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are very pleased that you have included point (f) provision of open space and recreational facilities, and point (j) environmental improvements including habitat management and creation, biodiversity protection and enhancement, within the list of possible contributions. It is important that green infrastructure is encouraged and planned at an early strategic level within development areas to achieve the most positive outcomes. These spaces can also be used to Make Space for Water, provide opportunities for innovative flood defences and create SuDS whilst also improving the social and economic vitality of the area.

---

**Representer Number** 64

**Representation Number** 5746

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

The preferred option is option3 with a contribution from all developers but due to government guidance limitations option 2 is the preferred option with developer contribution from residential developments only, is my understanding of that correct? Given the economic reality of today we would support the use of option 3.

**Representer Number** 14 **Representation Number** 5382

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the range infrastructure identified. Many of these measures will need to be implemented and functioning prior to large-scale development taking place. Leaving the addition of necessary infrastructure until after development may mean that it is not as effective or sustainable.

---

**Representer Number** 14 **Representation Number** 5381

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the policy statement that “environmental improvements including habitat management and creation, biodiversity protection and enhancement.”

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**Representer Number** 52 **Representation Number** 5626

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

The policy should also include provision of water services and upgrades to the sewer network. Your Water Cycle Study will inform these requirements as it progresses to ensure the sustainable and integrated delivery of water and wastewater services for new development. Indicators for this should also be reflected in the monitoring framework.

**Representer Number** 68

**Representation Number** 5793

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** English Heritage

**Surname**

**Representing**

*Summary of Representation*

We suggest part j) is amended to read '...creation, and protection and enhancement of biodiversity, and the built and archaeological heritage'

---

**Representer Number** 14

**Representation Number** 5383

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

*Summary of Representation*

The RSPB strongly encourage the Council to adopt a policy that receives developer contributions from housing and, where appropriate, other types of development. By only obtaining contributions for housing this would greatly limit the benefits that could be obtained for open spaces and biodiversity protection and enhancement; such measures being important for sustainable and adaptable communities. Breckland District Council in their Area Action Plan has already adopted this option. They will seek contributions from all development via a pre-determined tariff system, with developers having to demonstrate why they would be exempt from contributing.

**Representer Number** 7

**Representation Number** 5337

**Policy/Chapter/Paragraph** CS3 Infrastructure

Internal Ref#

10

**Sub Section**

**Company/Organisation** Theatres Trust

**Surname**

**Representing**

***Summary of Representation***

This policy contains all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Borough. Good quality community and cultural facilities are essential components in the development of sustainable communities. It is important to provide, protect and promote cultural and leisure facilities for their leading role in the quality of life for residents and for their valuable contribution to the character and function of Great Yarmouth for visitors.

---

**Representer Number** 42

**Representation Number** 5539

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

Our objection stems from the apparent exclusive application of regeneration and renaissance Policy CS4 to the URC Area Action Plan area. This in our view is a perverse approach whereby a brownfield site within an urban area identified as a priority for regeneration in the RSS which is greatly in need of regeneration is excluded by such a policy.

**Representor Number** 42 **Representation Number** 5538

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

We have no objection to the focus of development on Great Yarmouth as a priority area for regeneration seeking to address weak economic performance and high levels of deprivation. Neither do we object to the identification of town centre and waterfront locations such as Cobholm for such regeneration and renaissance. Indeed, the Marsh Farm Caravan site consists of brownfield land of redevelopment potential located in an area of economic and social need in proximity to the town centre and sustainable transport links. Consequently, the site has all the attributes that the Council wishes to build on in securing regeneration and renaissance.

---

**Representor Number** 42 **Representation Number** 5542

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

Policy CS4 should be amended accordingly. If for example appropriate flood defences were to be constructed then there would be no reason to preclude regeneration in the way currently produced by the draft policy.

**Representer Number** 64

**Representation Number** 5747

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

Previously Pastuer Road has been defined as one of the gateways to Great Yarmouth and clearly our land sits adjacent to Pasteur Road, I believe our land is currently classified as employment land and we would not wish it to have some other classification just because of its position. An attractive building can be more of a gateway than open space which has been suggested elsewhere. Therefore we would oppose the possible open space designation for our land and propose a commercial led mixed use designation instead given the position.

---

**Representer Number** 42

**Representation Number** 5541

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

In our view, redevelopment, regeneration should be encouraged, subject to satisfactory flood risk mitigation, outside the URC defined area.

**Representor Number** 42 **Representation Number** 5540

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

We feel that this policy (like Policy CS11) will have unintended adverse consequences. Within the urban area of Great Yarmouth outside the URC area, there will, in effect, be a presumption against redevelopment and regeneration even if flood risk can be satisfactorily mitigated.

---

**Representor Number** 45 **Representation Number** 5575

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

Support the principle of regeneration and economic objectives contained in Policy CS.4. However note should be made in policy CS.4. that the Regional Economic Strategy also identifies the Great Yarmouth and Lowestoft sub-region as the principal regeneration priority area for the region.

---

**Representor Number** 46 **Representation Number** 5584

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

CPRE CONDITIONALLY supports this policy. The Borough Council must Plan, Monitor and Manage development. The welcome renewal of run down parts of the Borough should not lead to poor quality and bad development as has occurred in many urban areas in the past.

**Representer Number** 60 **Representation Number** 5713

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

CS4 should refer to the target of 5,000 jobs in the East of England Plan.

---

**Representer Number** 14 **Representation Number** 5386

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

There should be a presumption against building in flood risk areas. We would expect policies to indicate that development will not affect future flood alleviation, attenuation or management opportunities. Flood risk is an important issue for the area and it is not clear how this is to be addressed. We suggest that a flood risk management plan is created to provide information to direct developments and ensure suitable measures to deal with flood risk are adopted.

---

**Representer Number** 64 **Representation Number** 5748

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

Of the main five regeneration areas Runham Broad is still described as a mixed use predominantly tourism area while I know the Company residents of the Eurocentre incurred costs and time in reviewing this with the Urban Regeneration Company to retain a plan for the retention of the existing business park and options for its extension, this appears to be missed in the description.

**Representor Number** 14 **Representation Number** 5384

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

### *Summary of Representation*

The RSPB supports the Councils approach to be focused on 'brownfield' sites. A caveat to this though, is the importance that brownfield sites may have in supporting biodiversity within urban areas. This point is reflected in paragraph 13 of PPS9- Biodiversity and Geological Conservation, which states "where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities, together with developers, should aim to retain this interest or incorporate it into any development of the site." For example, Canvey Wick in Thames Gateway was the first brownfield designated as a Site of Special Scientific Interest (SSSI) for its invertebrates. The key issue for the RSPB is that biodiversity should be protected and enhanced wherever it is found, in order to deliver national and international commitments.

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**Representor Number** 68 **Representation Number** 5794

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** English HeritageEnglish Heritage

**Surname**

**Representing**

### *Summary of Representation*

In part e) we suggest re-wording to read 'to contribute to buildings or structures with local or national heritage interest and to the surrounding environment through sympathetic enhancement or conservation'

**Representor Number** 54 **Representation Number** 5670

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Reedling Consultants

**Surname**

**Representing** Halls Group

***Summary of Representation***

The land identified by the Urban Regeneration Company has considered sites for development, however, the Riverside road site would be available within the scope of the Core Strategy and before other areas that have been identified.

---

**Representor Number** 65 **Representation Number** 5755

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

This policy states that regeneration will be concentrated on the previously developed land and waterfront areas within Great Yarmouth and Gorleston supported by the Urban Regeneration Company (URC) Area Action Plan. The 1st East URC regeneration area does not include Gapton Hall Retail Park. It does, however, include land to the east of Gapton Hall Road opposite the retail park. This area includes a number of important retail and commercial uses.

**Representer Number** 65 **Representation Number** 5756

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

Whilst CBRE Investors supports the general aims and objectives of the URC APP, the exclusion of Gapton Hall Retail Park appears to undermine the objective of promoting economic regeneration on brownfield sites. Gapton Hall Retail Park is a popular existing retail destination that attracts a significant amount of expenditure into the Borough. The regeneration and intensification of this existing brownfield retail destination would only help to achieve objective (a) and (b) of Policy CS4.

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**Representer Number** 65 **Representation Number** 5757

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

CBRE Investors disagrees with the exclusion of Gapton Hall Retail Park from the URC area and believes that all the out-of-centre retail destinations focussed on the Gapton Hall Road roundabout need to be considered as one comprehensive retail and commercial destination.

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**Representer Number** 51 **Representation Number** 5604

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Peacock & Smith

**Surname**

**Representing** WM Morrisons

***Summary of Representation***

Morrisons generally support the regeneration proposals for Gorleston under draft Policy CS4 however we note that the more detailed proposals will be progressed within a forthcoming Area Action Plan, which we wish to be consulted on.

**Representer Number** 14 **Representation Number** 5385

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

It should be made explicitly clear that Green Infrastructure will be incorporated in any development.

It should be made explicit that, where possible, Green Infrastructure is to be incorporated in any development.

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**Representer Number** 16 **Representation Number** 5452

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

As part of the Core Strategy, the Council is obliged to be able to demonstrate that they can demonstrate a 5, 10 and 15 year supply of housing. However with respect to the URC sites, it is clear these cannot be included in the 5 year supply as they do not have consent and appear to be some years from achieving a consent. PPS 3 requires specific deliverable sites to deliver housing in the first five years (i.e. the site is available now with the reasonable prospect that housing will be delivered within five years). This is not the case with the URC sites.

**Representor Number** 16 **Representation Number** 5456

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

As such, policy CS4 is not consistent with PPS 3 which in turn makes it contrary to the Guidance set out in PPS 12 (June 2008). It is also not in accordance with PPS 3 as the policy is not flexible to deal with changing circumstances (i.e. the area has many constraints and may not all come forward for development). Again, this is contrary to PPS 12 which requires a Core Strategy to be justified, effective and consistent with national policy.

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**Representor Number** 16 **Representation Number** 5454

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

The URC sites are complex and in this point in time are neither available nor achievable. The area is subject to flooding; has existing commercial uses in full operation; is in multiple ownership and there are no safe escape routes. In fact the Urban Potential Study undertaken by Baker Associates in 2004, recommended that GYBC remove the North Quay allocation from the Plan. This was recommended as no evidence existed to suggest that housing was suitable nor was likely to occur on the site in the plan period. No further assessment appears to have been progressed, making the Core Strategy unsound since it cannot be justified by an evidential base.

**Representor Number** 16 **Representation Number** 5437

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill object to policy CS4 criterion a) which related to the URC Area Action Plan Area and states that approximately 2000 dwellings will be provided.

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**Representor Number** 16 **Representation Number** 5438

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

This 2000 dwelling figure has increased from 1800-2100 in the Area Action Plan Area Plan Preferred Options Document. At the time of the AAP consultation, concerns were raised over this wide ranging figure and it was hoped that the range could be narrowed as a result of a proper feasibility exercise. Whilst the latest estimate (2000) removes the uncertainty of a range it does nothing to demonstrate they can actually be achieved as there appears to be no feasibility exercise.

**Representor Number** 16 **Representation Number** 5439

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

There does not appear to be any justification for derivation of the 2000 dwelling figure for the Great Yarmouth URC area. Approximately 2,000 units are referred to in the 1st East Annual report (500 units at Breydon Reach, North Quay, 105 units at Blue Harbour Quay and 1,400 units at Ice House Quay) although again there is no explanation of how this total has been calculated. Further to conversations with the 1st East Regeneration Company, it is understood that work is being undertaken in the URC area with regards to flooding, contamination and Masterplanning and this will eventually establish the constraints on the various sites. It is therefore concerning that specific dwelling numbers are being put forward in the Core Strategy when this initial work has not yet been undertaken.

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**Representor Number** 16 **Representation Number** 5450

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

It is concerning that no further studies have been undertaken by the Council as to whether 2,000 units can be achieved in this URC area and that the 1st East Area Action Plan (AAP) has not been developed further since February 2007. The next consultation on the AAP is expected in the summer of this year, so it appears to be premature to assume 2,000 units in the Core Strategy can be delivered when there are no supporting studies to justify this number of dwellings. For these reasons the Core Strategy is unsound.

**Representor Number** 57 **Representation Number** 5799

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northern Trust

***Summary of Representation***

Support should be given to the regeneration and re-use of derelict/vacant land throughout the Borough.

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**Representor Number** 16 **Representation Number** 5457

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Changes that should sought are as follows: The Core Strategy should be based on sound evidence which confirms the number of units that are deliverable in the URC area, furthermore, the Core Strategy should be revised to reduce the proposed 2000 dwellings in the URC area as the figure cannot be relied upon to meet part of the 7240 dwellings allocated in the Borough between 2001 and 2025.

**Representor Number** 16 **Representation Number** 5451

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

We take the view that the 2000 dwellings in the URC area cannot be relied upon with any degree of certainty to meet the 7240 dwellings required in the Borough between 2001 and 2025 given the concerns in relation to flooding, an over reliance on flats, land ownership and the absence of any assessment as to whether 2,000 units can be delivered in this area. Therefore the Core Strategy is unsound, it has no evidential base to support the dwelling numbers in the AAP.

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**Representor Number** 16 **Representation Number** 5455

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Table 8 of the Core Strategy Amendment sets out the Delivery Framework of the Core Strategy. In relation to policy CS4 (and CS5) it outlines the risks of the policy (i.e. to the delivery of housing development in the URC area) and states: "Flood risk issues may not be resolved, which will have an impact on the delivery of the brownfield sites" These statements alone demonstrate conclusively that there is too much uncertainty in bringing forward these sites and they should not be included in the 15 year supply.

**Representer Number** 16 **Representation Number** 5453

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

We also take the view that all 2000 units cannot even be included in the 15 year supply, as it would be contrary to PPS 3, which requires developable sites for years 6-10 and where possible, years 11-15. For sites to be considered as developable, there should be a reasonable prospect that the site is available for and could be developed at the point envisaged. It is unlikely that all the sites in the AAP will be developed by year 15 and therefore they cannot be relied upon. The step change in housing delivery requires certainty, deliverability and positive allocations to be made.

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**Representer Number** 52 **Representation Number** 5633

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Many of the objectives currently included in the policy can also provide environmental benefits. For example, objective (d) requires high standards of design quality by encouraging innovation in design. This can be achieved to also improve flood risk management, make space for water, create recreational space, enhance habitats and assist in the management of surface water whilst creating an attractive, unique and desirable environ.

**Representer Number** 52 **Representation Number** 5632

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

As mentioned for CS1, to be sound the policy needs to be flexible enough to account for any changes in circumstances. The Environment Agency is currently reviewing its flood defence strategy for compartment C which may affect future development in both Ice House Quay and Cobholm. We will need to discuss this issue further when more information is available. Once the above issues have been discussed, we will be able to offer further advice on the wording of policy CS4.

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**Representer Number** 52 **Representation Number** 5631

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Discussions with your emergency planner will be critical to establish if the emergency infrastructure can cope with the proposed growth.

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**Representer Number** 52 **Representation Number** 5630

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

The policy is also proposing approximately 20 000m<sup>2</sup> of retail and leisure uses which are considered by PPS 25 as 'less vulnerable' land uses. This type of development does not have to meet such onerous standards, but there clearly still would be a significant risk associated with development of this nature.

**Representer Number** 52

**Representation Number** 5629

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

PPS 25 considers residential dwellings as a 'more vulnerable' land use (table D.2) and applications for this type of development are required to demonstrate that safe access and egress is achievable in the design flood event. However, it is evident from your draft SFRA and site specific Flood Risk Assessments that in some parts of the URC area this is a significant challenge, most notably in Cobholm, Southtown and Runham. Clearly this issue is key to delivering your Core Strategy and we will need to discuss it further once your SFRA has been finalised.

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**Representer Number** 52

**Representation Number** 5628

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Notwithstanding the need to apply the PPS 25 Sequential and Exception Test, you must also be able to demonstrate that the proposed regeneration is deliverable with regards to the flood risk constraints. Of particular concern is the proposal for approximately 2000 dwellings in the Urban Regeneration Company (URC) area, with the key priority areas being Cobholm, North Quay and Ice House Quay (Southtown). Whilst we appreciate the need to regenerate these areas, they fall within a high flood risk area which is set to increase significantly with climate change.

**Representer Number** 52 **Representation Number** 5627

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

As with Policy CS1, we would currently find this policy unsound as it has not been demonstrated that the flood risk constraints of the area have been fully considered. This is supported by the SA which determines an uncertain effect for objective 14: Vulnerability to climate change and acknowledges that flood risk and/ or climate change needs to be mitigated.

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**Representer Number** 52 **Representation Number** 5800

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Currently we consider the objectives are biased towards achieving social and economic gains which is acknowledged by the SA. We would therefore like to see a stronger emphasis on achieving environmental enhancements such as: sustainable construction and design, including energy and water efficiency and reduction in waste production; exploitation of renewable energy where possible; creation, protection and enhancement of green spaces and networks to improve biodiversity in the area.

**Representer Number** 57 **Representation Number** 5685

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

It is therefore requested that the policy be amended so that it does not specify the amount of development which is to be directed to the URC Area.

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**Representer Number** 57 **Representation Number** 5683

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

For reasons stated in relation to Policies CS5 and CS8 objection is raised to the policy identifying the amount of dwellings, retail and associated leisure uses which are to be directed to the Urban Regeneration Company (URC) Area. Indeed the former draft Policy CS3 made no reference to the amount of development to be directed to this regeneration area and instead set the priorities for the preparation of the action area plan. Whilst the URC Area Action Plan Preferred Option has now been published this has not been considered at an inquiry and has not been adopted. Furthermore it is the function of the Core Strategy to set the criteria for identifying location and priorities for the preparation of area action plans, rather than area action plans dictating the content of policies within the Core Strategy which appears to be the case in this instance.

**Representor Number** 1 **Representation Number** 5285

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

The provisions of this policy are welcomed, emphasising the critical role that 1st East and the Area Action Plan (AAP) will play in the regeneration of the previously developed land and waterfront areas in Great Yarmouth and Gorleston.

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**Representor Number** 57 **Representation Number** 5684

**Policy/Chapter/Paragraph** CS4 Regeneration and Renaissance

Internal Ref#

11

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is also raised to the fact that the policy only refers to regeneration within Great Yarmouth. It is contended that national planning guidance supports the positive recycling of vacant and underused buildings and previously developed sites within the urban area generally, with PPS1 stating that the condition of our surroundings has a direct impact on the quality of life, requiring planning to seek to maintain and improve the local environment and help mitigate the effects of declining environmental quality (paragraph 18). As such it is considered that the policy ought to also promote regeneration and the speedy re-use of vacant and dilapidated areas throughout the Borough and not just at Great Yarmouth.

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**Representor Number** 42 **Representation Number** 5545

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

We note the statement under "Issues and Options Consultation - Stage 1" that "there is not enough previously developed land in Great Yarmouth etc". Clearly Policy CS4 is inconsistent with this statement and the Plan must allow such sites to come forward for housing (subject to appropriate flood risk mitigation) outside the URC defined area.

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**Representor Number** 42 **Representation Number** 5544

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

We object to the use of the sequential test in choosing housing sites. Again, the sequential test was removed from the current PPS advice and therefore it is not open to the Council to reintroduce a test already abandoned by Government Policy.

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**Representor Number** 42 **Representation Number** 5543

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

The inclusion of a windfall allowance in the last 5 years of the 15 year total housing supply period. Contrary to the statements made, PPS 3 does not allow the inclusion of a windfall allowance in the latter years of the plan. PPS 3 allows a windfall allowance only in exceptional circumstances in the early part of the Plan period and not at all in the later stages. Consequently, the housing position at 31 March 2008 should be recalculated accordingly.

**Representor Number** 67 **Representation Number** 5773

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

In broad terms, PPS3 Housing seeks: the creation of mixed and balanced communities; through the development of high quality housing to meet current and future needs, in the right locations using land (greenfield and brownfield land) in a flexible and responsive way. Its focus is on outcomes and delivery, seeking to ensure an ongoing supply of suitable, deliverable and available sites for development over a 15 year period, with a particular focus on the first 5 years. Recent Government announcements have also reemphasised the importance of housing delivery, with national and regional housing targets to be increased.

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**Representor Number** 16 **Representation Number** 5465

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### *Summary of Representation*

Aside from the fact that the estimated 800 dwelling shortfall is incorrect because it does not take into account problems over delivery in the AAP area), there is no mention of where the greenfield land at Bradwell is located to accommodate the additional dwellings. This is extremely unhelpful as the allocation at Bradwell cannot be compared against the two Caister sites that CW and J Cargill have promoted.

**Representor Number** 16 **Representation Number** 5466

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

In terms of approach, CW and J Cargill object to the two options put forward on page 35 of the Core Strategy Amendment for solutions to meet the shortfall in housing to 2025, as neither Nova Scotia Farm, Caister nor Pointer East, Caister have been considered to meet this shortfall. The only reference to Caister in the Core Strategy is in two paragraphs on page 34.

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**Representor Number** 16 **Representation Number** 5467

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

In terms of the constraints identified allegedly preventing further development at Caister, the two sites being promoted by CW and J Cargill are unaffected by these factors. Unfortunately the failure to produce the SHLAA before this document is released for consultation is regrettable.

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**Representor Number** 67 **Representation Number** 5783

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The site's development would also provide opportunity to bring about improvements to community and other facilities in Bradwell/South Gorleston, including open space, contributions to education, health and other community facilities if necessary. Importantly, the site would deliver the remaining section of the Bradwell to Gorleston Southern Access Road (between the A143 and the sections of road already built and planned at Beacon Park). This represents a significant transport infrastructure improvement in this part of the Borough and an important Council aspiration, improving access to and from existing and proposed employment areas, the hospital and Gorleston/South Great Yarmouth. It would also provide an opportunity to improve access arrangements at Oriel Avenue by the provision of a link to the South Bradwell to Gorleston access road between the school and football ground.

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**Representor Number** 22 **Representation Number** 5483

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

### *Summary of Representation*

Two locational options are presented for consideration, both of which include the allocation of a greenfield site in Bradwell. The allocation and development of this site is to be conditional on the provision of necessary infrastructure, including an A12/A143 link road. It is also stated that the Development Control Policies DPD will provide details of the phasing approach and mechanisms for the release of land. In commenting on this "option" attention is drawn to the consideration of this land as part of the James Paget Hospital (JPH) strategic view. At the time the Highways Agency voiced strong reservations with regard to the potential adverse impact of development in this location in terms of traffic generated. We therefore agree that any residential development in this location should only take place if necessary transport infrastructure is provided.

**Representor Number** 67 **Representation Number** 5782

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

In-line with the Spatial Strategy, Settlement hierarchy, housing policy and taking into account the impact of flood risk in other areas, including Great Yarmouth, Gorleston and Caister-on-Sea, the land at South Bradwell (between the A143 and Beacon Park), promoted by Persimmon Homes (Anglia) Ltd represents the best option for a medium scale sustainable urban extension to meet the town's housing needs up to 2025 and beyond.

The site itself is well related to the urban area, and can be successfully integrated within the existing urban grain to help soften the current hard urban edge in this part of the town. The site will be accessible by means other than the private motor car and would be within easy cycling and walking distance of current and new facilities, major employment areas (including the hospital) and other services.

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**Representor Number** 67 **Representation Number** 5781

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The area has a relatively limited planning policy history. The area was at one time identified in the draft Great Yarmouth Local Plan as housing allocations and a "Longer Term Housing Area (beyond 2006)", but these designations were not carried through into the final adopted document. The Inspector reasoning (inter alia) that the land was not required to meet housing numbers after taking account of brownfield sites; the fact that parts of the land was contrary to the now deleted PPG7 concerning Grade 2 agricultural land; and landscape impact issues. The Inspector did reason that part of the land could be allocated at the eastern edge of HOU4 if needed, but this was not carried through to the adopted Local Plan (Ref: Inspector's Report - Paras 6.16-6.18). Instead land elsewhere in the district was allocated.

**Representor Number** 67 **Representation Number** 5780

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

Persimmon Homes (Anglia) Ltd notes that the Amendments to the Core Strategy (2nd Preferred Options) focuses growth on brownfield and urban sites in Great Yarmouth and Gorleston. However, it acknowledges a shortfall of provision of 800 homes for the period up to 2025. The Core Strategy proposes 2 spatial options of how this shortfall could be met.

Both spatial options include Bradwell as a suitable location to accommodate some or all of the growth. The difference between the two is that Option 1, suggests that some of the 800 homes could be allocated to Bradwell and a site in Martham. Option 2 suggests that all of the 800 homes could be allocated in Bradwell.

The Amendments to the Core Strategy acknowledges that a larger scale allocation at Bradwell will result in better prospects for the provision of affordable housing, community facilities, decent infrastructure and the A12 to A143 link road. Persimmon Homes (Anglia) Ltd agrees with this conclusion. Persimmon Homes (Anglia) Ltd therefore supports Option 2 and objects to Option 1.

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**Representor Number** 22 **Representation Number** 5485

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

### *Summary of Representation*

A point of technical attention is drawn to the requirement for existing planning commitments, (including the permission for 350 additional parking spaces at JPH) to be taken fully into account as part of the assessment of highway capacity as and when detailed transport assessment are undertaken in conjunction with potential development at Bradwell.

**Representor Number** 67 **Representation Number** 5775

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

In terms of PPS7 – Sustainable Development in Rural Areas, there is no longer an explicit requirement to protect the best and most versatile agricultural land, as there was with PPG7. Rather, PPS7 requires the sustainability of using agricultural land for development to be considered 'in the round' alongside other considerations. Paragraph 29 of PPS7 suggests that LDFs should identify where areas of agricultural land are planned for development, and provides scope for the Local Planning Authority to identify where best and most versatile agricultural land can be developed, having carefully weighed up the options. In this context, the identification of the site in the LDF does not conflict with PPS7

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**Representor Number** 16 **Representation Number** 5468

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### *Summary of Representation*

The Core Strategy Amendment includes a plan at page 33 showing where the constraints to residential development at Caister are located (including Flood Zones 2 and 3, Nature Conservation Sites and County Wildlife Sites). Neither Nova Scotia Farm nor Pointers East are affected by these constraints. The Core Strategy Amendment also refers to development to the north of Caister as being unsuitable because of the loss of gaps between Caister and the settlements of Ormesby St Margaret and Scratby and coastal erosion. However the development of the two aforementioned sites would not have the effect of coalescence between settlements nor are they affected by coastal erosion (they are nowhere near the coast). Neither will the sites be located beyond the bypass nor with they have a detrimental effect on the landscape quality. It is therefore illogical that Nova Scotia Farm and Pointers East are not considered for development to meet the shortfall in housing in the Borough to 2025.

**Representor Number** 16 **Representation Number** 5469

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Cw and J Cargill object to the approach taken to allocating additional dwellings in the Borough, as there should not be significant development in Martham. Martham is a large village and not a Key Service Centre and should therefore be considered after Caister and Bradwell.

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**Representor Number** 40 **Representation Number** 5532

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Meadows

**Representing**

***Summary of Representation***

Our objection is to CS5 Table 6 Settlement Hierarchy. This we feel stifles development in Burgh Castle - especially for those who wish to live in Burgh Castle and young people who were born here and wish to remain here with family. Also it is not a flood area.

**Representor Number** 16 **Representation Number** 5470

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

It is clear that the Council has underestimated the projected shortfall of housing in the Borough to 2025 (estimated at 800 dwellings but this assumes 2000 dwellings will be delivered in the URC Area), so in reality there will be a much higher shortfall. For the reasons outlined above Caister, as Key Service Centre, should be included as an option to accommodate the additional residential development and in particular, Nova Scotia Farm and Pointers East would help address this shortfall. The current Core Strategy is therefore unsound in its approach.

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**Representor Number** 16 **Representation Number** 5471

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 3

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill do not believe that the approach should allow for additional dwellings to be allocated to settlements further down the Settlement Hierarchy as there is adequate capacity at the existing Key Service Centres (e.g. Pointers East and Nova Scotia Farm) to accommodate the additional change.

**Representor Number** 67 **Representation Number** 5778

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The East of England Plan also seeks appropriate levels of development in appropriate locations, including ensuring ongoing delivery of homes over the RSS period. For Great Yarmouth, the focus is on brownfield land, but there is a recognition that housing will be required to meet local housing needs. Allocating growth to South Bradwell does not undermine these aims. It will still enable appropriate, available and deliverable brownfield land to come forward first, but also provide alternative opportunities to meet housing needs, should constrained brownfield sites not come forward as expected. It will also give some certainty to the location of longer term housing development areas beyond 2025. Persimmon Homes (Anglia) are aware that the East of England Regional Assembly (EERA) are embarking on the early stages of a review of the RSS, looking at the potential for higher housing figures, to help meet national house building aspirations. Identifying the South Bradwell site as a development location will provide the flexibility for the LDF to take account of higher figures if required by the East of England Plan review.

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**Representor Number** 67 **Representation Number** 5779

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The need to regenerate the Great Yarmouth central core is accepted. The identification of Bradwell as a growth location will not prejudice the future development of brownfield sites in the URC area. Persimmon Homes (Anglia) accept that the Council's and 1st East's priority will be to help bring forward appropriate, available and deliverable brownfield sites. However, there will still be a requirement to meet housing needs throughout the plan period. This will not be possible through brownfield sites alone. Growth at Bradwell will provide the opportunity to meet a different housing need than residential development in the URC area. It will mainly focus on family type units, but with scope for the provision of other types and tenures if required through the consideration of the Council's Housing Market Assessment. Development in the URC area is likely to be higher density apartment and townhouse style development, mostly for single people or couples, with some lower density units elsewhere. It will also bring about complimentary infrastructure improvements to those being provided through the implementation of the URC Area Action Plan.

**Representer Number** 22 **Representation Number** 5484

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

***Summary of Representation***

In regards to phasing we think that in line with practice in other Core Strategies, it would be appropriate, if major development is proposed in Bradwell, for the Core Strategy to give an indication of the expected timing of development. This will reduce uncertainty and assist the planning for and provision of the necessary infrastructure.

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**Representer Number** 14 **Representation Number** 5395

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB is currently not able to support either housing option, as there is insufficient information to conclude that there will not be an adverse effect of the proposed housing delivery on designated sites. An AA must be provided for us to assess fully the soundness of the document and the options outlined.

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**Representer Number** 45 **Representation Number** 5570

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

Both the options shown above have the opportunity to deliver sustainable development. However, on balance Option 2 is favoured as this focuses development in the main urban areas, in line with the sustainability objectives of the East of England Plan (Policy SS2: Overall Spatial Strategy) and the Borough's overall regeneration aims.

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**Representor Number** 16 **Representation Number** 5463

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Option 2: "allocate a site in Bradwell on greenfield land" CW and J Cargill object to this as it is not clear where the site is located and Nova Scotia Farm and Pointers East at Caister could be just as suitable as they are also in a Key Service Centre and are positioned in sustainable locations.

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**Representor Number** 16 **Representation Number** 5462

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Option 2: "allocate sites in Great Yarmouth and Gorleston on PDL" no objection in principle, providing the URC Area in Great Yarmouth is not relied upon to deliver 2000 dwellings to 2025.

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**Representor Number** 16 **Representation Number** 5461

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Option 1: "allocate a site in Martham largely on PDL" CW and J Cargill object to this as Martham is a large village, and not a Key Service Centre as is the case with Caister. Consequently this proposal conflicts with the Settlement Hierarchy identified on page 15 of the Core Strategy Amendment.

**Representor Number** 16 **Representation Number** 5460

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Option 1: "allocate a site in Bradwell on greenfield land" CW and J Cargill object to this as it is not clear where the site is located and Nova Scotia Farm and Pointers East at Caister could be just as suitable as they are also in a Key Service Centre and are positioned in sustainable locations.

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**Representor Number** 16 **Representation Number** 5459

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Option 1: "allocate sites in Great Yarmouth and Gorleston on PDL" no objection in principle, providing the URC Area in Great Yarmouth is not relied upon to deliver 2000 dwellings to 2025.

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**Representor Number** 14 **Representation Number** 5394

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Martham: Whilst we support development on brownfield, provided the highlighted caveat above is considered, the SHLAA should have been carried out as part of the SA and AA process. The SHLAA indicates how viable the housing delivery for each proposed site will be. It is highly important that this information is provided for consideration in the AA, as this provides the necessary information for determining whether the proposed housing delivery will have an adverse effect on designated sites.

**Representer Number** 14 **Representation Number** 5393

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Caistor on Sea: Whilst we support development on brownfield, provided the highlighted caveat above is considered, the SHLAA should have been carried out as part of the SA and AA process. The SHLAA indicates how viable the housing delivery for each proposed site will be. It is highly important that this information is provided for consideration in the AA, as this provides the necessary information for determining whether the proposed housing delivery will have an adverse effect on designated sites.

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**Representer Number** 14 **Representation Number** 5392

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Bradwell: Any development within Greenfield sites should be carefully controlled and not be constructed separately from the settlement. Biodiversity enhancements should be used to offset any habitat loss resulting from development.

Whilst we support development on brownfield, provided the highlighted caveat above is considered, the SHLAA should have been carried out as part of the SA and AA process. The SHLAA indicates how viable the housing delivery for each proposed site will be. It is highly important that this information is provided for consideration in the AA, as this provides the necessary information for determining whether the proposed housing delivery will have an adverse effect on designated sites.

**Representor Number** 14 **Representation Number** 5391

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Great Yarmouth and Gorleston (GYG): Whilst we support development on brownfield, provided the highlighted caveat above is considered, the SHLAA should have been carried out as part of the SA and AA process. The SHLAA indicates how viable the housing delivery for each proposed site will be. It is highly important that this information is provided for consideration in the AA, as this provides the necessary information for determining whether the proposed housing delivery will have an adverse effect on designated sites.

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**Representor Number** 42 **Representation Number** 5546

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

With regard to the options set out on page 35 of the document, we support option 1 which, to us, seems to be the more sustainable option. The SHLAA should allow for previously developed land within Great Yarmouth in particular to be advanced for allocation for housing subject of course to appropriate flood risk mitigation. We reiterate, that the apparent exclusion of PDL sites within the urban area of Great Yarmouth, where flood risk mitigation is in place, should not be precluded.

**Representor Number** 16 **Representation Number** 5472

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 3

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### *Summary of Representation*

It is suggested that the sought changes should be: reassess the predicted shortfall in housing to 2025 as it currently does not take into account the fact that 2000 dwellings will not be delivered in the URC Area due to problems with flooding, land ownership and viability and over reliance on flats. Furthermore, a third option should be introduced that to meet this shortfall in housing which allows for residential development at the Main Towns and Key Service Centres of Bradwell and Caister. This would be entirely in accordance with the general hierarchical approach proposed for the Core Strategy.

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**Representor Number** 46 **Representation Number** 5585

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

### *Summary of Representation*

In many ways this is the most important policy issue of all. There are major questions on timescale (2021 or 2025 or later), delivery - rate of build under RSS against actual numbers which are being built now and will be in future years Borough Amended Core Strategy has 7,240 dwellings to be built by 2025. East of England Plan policy H1 says 4,810 dwellings to be built between 2006 and 2021. East of England Plan is from 2006. The downturn in the housing market has been marked since then. CPRE do not believe the high housing numbers are deliverable. Quality employment is needed to justify the extra housing. Other infrastructure must be in place before housing developments are completed and occupied.

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**Representor Number** 67 **Representation Number** 5772

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon (Anglia) Ltd supports the Amendment to the Core Strategy's revised Spatial Strategy Housing policy (CS5 – Option 2) relating to accommodating all of the strategic greenfield growth at Bradwell (800 homes). The approach accords with National and Regional Planning policy and will help to achieve the Council's sustainability objectives.

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**Representor Number** 14 **Representation Number** 5390

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the policies presumption against development in flood risk areas, and protection designated sites and protected species.

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**Representor Number** 14 **Representation Number** 5389

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB welcomes the inclusion of a map identifying the flood risk area and nature conservation sites.

**Representor Number** 36

**Representation Number** 5505

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Mitchell

**Representing**

***Summary of Representation***

I am objecting to any proposed development on green belt land in the Bradwell area. You have described this land as "high quality agricultural land" in this document and with food shortages predicted in the future, any decision to build on precious agricultural land appears to be very short sighted.

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**Representor Number** 14

**Representation Number** 5388

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB support the siting of housing in appropriate locations, with a focus on using previously developed land before Greenfield sites. We encourage the Council to conduct a survey of the biodiversity importance of brownfield sites, and to map this information, prior to allocating sites for development. Brownfield sites can contain high levels of biodiversity in their own right. Paragraph 13 of PPS9- Biodiversity and Geological Conservation, directs planning authorities to retain biodiversity interest or incorporate it into development, where such significant interest exists on previously developed land.

**Representor Number** 14 **Representation Number** 5387

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

If screening of the proposed developments and employment growth determines that the Plan may have an adverse effect on Natura 2000 sites, we recommend that the Council discuss this with Natural England and the RSPB as soon as possible.

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**Representor Number** 67 **Representation Number** 5777

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

The Local Phase One Ecology reports that there are no fundamental ecological or biodiversity constraints at South Bradwell. The sites main features include woodland; scrub; grassland; arable; hedgerows; dry ditch; buildings; hard standing; and grazing land (Jews Lane; Clay Lane).

Development is unlikely to affect specific areas covered by national and international designations. There are no formal designations on the site and no specific BAP species or habitats are likely to be affected by development. Breeding birds, bats and reptiles will be considered in detailed planning proposals. The site's development offers significant opportunities for habitat enhancement in priority areas.

**Representor Number** 67 **Representation Number** 5776

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Identification of the site does not result in the loss of large tracts of Grade 1 agricultural land, and the loss of Grade 1 and 2 land can be justified given the benefits of providing a development area well related to the existing built up area, close to facilities, services and jobs etc.

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**Representor Number** 16 **Representation Number** 5464

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill have very strong objections to the approach taken to allocating additional dwellings in the Borough. The Core Strategy identifies the Settlement Hierarchy at page 15 of the document and lists Great Yarmouth and Gorleston as main towns, with Bradwell and Caister as Key Service Centres (KSCs). The Core Strategy guides most new development to the main towns and Key Service Centres, and this approach is supported as they are the most sustainable locations in the Borough. It is therefore illogical in the Council's approach that Caister (a Key Service Centre) is not even considered as an option for new development to accommodate the additional dwellings required to meet the shortfall in housing to 2025. This cannot be correct as it is one of the settlements identified for new development in the Core Strategy. This inconsistency in applying the settlement hierarchy shows that the Core Strategy is unsound.

**Representer Number** 67 **Representation Number** 5774

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The identification of the South Bradwell site (between the A143 and Beacon Park) in the LDF will help the Council to respond to these aims. It will help provide for a range and mix of housing types and tenures, including affordable housing. It is unaffected by flood risk and will ensure the ongoing supply of suitable, deliverable and available development land for the longer term, to meet housing and community infrastructure needs. It is well related to the existing urban area and within walking/cycling distance of employment areas and a number services and facilities in Bradwell, Gorleston and the rest of the Great Yarmouth urban area.

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**Representer Number** 16 **Representation Number** 5458

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

### *Summary of Representation*

The two options proposed on page 35 of the document, to meet the shortfall in housing numbers, are either to allocate sites in Great Yarmouth, Gorleston, Bradwell and Martham or to allocate sites in Great Yarmouth, Gorleston and Bradwell are not supported by CW and J Cargill.

**Representer Number** 57

**Representation Number** 5690

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### *Summary of Representation*

When allocating land for development PPS1, PPS3 and PPS25 refer to sequential approaches to site selection such as prioritising previously developed land ahead of Greenfield land and locating development within areas at least risk of flooding ahead of flood risk areas. By precluding land outside the main towns and key service centres from being considered as potential housing allocations, despite such an approach requiring the allocation of land within areas at high risk of flooding and potentially the allocation of Greenfield land, would not therefore necessarily result in the Borough's housing needs being provided for in the most sustainable and appropriate manner or in line with the sequential approaches advocated in national guidance. This is especially the case given that there are appropriate development opportunities on previously developed land, which is not at risk of flooding, within other settlements such as Hemsby. It is therefore inappropriate for the Core Strategy to restrict housing allocations in this manner and in doing so remove the flexibility in subsequent DPDs to define housing allocations in the most appropriate and sustainable manner.

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**Representer Number** 55

**Representation Number** 5671

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Smith (S)

**Representing**

### *Summary of Representation*

I am unable to comment fully on the Amendments as a vital document which would have helped to inform my comments - the Strategic Housing Land Availability Assessment (SHLAA) - was not finalized at the time of this consultation period.

**Representor Number** 55

**Representation Number** 5672

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Smith (S)

**Representing**

***Summary of Representation***

Our best and most versatile agricultural soil must be protected from development and saved for future generations. Once lost is cannot be replaced. Development targets for brownfield sites must be achieved.

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**Representor Number** 56

**Representation Number** 5673

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Rogers

**Representing**

***Summary of Representation***

Option 4 is preferred (previous Issues and Options). This option gives a blank canvas for planning proposals allowing amenities, open spaces and general well being and access to the countryside.

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**Representor Number** 52

**Representation Number** 5638

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 3

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

If the 800 dwellings cannot be allocated within the identified main towns, key service centres and large village of Martham without compromising the above environmental issues, then development should be considered within the other settlements provided the infrastructure (such as sewage) exists to support further growth. We would expect allocations to be in flood zone 1 in accordance with your draft policy on flood risk (CS11).

**Representor Number** 59 **Representation Number** 5706

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Brookes

**Representing**

***Summary of Representation***

(In relation to development at Bradwell) Lack of leisure facilities, lack of schools, doctors and dental facilities. Congested roads especially during school peak hours.

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**Representor Number** 59 **Representation Number** 5707

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Brookes

**Representing**

***Summary of Representation***

(in relation to development at Bradwell) Environmental issues concerned with the green belt area. No clear boundaries between Belton and Bradwell. Development would cause lack of privacy, and proposed development would overlook gardens. No clear development plans have been submitted.

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**Representor Number** 60 **Representation Number** 5715

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

I think that the A12/A143 link road is a real possibility to meet both housing and industrial land needs.

**Representor Number** 57

**Representation Number** 5693

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### *Summary of Representation*

It is therefore requested that the policy eventual policy: does not limit residential allocations solely to the main urban areas and key service centres, thereby allowing appropriate sites in other settlements to be considered as potential housing allocations in subsequent DPDs; does not specify the amount of development which is to be directed to the urban regeneration area / other sites or settlements, thereby allowing greater flexibility for subsequent DPDs to ensure that the necessary housing allocations are provided in the most sustainable / appropriate manner and in line with the sequential tests advocated in national guidance; allows for greater provision of development within other settlements such as Hemsby; includes adequate safeguards to ensure that sufficient development comes forward to meet the housing needs of the Borough and the requirement of PPS3 to ensure a continuous 5 year supply of deliverable housing land. In this regard if a large proportion of the Borough's housing needs are to be directed towards the URC Area then the Core Strategy ought to allow for a greater amount of residential development than the minimum thresholds in the RSS, so as to reflect the significant deliverability problems associated with the URC Area.

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**Representor Number** 67

**Representation Number** 5789

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 1

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

Persimmon Homes (Anglia) Ltd contend that at least 800 homes need to be allocated at Bradwell to ensure that the community infrastructure, including the remaining section of the A143 to Beacon Park link road and properly functioning SuDs schemes etc. can be delivered. Persimmon Homes (Anglia) Ltd contend that the residual housing allocation (800 homes) should not be allocated to settlements further down the Settlement Hierarchy.

**Representor Number** 57 **Representation Number** 5691

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Whilst RSS Policy SS3 requires development to be concentrated at Great Yarmouth Policy SS4 recognises the role of market towns and larger villages in providing employment and services to their rural hinterlands and meeting housing needs. RSS Policy SS9 also promotes the regeneration of coastal towns and communities, whilst Policy CS1 of the draft Core Strategy suggests that within the larger villages development will be allowed which increases sustainability by maintaining and enhancing the level of services, facilities and jobs, or to meet the needs of the settlement and its immediate area. The level of development being directed to settlements outside the main areas and key service centres is not however sufficient to enable this to occur. In this regard when existing dwelling completions have been taken into account the proposed options are essentially proposing to allow just 320 dwellings to be completed outside Great Yarmouth, Gorleston, Bradwell and Martham over the next 15 years. This is insufficient when considering that there are over 14 other settlements within the Borough, including settlements such as Hemsby which the draft Core Strategy acknowledges could be treated as a key service centre.

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**Representor Number** 60 **Representation Number** 5714

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

CS5 shows a concerning over reliance on the URC area for housing.

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**Representor Number** 57 **Representation Number** 5689

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### *Summary of Representation*

Being reliant on the URC Area delivering 61% of the Borough's residual housing needs to 2025 could undermine the ability of the Borough to ensure that its development needs are met and ensure that there is a continuous deliverable 5 year supply of housing available as required by PPS3. In this regard the URC Area Action Plan Preferred Option acknowledges that actual take up rates will be determined by the market and will depend upon a wide range of factors outside the control of 1st East and its partners, including macro-economic conditions and mortgage costs. In particular it states that 1st East does not have any capital funds and that there is limited public funding available meaning that the URC proposals require significant investment from the private sector. Viability issues are therefore crucial. Given the current financial climate and housing market conditions, together with other flood risk, access and remediation issues, means there are significant deliverability issues affecting the URC Area. If it is considered that 2,000 dwellings are required to facilitate the URC objectives then it would be prudent to make provision within the LDF for a greater proportion of housing development elsewhere within the Borough even though this would mean exceeding the 7,240 dwelling requirement specified in the RSS. The RSS allows for this in so far as Policy H1 clearly states that the requirement is a minimum target to be achieved rather than a maximum ceiling which should not be exceeded. Such an approach is particularly appropriate when considering that the current proposed policy stance would effectively limit new residential approvals within the remaining settlements outside Great Yarmouth, Gorleston, Bradwell and Martham to just 320 dwellings over the next 15 years. The proposed 10% contingency for sites not coming forward, which does not even include the URC area dwellings, is considered entirely insufficient.

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**Representor Number** 67 **Representation Number** 5784

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The South Bradwell/Gorleston area has previously been identified by the Borough Council as an area suitable for accommodating future development to meet housing needs (Draft Local Plan). The principal of development of the area has therefore previously been accepted by the Council, but was never taken forward in the Adopted Local Plan as sufficient housing sites were provided elsewhere. Persimmon Homes (Anglia) contend that given the local need for housing and to ensure a sufficient supply of deliverable housing sites throughout the plan period and beyond, this designation should be reinstated by identifying the land as a sustainable urban extension.

**Representor Number** 57 **Representation Number** 5688

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

The supporting text to the draft policy suggests that as large areas of the Borough are in Flood Zones 2 and 3 the areas that are suitable for development are limited, which together with the established regeneration needs for Great Yarmouth justifies development being located within the URC Area despite its risk of flooding. Whilst there may be justification for development within the URC Area there are other appropriate development opportunities on previously developed land not at risk of flooding. There are also other planning objectives to be taken into account when considering the location of residential development. As such it is inappropriate for the Core Strategy to conclude at this stage that the most sustainable and appropriate means of providing for the Borough's housing needs is for some 61% of its residual housing requirement to 2025 being provided within the URC Area. Indeed draft Core Strategy Policy CS11 also requires it to be demonstrated that appropriate land at lower risk of flooding is not available before land in flood risk areas is developed for housing.

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**Representor Number** 57 **Representation Number** 5687

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### ***Summary of Representation***

The Core Strategy needs to provide sufficient flexibility for subsequent DPDs, such as the site specific allocations DPD, to consider all potentially available and suitable sites for residential allocation before determining the most sustainable and appropriate means of providing for the Borough's residual housing requirements in line with various policy objectives and the sequential approaches advocated in national planning policy statements. Such flexibility is significantly undermined if the Core Strategy pre-determines that 2,205 dwellings (67% of the Borough's residual housing requirement) are to be provided in the URC Area and at Beacon Park, Gorleston, or if it pre-determines the proportion of development which is to be provided within each settlement. To predetermine housing allocations in this manner will not necessarily result in the Borough's housing needs being met in the most sustainable and appropriate manner.

**Representor Number** 57 **Representation Number** 5686

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the options being presented for this policy in so far as they are both based on 2,205 dwellings being provided in the URC Area and at Beacon Park, Gorleston and neither option allows potential housing allocations outside the two main urban areas, the two key service centres and Martham. This is considered inappropriate.

---

**Representor Number** 1 **Representation Number** 5286

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

The focus for housing development within the URC area is welcomed and it is acknowledged that the revised housing figures can not be met by the URC sites alone and there would be a shortfall of 800 dwellings. However, whilst sites in the key service centres of Bradwell and Caistor on Sea will need to be identified to meet this shortfall, it should be specified that development will come forward in line with the sequential test and that development on these sites will take place towards the end of the plan period following development within the URC area. Clearly this will be considered further within the Development Control Policies and Site Specific Allocation DPDs, which will explore phasing and mechanisms for release.

**Representer Number** 64

**Representation Number** 5749

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

### *Summary of Representation*

The housing shortfall analysis highlights the shortage for new housing on previously developed land in Great Yarmouth. I would question this assumption as we have land available to the South West of our site and I believe there is land available to the East of Pasteur Road Retail Park and adjacent to the A12. These locations would fit the sequential test for Great Yarmouth and more suit the environmental issues we face than building out of town housing that would require additional travel for its occupants whether that be for professional or social reasons. We would like you to review the designation of available land within Great Yarmouth to meet your plan needs rather than either of the options you have mentioned.

---

**Representer Number** 62

**Representation Number** 5743

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Strutt & Parker

**Surname**

**Representing** Oxford Estates Limited

### *Summary of Representation*

In the same way as the overall spatial strategy, due to the constraints raised regarding the risk of flooding in the main towns, the quality of agricultural land surrounding the key service centres and the need to support the services and facilities within the Larger Villages such as Ormesby St Margaret, there should be a requirement to allocate a proportion of the additional housing requirement towards the Larger Villages.

**Representor Number** 63

**Representation Number** 5745

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Smith (RJ)

**Representing**

***Summary of Representation***

(Comments in relation to Bradwell Development) (a) insufficient schools; (b) Surface water and sewerage systems inadequate to take further volumes; (c) medical and dental facilities would not be able to accommodate further numbers; (d) the Gapton Hall roundabout and roads generally would not be able to take additional numbers. (e) there is insufficient parking in Great Yarmouth and the outer harbour will create congestion; (f) once greenfields are developed, they will never recover. In due course we could require the land for farmland should the EU disband and our own population has grown out of all proportion over the last few years. I know progress is inevitable but please get the horse before buying the cart.

---

**Representor Number** 57

**Representation Number** 5692

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Restricting housing development outside the main towns / key service centres to windfall development could undermine the ability to secure the positive regeneration and redevelopment of vacant previously developed land, particularly given the limited windfall allowance and the suggested policies in other draft DPDs which may seek to restrict windfall development to a limited number of dwellings. In this regard residential development can often be the catalyst to securing the regeneration / redevelopment of previously developed sites. The current policy approach of the draft Core Strategy would however significantly reduce the ability for housing development to be utilised in this manner in relation to land outside the main urban areas and key service centres. This is considered inappropriate especially as there are already vacant previously developed sites within larger villages such as Hemsby which would be appropriate for housing and where re-development / re-use needs to be secured in order to prevent such sites becoming dilapidated and obsolete to the detriment of the locality.

**Representor Number** 67 **Representation Number** 5788

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Finally, it is Persimmon Homes (Anglia) Ltd view that identifying the South Bradwell/Gorleston sustainable extension in the LDF will not prejudice the development of the URC area; neither will it undermine the Council's wider regeneration aims for the town. Persimmon Homes (Anglia) contend that the two approaches are not mutually exclusive.

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**Representor Number** 52 **Representation Number** 5634

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We note you consider the cost implications of developing contaminated sites are a constraint to development. Whilst we appreciate remediation can be expensive, developing such sites provides an opportunity to help environmental, social and economic regeneration and we generally strongly support it.

**Representor Number** 67 **Representation Number** 5785

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

Persimmon Homes (Anglia) suggest that by identifying the South Bradwell/Gorleston area as suitable location for a sustainable urban extension, the Core Strategy would:

Better reflect the Council's own evidence base, by acknowledging the potential deliverability problems of brownfield and urban sites, particularly those affected by flood risk;

Provide the flexibility to take account of changing circumstances by identifying an alternative development site that could be brought forward sooner if and when required;

Provide a strategy capable of delivering sufficient numbers of housing for 15 years following adoption and throughout the plan period;

Provide the opportunity to complete the South Bradwell access road;

Provide for a longer term strategy, capable of delivering higher housing numbers beyond the plan period; and

Provide the Council with the confidence to accept an uplift in housing that may be expected through the RSS review process to meet existing and future local housing needs.

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**Representor Number** 67 **Representation Number** 5786

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

### *Summary of Representation*

The South Bradwell/Gorleston sustainable urban extension will also deliver other benefits for the area, by helping to provide for a range of housing types and tenures to meet local needs; enabling provision of a softer more landscaped urban edge to the town; providing homes accessible by many means other than just the private car, in a location well related to other parts of the town, services, facilities and jobs; and deliver the remaining sections of the South Bradwell Access road (between the A143 and Beacon Park), an important and long standing Council aspiration. Existing neighbourhoods and communities will benefit from the provision of new services and facilities, better transport links and improvements to infrastructure capacity.

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**Representor Number** 47 **Representation Number** 5598

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Planning Uplift

**Surname**

**Representing** Alston

***Summary of Representation***

It is doubted that the town and immediate suburbs of Great Yarmouth are adequate to take the proposed level of development without significant environmental detriment given projected future flooding and traffic problems.

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**Representor Number** 47 **Representation Number** 5599

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Planning Uplift

**Surname**

**Representing** Alston

***Summary of Representation***

It is not possible to solve all the borough's housing needs within the immediate Great Yarmouth/Gorleston area without detriment to the sustainability of other settlement in the Borough and without damaging social and community links of the people who live (and want to live) in them.

**Representor Number** 52 **Representation Number** 5635

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Development should be allocated with regards to the PPS 25 Sequential Test. We do not have a strong preference to either policy however both Bradwell and Martham appear to have considerable opportunity to allocate land in Flood Risk Zone 1. The SA has assessed both options as having the same effects although acknowledges some sites in Great Yarmouth and Gorleston maybe at risk of flooding. This would not be acceptable and not in line with Core Policy CS11 which states no housing will be permitted in the Flood Zone with the exception of the URC area where it is needed to promote regeneration.

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**Representor Number** 52 **Representation Number** 5636

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 1

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

With regards to other environmental constraints, neither policy appears to have a particularly significant impact. The Appropriate Assessment will ensure that nature conservation sites of European Importance are unaffected.

**Representer Number** 52 **Representation Number** 5637

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Question 2

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We consider the approach is appropriate. It appears to have due regard to a number of environmental constraints including flood risk, coastal erosion and designated sites.

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**Representer Number** 47 **Representation Number** 5600

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Planning Uplift

**Surname**

**Representing** Alston

***Summary of Representation***

Of the remaining settlements in the Great Yarmouth District, Martham is the most sustainable location for new development for the reasons given in our previous submission.

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**Representer Number** 60 **Representation Number** 5716

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Beacon Park is an employment area and should be included in the accessibility discussion.

**Representor Number** 67 **Representation Number** 5787

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section** Option 2

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon Homes (Anglia) Ltd suggests that the Core Strategy should therefore confirm Bradwell as a suitable location for growth, and indicate the approximate level of development to be at least 800 homes, and other associated uses. Persimmon Homes (Anglia) Ltd contend that this level of development is necessary to ensure that the South Bradwell to Gorleston access road and other community infrastructure can be funded. This will also give Persimmon Homes (Anglia) Ltd the confidence to prepare more detailed proposals for the area to ensure its timely delivery.

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**Representor Number** 50 **Representation Number** 5603

**Policy/Chapter/Paragraph** CS5 Meeting the Housing Needs

Internal Ref#

12

**Sub Section**

**Company/Organisation**

**Surname** Maitland

**Representing**

***Summary of Representation***

Whilst I am in agreement with Policy CS5, I would object to the locations for additional housing requirement being limited to the main towns of Great Yarmouth and Gorleston, Key Service Centres of Bradwell and Caister and Martham. I believe that this should be increased to include the additional larger villages of Belton, Hemsby, Hopton on Sea and Ormesby St Margaret, even if it means consideration of greenfield sites or potentially suitable sites out of existing boundaries.

**Representor Number** 14 **Representation Number** 5396

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Housing Density: Whilst it is important to “safeguard the countryside from unnecessary development” it is important that this is not at the expense of wildlife. Development should incorporate biodiversity enhancement wherever possible. This should include GI, but additional measures, such as ‘swift bricks’ that provide nesting opportunities in new buildings, should also be used. Developed areas can also reduce insect abundance, which has been linked to reduced bird abundance in urban areas. Measures such as habitat creation must be undertaken to ensure that sufficient food is available for wildlife.

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**Representor Number** 16 **Representation Number** 5473

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill support the provision of 35% affordable housing on land comprising 15 dwellings (or 0.5 hectares or more). The Pointers East and Nova Scotia development would deliver 35% affordable housing which would help address the shortage across the Borough.

**Representer Number** 39 **Representation Number** 5529

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Shelter

**Surname**

**Representing**

### *Summary of Representation*

Shelter notes the proposal in the draft policy CS6 to negotiate with developers "to determine 35% affordable housing as a provision on-site for development on land comprising 15 (or 0.5 hectares or more) to secure sustainable communities" Whilst on the face of it this accords with the target in the adopted Regional Spatial Strategy for the East of England. Shelter considers that a higher target of at least 40% should be specified in the Policy in order to reflect the following

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**Representer Number** 39 **Representation Number** 5530

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Shelter

**Surname**

**Representing**

### *Summary of Representation*

The failure to secure from developers any significant affordable housing provision in the Borough in recent years. It is noted from the Council's most recent AMR that in the 7 years to March 2008 only 30 such dwellings were secured out of just under 2000 dwellings completed in that period. i.e. 1.5%. The backlog created alone points to a need for a higher target than that in the RSS. The 2007 Housing Market Assessment indicates a shortfall of 484 affordable housing units between 2007 and 2012. Whilst it is recognised that even a 100% target for affordable housing would not completely meet this shortfall Shelter considers that a target higher than 35% is required and justified. There is no reason to believe that in the current climate the need for affordable housing will reduce. A target of 35% for development of 15 units or more will mean that given the lack of an affordable housing target for smaller sites the total provision of affordable housing will be less than 35% and therefore below the RSS target. Therefore, a higher percentage figure is required for larger developments.

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**Representer Number** 46 **Representation Number** 5586

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Proposals say 35% affordable for Great Yarmouth from Housing Market Assessment (HMA). Strategic Housing Market Assessment (SHMA) PPS3 and notably page nine point 22. CPRE want a more local, rather than sub-regional SHMA. Some developments in Great Yarmouth need 40% or 50% affordable proportions. The 35% applies elsewhere in the Borough.

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**Representer Number** 39 **Representation Number** 5531

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Shelter

**Surname**

**Representing**

***Summary of Representation***

The policy makes no reference to the split of affordable housing between social rented and intermediate housing. In this respect, Shelter considers that the policy should require that at least 65% of affordable housing is social rented, whilst recognising that the RSS envisages an even higher percentage.

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**Representer Number** 38 **Representation Number** 5514

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Affordable Housing? We tried this i.e. Empsons Loke and Hales House. Best decide whether we are in the flood zone or not. Good room for discussion but very complicated.

**Representor Number** 16 **Representation Number** 5474

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

In accordance with the advice in PPS 3 some flexibility should be introduced where viability considerations may prevent full delivery of affordable housing. The policy should be adjusted to take account of this.

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**Representor Number** 60 **Representation Number** 5727

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Why are there no risk for affordable housing

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**Representor Number** 45 **Representation Number** 5576

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

The East of England Plan sets a target of 35% affordable housing on new housing coming forward.. Therefore policy CS.6 is welcomed.

**Representor Number** 45 **Representation Number** 5577

**Policy/Chapter/Paragraph** CS6 Affordable Housing, Tenure, Size, Density

Internal Ref#

13

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

It is considered that the Borough Council should reduce the threshold from 15 to 5 dwellings in rural areas in order to help address rural need.

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**Representor Number** 38 **Representation Number** 5515

**Policy/Chapter/Paragraph** CS7 Gypsies, Travellers

Internal Ref#

14

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Not convinced on commitment when there is so much ambiguity.

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**Representor Number** 52 **Representation Number** 5639

**Policy/Chapter/Paragraph** CS7 Gypsies, Travellers

Internal Ref#

14

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

You should be aware that we will object in principle to any allocations for the permanent siting of caravans, mobile homes and park homes in Flood Zone 3. PPS 25 regards this type of land use a 'highly vulnerable' which is considered inappropriate in areas of high flood risk (refer to tables D.1, D.2 and D.3 of PPS 25).

**Representor Number** 14 **Representation Number** 5397

**Policy/Chapter/Paragraph** CS7 Gypsies, Travellers

Internal Ref#

14

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB is pleased to note that site allocations for gypsies and travellers will be designed to have "no adverse impact on areas of acknowledged significance, in particular, areas of biodiversity and geodiversity importance." Any proposals will need to be subject to an AA.

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**Representor Number** 44 **Representation Number** 5564

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The starting point for the Core Strategy is therefore to acknowledge the village's potential to function as a Key Service Centre, and then to provide a spatial planning framework to enable the village (and perhaps others like it) to fulfil this role, including a strategy for the village's employment base to diversify into year round employment.

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**Representor Number** 34 **Representation Number** 5499

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Business Link East

**Surname**

**Representing**

***Summary of Representation***

I was puzzled to see a bold statement on skills in the sentence that starts "Education and training providers will be supported...". This is a major issue for the economy of the Borough. While it may not be appropriate to include a detailed strategic action plan on this issue in the LDF, it would be good to offer some clue as to how a spatial activity focus can contribute to "supporting the providers".

**Representor Number** 46 **Representation Number** 5587

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

More quality employment is needed in the Borough. Regeneration of South Denes and 95% of employment provision in this area is supported. Outer harbour supported. Use of rail and water transport with Norfolk and the rest of the UK should be encouraged and actively supported.

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**Representor Number** 14 **Representation Number** 5401

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Sustainability Appraisal: We support the concerns of the SA about development within flood risk zones. Mitigation will be necessary, and this should be provided as part of a wider flood management Strategy.

**Representer Number** 64

**Representation Number** 5750

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

In your analysis of land for employment needs much the same appears to apply as my comments on housing. There seems to be no consideration of the areas I have mentioned which I understand are currently designated as employment land. They are outside the South Denes, Runham Vauxhall, Gapton Hall and Harfreys areas that have been identified or the greenfield sites that have been mentioned but again are more more suited to meeting the sequential tests than some of those. Could you let me know why these areas are excluded given their current status/

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**Representer Number** 1

**Representation Number** 5287

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

This policy is supported by 1st East as new employment will come forward in line with the settlement hierarchy with a particular focus on regeneration within the URC area and is consistent with our aims and objectives within the emerging AAP.

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**Representer Number** 44 **Representation Number** 5561

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund objects to Policy CS8 of the Amendment to the Core Strategy's (Meeting Employment Needs). The Crane Executive Pension Fund acknowledges the policy's mention that villages will contribute to '...economic regeneration through diversification of local economic activities, where sustainable'. However, the Crane Executive Pension Fund suggests that this approach does not go far enough in providing a positive policy approach for villages including Hemsby, and objects on the basis that the Core Strategy's fails to specifically acknowledge that villages, including Hemsby which are currently heavily biased towards seasonal employment, require a positive spatial planning framework that allows for the diversification of the employment base to provide year round employment opportunities.

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**Representer Number** 52 **Representation Number** 5641

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In line with the Sequential Approach advocated by PPS 25, we would expect developments of a lesser flood risk vulnerability to be located in areas of highest flood risk. This is noted within the SA where it acknowledges PPS 25 places preference on industrial uses in the flood zone over residential uses. Whilst sequentially it is preferable to allocate these uses in the flood zone the risk must still be fully considered. This is acknowledged within the SA. Discussions with your emergency planner will be critical to establish if the emergency infrastructure can cope with the proposed growth.

**Representor Number** 44 **Representation Number** 5562

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund consider that since Hemsby meets four of the five criteria for designation as a Key Service Centre (Amendment to the Core Strategy, page 20), it ought to be identified as such in the Core Strategy ( see the Crane Executive Pension Fund's representation on CS1)).

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**Representor Number** 44 **Representation Number** 5563

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund acknowledges that Hemsby's employment base is at present predominantly seasonal. However, for this very reason the Core Strategy should set out an employment strategy that seeks to redress this imbalance by enabling Hemsby to change its employment base to diversify into year round employment. The Crane Executive Pension Fund suggests that to limit Hemsby's role as predominately tourism based service village leaves it in a very precarious position given the nature of tourism in this part of the Borough.

**Representor Number** 44 **Representation Number** 5567

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund suggests that the Meeting Employment Needs Policy (CS8) is changed to: Include a specific objective to plan for a diversification of the employment base at villages such as Hemsby to year round employment; Acknowledge that Greenfield sites will need to be identified to provide 'fit for purpose' employment premises in villages, including Hemsby, to deliver a strategy of employment base diversification to year round employment.

---

**Representor Number** 14 **Representation Number** 5400

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Outer Harbour: Any works relating to the port and Outer Harbour should be assessed in-combination with the policies outlined in the Core Strategy.

---

**Representor Number** 14 **Representation Number** 5399

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Biodiversity enhancement should be built into all development projects.

**Representor Number** 44 **Representation Number** 5565

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund suggest that this is likely to require the Site Allocations process to allocate greenfield sites for employment and other uses in Hemsby, given the finite supply of previous developed land in the village.

---

**Representor Number** 60 **Representation Number** 5719

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

What is the position regarding Thamesfield Way?

---

**Representor Number** 3 **Representation Number** 5313

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

EEDA welcomes the inclusion of broad locations of search for employment land provision to ensure the implementation of the 5,000 jobs required by the Draft East of England Plan in policy CS8.

**Representer Number** 44 **Representation Number** 5566

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Crane Executive Pension Fund

***Summary of Representation***

The Crane Executive Pension Fund can confirm that they control land at Martham Road (Bridge Farm) Hemsby, and are actively promoting its release for development. The site has potential for an employment led mixed use development scheme, potentially to also include small scale retail and perhaps housing. The intention would be to provide year round employment opportunities for local people and contribute to the creation of a more mixed and balanced community. The other uses would be included to provide flexibility and ensure the scheme's viability. The site has previously been registered with the Council through the Strategic Housing Land Availability Assessment (SHLAA) process.

---

**Representer Number** 14 **Representation Number** 5398

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB is pleased that the focus of development will be brownfield sites, but please see our comments for Strategic Objective SO1 above for a caveat to this approach.

**Representor Number** 52 **Representation Number** 5640

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

### *Summary of Representation*

Table D.2 classifies development according to its flood risk vulnerability. Whilst the majority of employment land will be classified as 'less vulnerable' (e.g. general industry, retail, storage) some is also considered 'more vulnerable' (e.g. drinking establishments, hotels, educational facilities) and some water compatible if it can be demonstrated that a waterside location is essential to the operation of the proposed use (e.g. port facilities). For this reason you should refer to Table D.3 to be clear where you will also need to apply the Exception Test.

---

**Representor Number** 60 **Representation Number** 5718

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

### *Summary of Representation*

Jobs may now have been lost from the 2001 baseline.

---

**Representor Number** 60

**Representation Number** 5801

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Land in the South Denes allocated for industry needs to be maximised.

---

**Representor Number** 3

**Representation Number** 5314

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

It will important to express that the Council will work not only with the Regional Planning Body, but also the URC and EEDA to encourage the development of sectors and clusters.

**Representor Number** 57 **Representation Number** 5694

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the proposal to locate 95% of the B1 and B2 land requirements to the regeneration waterfront redevelopment areas and the remaining 5% of B2 requirement at Harfreys and Gapton Hall Industrial Estates. It is contended that the distribution of employment development in this manner does not provide a variety of sites to meet differing needs and help create sustainable communities as is suggested in the policy, especially with regards to the larger villages and other smaller settlements. Many of the objections raised in relation to Policy CS5 are also applicable to this policy.

---

**Representor Number** 60 **Representation Number** 5717

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

I cannot see how 95% of the B2 land will be provided in the Regeneration/Waterfront areas, especially if the Runham Vauxhall plans remian for waterbased tourism. B2 needs to be allowed at Beacon Park and in other areas i.e. Thamesfield Way and Pasteur Road.

**Representor Number** 60

**Representation Number** 5728

**Policy/Chapter/Paragraph** CS8 Meeting the Employment Needs

Internal Ref#

15

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

There is a real risk of insufficient land for B2 unless the unsupply is addressed either at Beacon Park or elsewhere.

---

**Representor Number** 57

**Representation Number** 5695

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the statement that existing tourism uses will be protected as this could be interpreted as suggesting that the redevelopment of a tourist site to an alternative use will be precluded. There are instances where the continued use of land for tourism is either no longer appropriate or is commercially unviable / unrealistic. There are also instances where sites in tourism use could be better served meeting alternative development needs. As such it would be inappropriate for the LDF to place a blanket ban on the redevelopment of any existing or former tourism site for alternative uses. This is particularly the case given the need to maximise the use of previously developed land opportunities and recycle vacant and dilapidated land.

**Representer Number** 57 **Representation Number** 5697

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to reference in the draft policy to the Prime and Secondary Holiday Accommodation Areas being consolidated in line with the recommendations in the Appropriate Land Uses in the Secondary Holiday Areas, Great Yarmouth Study. It is contended that some of the prime holiday accommodation areas defined in the Local Plan are outdated and the boundaries need reviewing as part of this LDF, yet this is not reflected in the aforementioned study. As such it is considered inappropriate for the Core Strategy to state that these areas will be consolidated in line with the conclusions of this study. Sufficient flexibility should be retained within the Core Strategy to enable the boundaries of these prime holiday accommodation areas to be reviewed in subsequent DPDs.

---

**Representer Number** 7 **Representation Number** 5338

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Theatres Trust

**Surname**

**Representing**

***Summary of Representation***

This policy contains all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Borough. Good quality community and cultural facilities are essential components in the development of sustainable communities. It is important to provide, protect and promote cultural and leisure facilities for their leading role in the quality of life for residents and for their valuable contribution to the character and function of Great Yarmouth for visitors.

**Representer Number** 57 **Representation Number** 5698

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

It is requested that the policy be amended to clarify that the loss of existing tourism uses to other uses is not automatically precluded, therefore providing sufficient flexibility for other DPDs to adopt appropriate criteria based policies. It is also requested that the reference to the Appropriate Land Uses in the Secondary Holiday Areas, Great Yarmouth Study be deleted, with the boundary definition of prime and secondary holiday area boundaries left for consideration in relation to the production of subsequent DPDs.

---

**Representer Number** 29 **Representation Number** 5491

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning

**Surname**

**Representing** Northen Racing

***Summary of Representation***

We support the general thrust of this policy, particularly its specific reference to the Great Yarmouth Racecourse. This to some extent reflects our client's wishes as set out in our earlier representations to Policy CS19 to the Core Strategy Pre-Submission stage.

**Representor Number** 52 **Representation Number** 5643

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are pleased to see you have acknowledged that a policy will be required within the Development Control DPD to address the issue of coastal erosion on existing tourism uses.

---

**Representor Number** 61 **Representation Number** 5731

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Greater Yarmouth Tourist Authority

**Surname**

**Representing**

***Summary of Representation***

The further degradation of Great Yarmouth (page 46 paragraph 6) as a tourist destination by making reference to Gorleston as 'a more salubrious tourism and visitor offer' does little to assist in promotion of the Borough's tourism industry.

---

**Representor Number** 29 **Representation Number** 5493

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning

**Surname**

**Representing** Northen Racing

***Summary of Representation***

The protection of the 'status quo' does nothing to respond to changing market conditions or needs, nor does it cater for compensatory provision for any reduction in existing visitor provision.

**Representer Number** 57 **Representation Number** 5696

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

### *Summary of Representation*

It is contended that any policies seeking to protect existing tourism uses ought to be criteria based policies, which allow the release of tourism land for other uses in certain circumstances. Such circumstances could include when the land is no longer suitable or viable for continued tourism use, or the land is surplus to requirements for tourism, or the proposal would not have a significant detrimental impact on tourism etc. This is the approach in the Norfolk Structure Plan in so far as Policy EC.10 is a criteria based policy. Furthermore RSS Policy E6 refers to including policies in local development documents which encourage "realistic and sustainable" investment in the maintenance, improvement, regeneration, extension and diversification of the region's tourist industry. As such the draft Policy ought to clarify that any subsequent tourism policies seeking to protect existing tourism sites will be criteria based and will not automatically preclude the loss of any existing / former tourism sites for alternative uses.

---

**Representer Number** 52 **Representation Number** 5642

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

### *Summary of Representation*

You should be aware that we will object in principle to any allocations for the permanent siting of caravans, mobile homes and park homes in Flood Zone 3. PPS 25 regards this type of land use as 'highly vulnerable' which is considered inappropriate in areas of high flood risk (refer to tables D.1, D.2 and D.3 of PPS 25). Caravan and camping sites for holiday or short let are considered to be 'more vulnerable'. Therefore if these allocations are within the flood zone they would be required to pass the Sequential and Exception Test.

**Representer Number** 29 **Representation Number** 5492

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning

**Surname**

**Representing** Northen Racing

***Summary of Representation***

It is considered that even at this Core Strategy stage, it should be made clear that not only will the main tourist attractions "be protected to ensure they retain a wide range of facilities for visitors", but policy should also adequately address the potential for "related or complimentary" uses to be developed at the Racecourse.

---

**Representer Number** 5 **Representation Number** 5334

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

We do not consider the wording of the following paragraph (fifth paragraph of Policy CS9), referring to the Golden Mile, as appropriate as it does not adequately reflect the special character of the tourist area around the Golden Mile, in particular its openness. We consider that his new policy should mimic Policy TR21(b)(ii) of the previous adopted Great Yarmouth Borough - Wide Local Plan (adopted in 2001), which recognised this special character by stating; "The Council will require the retention of the open character of areas to the east of Marine Parade between Britannia pier and the Pleasure Beach, including the areas of public open space"

**Representor Number** 5 **Representation Number** 5331

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

### *Summary of Representation*

RPS welcomes references to the requirement that new tourist attractions be developed to a high standard. However, we are concerned that this policy does not specify that new commercial tourist attractions should be developed along the seafront to continue to concentrate tourism development there (it only makes reference to good connectivity with existing attractions). By revising this policy to specify this, the Council will confirm that it seeks to maximise the opportunities of enabling all visitors to the town to visit the many attractions, both existing and new, along the seafront by focussing commercial tourist attractions to locate there. Indeed, in the supporting text to Policy TR.2 of the previous Norfolk County Structure Plan (adopted in 1999), it was noted that in Great Yarmouth, the seafront should be considered part of the town centre for leisure and entertainment purposes. This in itself enabled most tourist attraction to locate to the seafront, ensuring such concentration continued to exist and therefore maximising benefits derived.

---

**Representor Number** 5 **Representation Number** 5332

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

### *Summary of Representation*

We request that the fourth paragraph of Policy CS9 to be replaced with the following; "New tourist accommodation and attractions and cultural facilities will be located according to the Settlement Hierarchy (see Policy CS1) and will be developed to a high standard in locations that provide good connectivity with surrounding tourist destinations and facilities by sustainable modes of travel. Commercial tourist attractions should be, in this respect, located along the seafront and primary holiday areas of Great Yarmouth"

**Representer Number** 5 **Representation Number** 5333

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

### *Summary of Representation*

We consider that the amended paragraph matches the purposes of The Edge leisure complex, which will introduce high quality cinema and casino facilities along with Great Yarmouth's first internationally-branded hotel and a number of up-scale restaurants and bars. The proposed development is intrinsically linked to the Pleasure Beach, both financially and spatially, with the family-orientated facilities immediately adjoining the Amusement Park, and will become a new landmark gateway to the main seafront area of Great Yarmouth. This will help to maximise footfall along the entire seafront.

---

**Representer Number** 14 **Representation Number** 5404

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

### *Summary of Representation*

The effect that increased tourism will have upon protected sites outside the Borough must also be considered. The Norfolk Broads and North Norfolk Coast have an intrinsic appeal that is likely to also attract visitors staying within the Borough. It is important that the Plan is assessed in-combination with Plans and projects from neighbouring Councils to determine that designated sites outside the Borough will not be adversely affected by the Plan.

**Representer Number** 60 **Representation Number** 5721

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Reference to former years as a tourist destination should be amended to reflect continuing importance.

---

**Representer Number** 5 **Representation Number** 5330

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

***Summary of Representation***

Our client welcomes a new policy in the CS which will deal specifically with tourism and culture proposals in Great Yarmouth, and specifically supports references to the Council supporting the upgrading and enhancement of accommodation and attractions in Great Yarmouth in the third paragraph of this policy.

---

**Representer Number** 60 **Representation Number** 5720

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Reference to salubrious tourism should be removed.

**Representor Number** 60 **Representation Number** 5722

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

*Summary of Representation*

Spelling - Categorises and Wellesley

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**Representor Number** 46 **Representation Number** 5588

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

*Summary of Representation*

CPRE supports sustainable tourism and culture in the Borough. The district is busy in the holiday season and the Borough Council should seek to increase the proportion of non-car journeys made. Tourism is seasonal and many jobs are low paid. High quality well paid employment all year round is needed in the Borough.

---

**Representor Number** 5 **Representation Number** 5335

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

*Summary of Representation*

We welcome the Council's support of the development of a 'Large' casino complex in Great Yarmouth which is well-related to existing tourist attractions and facilities, as set out in the eighth paragraph of Policy CS9. However, we consider that this policy should define where in the town such a development would be appropriate, not solely referring to it being 'well-related' to existing tourist attractions.

**Representor Number** 5 **Representation Number** 5336

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** RPS Planning Group

**Surname**

**Representing** Pleasure and Leisure PLC

### *Summary of Representation*

Evidence arising from the Government, Parliament and others' scrutiny of new-style casino proposals should dictate that 'Large' casinos should not be located in the heart of the town centre or other areas which may give rise to casual and convenient gambling opportunities, in addition to minimising adverse effects. As such, we request that the eighth paragraph of Policy CS9 (referring to the casino) should be amended as follows: "The Council supports the development of a large casino complex in Great Yarmouth which is well-related to existing tourist attractions and facilities but is not located within the primary shopping area of the town centre, or along the family-orientated seafront (i.e. between the Britannia Pier and the Pleasure Beach), nor elsewhere which would give rise to casual gaming opportunities or adversely affect neighbouring uses or its locality".

---

**Representor Number** 2 **Representation Number** 5301

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

### *Summary of Representation*

Bourne Leisure considers that policy CS9 should specifically include more detail, in terms of: - Supporting and encouraging the retention, consolidation, enhancement, diversification and intensification/expansion of existing holiday parks, subject to any necessary environmental/other development control criteria, particularly where proposals improve the range and quality of accommodation and facilities on a site and its setting in the surrounding landscape, and where the visitor season is extended. - Allowing for operators to undertake a phased approach to consolidation, improvement, upgrading or extension of existing holiday parks over several years, ensuring that the existing accommodation and visitor operation is not disrupted and that each proposal caters appropriately for current and forecast needs and demands. - Allowing for development within existing site boundaries or the expansion onto adjoining land, where sites are affected by coastal erosion.

**Representor Number** 2 **Representation Number** 5300

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure strongly supports paragraph 3 of Policy CS9. Bourne Leisure confirms that due to changing market trends, increasing visitor expectations and the competitive nature of the tourism industry, it is important that policies within the Core Strategy fully support the improvement of existing tourism accommodation and facilities.

---

**Representor Number** 68 **Representation Number** 5795

**Policy/Chapter/Paragraph** CS9 Tourism and Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** English Heritage

**Surname**

**Representing**

***Summary of Representation***

The casino should be assimilated carefully into the town to ensure that the character of the townscape and the setting of Nelson's Monument are protected. English Heritage has submitted comments separately in relation to the casino development proposals.

---

**Representer Number** 61

**Representation Number** 5733

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Greater Yarmouth Tourist Authority

**Surname**

**Representing**

### *Summary of Representation*

The Bone Wells report does recommend new policies including 'any application of change of use for a guest house, hotel or bed and breakfast accommodation will only be considered where: (a) detailed evidence can be provided that the building is no longer viable for visitor accommodation; (b) the proposal would result in a major upgrading of its structural condition and amenity of the area'. Indeed the 'Viability Test' issue was discussed at a recent meeting of the SHARP Planning Sub-Group in respect of a successful scheme used in Bournemouth and fully endorsed, as a principle, by the GYTA Board. Sadly no mention of 'viability tests' have been included in the Core Strategy nor specific references to the recommendations in the Bone Wells report that recommends changes to planning policies. Specifically the Bone Wells recommends that future frameworks include a policy that states: "to maintain and enhance its visitor appeal and to take advantage of potential changes in the demand for traditional seaside accommodation, it is important to safeguard hotels and guest houses".

---

**Representer Number** 52

**Representation Number** 5644

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

### *Summary of Representation*

We also commend the inclusion of habitat based tourism within the policy which could have numerous positive benefits.

---

**Representer Number** 1 **Representation Number** 5288

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

This policy is supported to a large extent. However it should be emphasised that regeneration within the URC area will provide attractions and cultural facilities that will compliment the more traditional tourist attractions such as the Golden Mile.

---

**Representer Number** 14 **Representation Number** 5403

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The impact that increased tourism could have on designated sites must be assessed to ensure that there will be no adverse effect. To do this it is important that baseline data on visitor numbers at key locations are assessed now as part of the SA and AA process. This information can then be used as a baseline for comparison in future monitoring. It must be noted that monitoring is not a mitigation measure, as it does not prevent an impact from occurring.

---

**Representer Number** 14 **Representation Number** 5402

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the Council's proposal to "encourage development that supports habitat creation and enhancement schemes and nature conservation as a focus for habitat-based tourism." New habitat should be sited appropriately and suitable management plans devised.

**Representor Number** 61 **Representation Number** 5732

**Policy/Chapter/Paragraph** CS9 Tourism, Culture

Internal Ref#

16

**Sub Section**

**Company/Organisation** Greater Yarmouth Tourist Authority

**Surname**

**Representing**

***Summary of Representation***

Paragraphs 1 and 2 on page 48 referes to 'The Study' but fails to clarify which study. The GYTA Board is aware of the Bone Wells study into secondary accommodation which makes no recommendations 'to form consolidated predefined clusters' nor does it recommend removing Trafalgar Road from the SHAA. The GYTA Board is concerned that the current text could misguide the reader into thinking that clustering has been agreed GYBC. The GYTA Board understands that GYBC has not agreed the principle of clustering and have yet to be convinced that clustering is the right approach.

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**Representor Number** 38 **Representation Number** 5516

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Page 49 refers to local centres (us) being maintained etc. Hope this means that GYBC will be there in 2011 to support Winterton when the next round of Post Office closures are announced.

**Representor Number** 65 **Representation Number** 5758

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

### *Summary of Representation*

In respect of out of centre retail development, the policy states that retail and town centres uses outside of defined centres will be required to demonstrate that there is a need, there are no sequentially preferable sites available, are accessible by sustainable transport, and have no adverse effects on the viability and vitality on defined centres, including those beyond the borough boundary. This part of the policy regurgitates national policy and should be deleted. The policy should refer to national guidance but does not need to repeat it. For example, the policy may need to be re-drafted to reflect the proposed changes to PPS (July 2008) which indicates that it is the Governments intention to remove the need test.

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**Representor Number** 65 **Representation Number** 5759

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

### *Summary of Representation*

Policy CS10 makes no reference to existing and well established retail destinations in out of centre locations. CBRE Investors believes that existing out of centre retail destinations such as Gapton Hall Retail Park should be acknowledged within the Core Stratetgy. These facilities plan an important role in bringing retail expenditure into the borough to compliment the town centre and it is important to note the their existence and to continue to seek regeneration in order to promote competition and consumer choice. These types of retailers that are prepared to occupy retail park units are constantly evolving, especially in this time of economic uncertainty . It is therefore important for Gapton Hall Retail Park to continue to be able to offer flexible accommodation in order to remain attractive and competitive.

---

**Representer Number** 65 **Representation Number** 5760

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

CBRE Investors request that Gapton Hall Retail Park, and other retail parks, be acknowledged as established retail destinations that serve as an important role in the Borough. Any new proposed development within Gapton Hall should be assessed against PPS 6 but should also be recognised as being key to the regeneration of existing facilities.

---

**Representer Number** 65 **Representation Number** 5761

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

It is important to continue to attract new tenants/shoppers to Gapton Hall Retail Park to avoid the stagnation of the retail park and the loss of tenants and the associated local employment. The constant regeneration of Gapton Hall will act as a catalyst for the profitability and success of the retail park and will enhance the capability of the site to generate expenditure and local employment.

---

**Representer Number** 67 **Representation Number** 5790

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon (Anglia) Ltd contends that given Bradwell's role as a location for strategic growth, it should be identified as a District Centre in the retail hierarchy, alongside Caister-on-Sea.

**Representor Number** 14 **Representation Number** 5405

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the Councils approach to be focused on 'brownfield' sites. A caveat to this though, is the importance that brownfield sites may have in supporting biodiversity within urban areas. This point is reflected in paragraph 13 of PPS9- Biodiversity and Geological Conservation, which states "where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities, together with developers, should aim to retain this interest or incorporate it into any development of the site." For example, Canvey Wick in Thames Gateway was the first brownfield site designated as a Site of Special Scientific Interest (SSSI) for its invertebrates. The key issue for the RSPB is that biodiversity should be protected and enhanced wherever it is found, in order to deliver national and international commitments.

---

**Representor Number** 14 **Representation Number** 5406

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

It should be made explicitly clear that Green Infrastructure will be incorporated in any development.

---

**Representor Number** 16 **Representation Number** 5475

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill support the retail hierarchy set out under Policy CS10. Caister-on-Sea is listed from the top (after Great Yarmouth and Gorleston) and is classed as a District Centre. Given that Caister-on-Sea is a District Centre it is therefore suitable to accommodate further residential development (e.g. Pointers East and Nova Scotia Farm).

---

**Representor Number** 60 **Representation Number** 5723

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Where did the figure of 15,000m2 come from? This seems a very large and unrealistic for retail alone in The Conge.

**Representer Number** 52

**Representation Number** 5646

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

In line with the Sequential Approach advocated by PPS 25, we would expect developments of a lesser flood risk vulnerability to be located in areas of highest flood risk. This is noted within the SA where it acknowledges PPS 25 places preference on industrial uses in the flood zone over residential uses. Whilst sequentially it is preferable to allocate these uses in the flood zone the risk must still be fully considered. This is acknowledged within the SA. Discussions with your emergency planner will be critical to establish if the emergency infrastructure can cope with the proposed growth.

---

**Representer Number** 1

**Representation Number** 5289

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

The retail hierarchy is supported with preference given to the main town centre of Great Yarmouth. Although the majority of retail development will fall within the existing town centre, the acknowledgement of the role of mixed sites in the AAP areas is welcomed.

**Representor Number** 46 **Representation Number** 5589

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Already a Tesco and Asda on the edge of Great Yarmouth, plus a B&Q and Gapton retail units. No further provision in these, edge of town, sites to protect other retail areas.

---

**Representor Number** 14 **Representation Number** 5407

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

There should be a presumption against building in flood risk areas. We would expect policies to indicate that development will not affect future flood alleviation, attenuation or management opportunities. Flood risk is an important issue for the area and it is not clear how this is to be addressed. We suggest that a flood risk management plan is created to provide information to direct developments and ensure suitable measures to deal with flood risk are adopted.

---

**Representor Number** 64 **Representation Number** 5751

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

The retail area plans the standard sequential test relative to the town centre, have been included. I have understood that a wider competition test could also be included relative to more out of town development where retailers do not wish to be in the town centres due to bulk goods. Could you confirm that this will be included within the Retail Hierarchy you describe?

**Representer Number** 14 **Representation Number** 5408

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

### *Summary of Representation*

Whilst it is important to “safeguard the countryside from unnecessary development” it is important that this is not at the expense of wildlife. Development should incorporate biodiversity enhancement wherever possible. This should include GI, but additional measures, such as ‘swift bricks’ that provide nesting opportunities in new buildings, should also be used. Developed areas can also reduce insect abundance, which has been linked to reduced bird abundance in urban areas. Measures such as habitat creation must be undertaken to ensure that sufficient food is available for wildlife.

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**Representer Number** 52 **Representation Number** 5645

**Policy/Chapter/Paragraph** CS10 Retailing and Leisure Uses

Internal Ref#

17

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

### *Summary of Representation*

Table D.2 classifies development according to its flood risk vulnerability. Whilst the majority of employment land will be classified as ‘less vulnerable’ (e.g. general industry, retail, storage) some is also considered ‘more vulnerable’ (e.g. drinking establishments, hotels, educational facilities) and some water compatible if it can be demonstrated that a waterside location is essential to the operation of the proposed use (e.g. port facilities). For this reason you should refer to Table D.3 to be clear where you will also need to apply the Exception Test.

**Representor Number** 2 **Representation Number** 5302

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure acknowledges the importance of ensuring an appropriate approach to planning new development in areas of flood risk, and supports the risk-based sequential test as set out in PPS25.

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**Representor Number** 2 **Representation Number** 5307

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure considers that existing coastal development such as theirs should continue to be protected, even where they are not expressly identified as a priority within any Shoreline Management Plan. As a minimum, and in regard to tourism operations, Core Strategy and Shoreline Management Plan policies should seek to hold and maintain the existing defence line, in order to allow for tourism operators in coastal locations to retain, fund and implement appropriate coastal defence works, to protect their property and to enable them to continue to operate and improve their businesses.

**Representor Number** 2 **Representation Number** 5308

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure therefore strongly considers that in order to ensure the long term future viability of uses, such as holiday parks, CS11 should both allow for coastal defences to be implemented and maintained where this allows operators to "hold the line" and also, allow for the consolidation, improvement and intensification of existing uses within the existing site boundary and the extension onto adjoining land.

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**Representor Number** 1 **Representation Number** 5290

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

Although the majority of the URC area falls within the high risk flood zone, the support within this policy for development in the area is welcomed, emphasising the exception test and the importance of wider sustainability objectives.

**Representer Number** 2 **Representation Number** 5306

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Specifically in relation to the Kelling to Lowestoft Shoreline Management Plan (SMP) Review 2006, Bourne Leisure notes that the SMP Review details anticipated losses at Casitor on Sea (no loss up to 2025 and 2055, but loss of 50 residential, commercial properties and seafront holiday centres and caravan parks by 2105) and Hopton (loss of less than 5 seafront properties and sea front tourist accommodation by 2025 and loss of 10 seafront properties and further loss of seafront tourist accommodation by 2105).

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**Representer Number** 2 **Representation Number** 5305

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Furthermore, and in relation to properties affected by coastal erosion, Policy CS11 should support proposals for development within existing site boundaries (including the development of undeveloped areas) or proposals to expand onto adjoining land not affected by coastal erosion (including making use of existing open space), to compensate for land lost as a result of coastal erosion. This more flexible approach would allow climate change consequences to be adapted to by existing development more readily.

**Representor Number** 2 **Representation Number** 5304

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

In relation to coastal erosion, Bourne Leisure considers that policy CS11 should be drafted to ensure that risks from coastal erosion and instability are minimised and that appropriate coastal defence works should be implemented. The Company also considers that priority should be given to defending existing properties, particularly as it is often impractical and financially unviable to relocate existing development, such as hotels and holiday parks, away from the coast, particularly where the land has been owned/occupied for along time and was therefore bought at a much lower cost.

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**Representor Number** 2 **Representation Number** 5303

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

The Company would emphasise that when considering flood risk in relation to development proposals, the Core Strategy's policy should be redrafted to take account of: the specific characteristics and vulnerability of the proposed land use (for example, certain tourism uses need to be, or to remain located adjacent to water); whether the residual risks of flooding to development makes a positive contribution to reducing or managing flood risk. In particular, the Company considers in regard to consolidation and expansion of existing tourism accommodation and holiday park sites within flood risk areas, that only the extent of the new development site within or adjacent to the existing hotel/holiday park, and not the whole site, should have to be assessed sequentially.

**Representor Number** 67 **Representation Number** 5791

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon (Anglia) Ltd notes that in relation to the Amendment to the Core Strategy's Flood Risk and Coastal Protection Policy, Bradwell is an appropriate area of land at a lower risk of flooding, as described in criterion 1 of the policy.

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**Representor Number** 52 **Representation Number** 5649

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

".....land will not be allocated for highly vulnerable or more vulnerable uses (including houses) in areas at high risk of flooding. The only exception is within the Urban Regeneration Company (URC) Area when the development contributes to the delivery of the regeneration objectives in Policy CS4 and the URC Area Action Plan, and the above criteria can be met...."

---

**Representor Number** 38 **Representation Number** 5517

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Page 54 says land will not be allocated for housing in areas of high flood risk. Winterton questions that statement.

**Representor Number** 16 **Representation Number** 5476

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill support the first sentence of the second paragraph on page 54 which states: "Land will not be allocated for highly vulnerable and more vulnerable uses (including houses) in areas at high risk of flooding"

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**Representor Number** 16 **Representation Number** 5477

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

Major objections are raised in the paragraph that states: "The only exception is within the Urban Regeneration Company (URC) Area when the development contributes to the objectives in Policy CS4 and the URC Area Action Plan, and that the above criteria can be met" Very strong concerns are raised in relation to the vulnerable residential development proposed in the URC area which falls within an area of medium to high risk of flooding (Flood Zones 2 and 3).

**Representor Number** 16 **Representation Number** 5478

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

CW and J Cargill accept that the regeneration of the URC Area is important but the flood risk problems outlined in the Core Strategy underpin the concerns that have been previously expressed regarding the undue reliance that the Council have placed on delivering 2000 dwellings in this location. The Core Strategy states that all applications in the URC area will be accompanied by a detailed Flood Risk Assessment (FRA), which clearly demonstrates that the development is appropriate in terms of its type, siting and the mitigation measures proposed, including where necessary enhancement of flood defences and/or effective sustainable drainage measures. This level of detail required and the uncertainty of the outcomes of the various FRAs further reduces the substantial reliance the Council have placed on the URC Area delivering 2000 dwellings.

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**Representor Number** 16 **Representation Number** 5479

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Pegasus Planning Group

**Surname**

**Representing** Cargill

***Summary of Representation***

It is suggested that the sought changes should be: to reassess the predicted shortfall in housing to 2025 as it currently does not take into account the fact that 2000 dwellings will not be delivered in the URC Area due to problems with flooding and land ownership.

**Representor Number** 52 **Representation Number** 5651

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

The amendments to the policy ensures that it is consistent with PPS 25 and strengthens the reference to SuDS, which can contribute to numerous environmental, social and economic benefits. We acknowledge that due to the high water table in your Borough, and the contaminated nature of many of the sites in the URC area, infiltration SuDS may not be preferable but developers must explore other methods. There is a wide range of SuDS techniques and it is normally feasible to find a solution to surface water management. The benefits of SuDS are recognized within your SA.

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**Representor Number** 41 **Representation Number** 5534

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Broads Internal Drainage Board

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

"..where technically possible". There could be situations where it would be "technically" possible to use SUDS, but this would certainly not be the best option. I therefore feel this may be better altered along the lines of "...where such methods will provide an efficient drainage system"

**Representor Number** 42

**Representation Number** 5547

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

The Marsh Farm site is located within the urban area of Great Yarmouth, the most sustainable settlement in the District; immediately adjoining the URC defined area and is within easy walking distance of the town centre and all its services and amenities. The site is a brownfield site and has been in permanent residential use for more than 40 years but is now in need of redevelopment. We believe that the redevelopment of the site for housing would accord with strategic objectives 1,2,3 and 4 of the Plan as well as draft Policy CS1. Clearly the site is located within the Cobholm Ward, one of the key wards on which redevelopment and renaissance is to be focussed.

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**Representor Number** 42

**Representation Number** 5548

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

In this particular case, redevelopment of the site for housing would reduce the risk to life from flooding as the site is currently occupied by a "highly vulnerable" use.

---

**Representor Number** 42 **Representation Number** 5549

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

In that redevelopment proposals within the URC area will need to meet the criteria of this policy then, unless the URC area is to be defended as an island, flood risk mitigation for that area would equally protect the Marsh Farm site.

---

**Representor Number** 42 **Representation Number** 5550

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

The inequitable application of policies to adjacent sites of equal characteristics is not helpful to either part as the exclusion of the area from renewal and renaissance will create a disincentive to investment and the further run-down of property interests, and ultimately compound problems of economic and social degeneration.

---

**Representor Number** 42 **Representation Number** 5551

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Paul Sharpe Associates

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

The Council is therefore requested to review this policy alongside Policy CS4 and devise a policy by which regeneration outside the defined URC area (subject to appropriate caveats) is positively encourages rather than positively discouraged as would be the outcome of current draft policies.

**Representor Number** 52 **Representation Number** 5650

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

".....Development proposals will not increase the risk of flooding on or off site, and must be supported by a site specific Flood Risk Assessment (FRA) where required. The use of sustainable drainage systems will be required unless, following an adequate assessment, it is demonstrated that they are not appropriate..."

---

**Representor Number** 46 **Representation Number** 5590

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Climate change must be fully considered in the implementation of this policy. Locations identified as at risk of flooding, away from regeneration areas, should not be developed. In regeneration areas, as identified by the Urban Regeneration Company, (URC) appropriate flood works should be a priority. Sustainable Urban Drainage Systems should be part of developments.

---

**Representer Number** 57 **Representation Number** 5699

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Whilst there may be justification for development within the URC Area despite it being at significant risk of flooding the current draft Core Strategy proposes to locate over 60% of the Borough's residual housing land requirements to 2025 within this area, which may not be justified if there are alternative appropriate sites available which are not subject to flood risk. Accordingly all sites within the URC should not be treated as an exception in terms of needing to comply with the sequential tests of PPS25 and it is inappropriate for the Core Strategy to pre-determine in other policies that some 2,000 dwellings are to be provided in the URC Area.

---

**Representer Number** 52 **Representation Number** 5647

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are pleased that you have stated within the policy that land will not be allocated for highly vulnerable and more vulnerable uses in areas at high risk of flooding, with the exception of the URC area where it is required for regeneration. As previously stated, the latter must be supported by the Sequential and Exception Test in line with PPS 25.

**Representor Number** 64 **Representation Number** 5752

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

*Summary of Representation*

Under flood risk, I have understood that the URC area for Great Yarmouth had passed the Environment Agency's exception test but this is not mentioned here. If they have I assume this section will be written but I would appreciate confirmation that they have.

---

**Representor Number** 52 **Representation Number** 5648

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

*Summary of Representation*

To ensure these policies complies with PPS 25, we recommend the following changes:  
...Development proposals should avoid areas at "risk of flooding (Flood Zone 2, 3a and 3b, as defined by PPS25)" unless it can be demonstrated that....

---

**Representor Number** 52 **Representation Number** 5652

**Policy/Chapter/Paragraph** CS11 Flood Risk and Coastal Protection

Internal Ref#

18

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

*Summary of Representation*

In the supporting text on page 55 (paragraph 5) please make clear that both the Sequential and Exception Test are still required for development in the URC area. This will remain the case until you have an adopted site allocations DPD.

**Representor Number** 2 **Representation Number** 5310

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing**

***Summary of Representation***

The necessity of car travel in certain circumstances is recognised in the CLG Good Practice Guide "Planning for Tourism" (May, 2006) and Bourne Leisure considers that its advice should be reflected fully in the emerging Core Strategy, with reference to accessibility. (See rep for additional text)

---

**Representor Number** 14 **Representation Number** 5411

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Improving road and rail infrastructure must be considered on a wider scale than the Borough level.

---

**Representor Number** 14 **Representation Number** 5410

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB would support "providing a continuous and attractive pedestrian and cycle access along the River Yare", but such provision must be mindful of nature conservation interests. The route needs to be carefully assessed to ensure that no adverse impact to designated sites occurs during construction or because of increased disturbance.

**Representer Number** 64

**Representation Number** 5753

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

The transport assessment correctly identifies the increasing level of congestion in Great Yarmouth and that one of the key factors that will alleviate it is a third river crossing. However our current knowledge of major capital infrastructure spends, potentially put the creation of a third river crossing as far away as post 2020 therefore some shorter term remedial action needs to be considered in relation to the key bottlenecks of Gapton and Vauxhall roundabouts and the Haven bridge particularly as these will additionally be impacted by traffic flows from the new port.

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**Representer Number** 64

**Representation Number** 5754

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Pasta Foods

**Surname**

**Representing**

***Summary of Representation***

Whilst aware of the planned signalling improvement planned for Gapton Hall that was only capable in the model of handling traffic effectively to 2013 and I am not aware of any other major road improvement planned. The point is made well in the report that infrastructure improvement and capacity must come forward before development therefore I would expect there to be significantly more on the interim plans to improve the traffic flows at the three bottlenecks I have mentioned above and can find no mention within the report which is to be key to infrastructure development over the next ten years in order to support GY business an growth needs.

**Representor Number** 22 **Representation Number** 5486

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

***Summary of Representation***

The supporting text to Policy CS12 fails to comment on and/or consider the cumulative effects of major development including the third river crossing and potential development at Bradwell on the A12. The JPH is concerned to ensure that such potential impacts have been/will be assessed and mitigated (including possible constraint on emergency vehicles gaining access to the Hospital).

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**Representor Number** 65 **Representation Number** 5762

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

CBRE Investors support the objective of Policy CS12 to work in partnership to create accessible sustainable communities. CBRE Investors support the commitment to improve public transport provision to existing employment areas including Gapton Hall Industrial Estate. Gapton Hall Retail Park is located on key primary and secondary transport corridors. This location should be exploited in terms of improving public transport provision by way of bus and cycle.

**Representor Number** 1 **Representation Number** 5291

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** 1st East

**Surname** Wakins

**Representing**

***Summary of Representation***

It is important to emphasise the key role that transport improvements including a third river crossing of the River Yare will play to realise the wider regeneration objectives. In addition regeneration has an important part to play in terms of opening up the waterfront with significant improvements in transport and cycling access.

---

**Representor Number** 46 **Representation Number** 5592

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

County Council responsible for highways whilst the A47 is a trunk road, so little mention of road schemes in policy CS12 noted. CPRE opposes dualling the Acle Straight on grounds of cost and environmental reasons. Traffic delays mostly occur within Yarmouth close to Vauxhall Station and Gapton Hall roundabouts and not on the A47 Acle Straight. Moreover it is projected in the East of England Plan that many more jobs will be created in the Norwich Policy Area such as at Norwich Research Park. A dualled Acle Straight will suck out sustainable development from the town.

**Representor Number** 46 **Representation Number** 5591

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Support cycle and public transport initiatives but seek a reduction in car usage. Great Yarmouth road layout not well suited to cars but fit in well with north to south bus routes. Distances are ideal for cycling.

---

**Representor Number** 14 **Representation Number** 5412

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

Where road and rail links are improved or constructed, having been deemed necessary, suitable mitigation must be provided to ensure that there is a limited impact on biodiversity. By ensuring such projects incorporate biodiversity enhancement and habitat creation, the Borough's sustainability and adaptation targets would also be supported.

---

**Representor Number** 60 **Representation Number** 5725

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

The Third River Crossing is the key requirement...and will give access to the seafront and 'Golden Mile'

**Representor Number** 45

**Representation Number** 5578

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

There is broad support for Policy CS.12, which is largely consistent with the LTP and the Transport policies contained in the East of England Plan. The key diagram includes the third river crossing which is seen as a priority and supported in the LTP and emerging Area Action Plan. However currently no proposed route has been defined, and therefore; It is strongly recommended that the legend in Figure 5 be relabelled to show as an area of search, that part of the Map covered by the Proposed Third River crossing.

---

**Representor Number** 65

**Representation Number** 5763

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Nathaniel Lichfield and Partners

**Surname**

**Representing** CB Richard Ellis

***Summary of Representation***

In addition to being a shopping destination, Gapton Hall Retail Park also generates a significant number of local jobs. Improving public transport links to the Gapton Hall Industrial Estates and Retail Park would therefore be beneficial to both shoppers and staff and would be welcomed by CBRE Investors.

**Representor Number** 60 **Representation Number** 5726

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

The economic benefits of the Third River Crossing need to be stated.

---

**Representor Number** 60 **Representation Number** 5724

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Great Yarmouth Borough Council

**Surname** Wright

**Representing**

***Summary of Representation***

Beacon Park should be included in (d) as an existing employment area.

---

**Representor Number** 2 **Representation Number** 5309

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure supports the general principles of Policy CS12, however the Company would emphasise that in relation to tourism uses, there is often no feasible alternative available other than the private car for reaching more remote areas, and that this constraint on the use of alternative means of transport should be recognised in any strategic objectives and policies for sustainable tourism-related travel within the Core Strategy.

**Representor Number** 14

**Representation Number** 5409

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports a policy that aims to reduce car travel and promotes travel by foot, cycling and public transport.

---

**Representor Number** 11

**Representation Number** 5346

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section** b)

**Company/Organisation**

**Surname** Ward

**Representing**

***Summary of Representation***

Objection is made to a pedestrian lifting bridge for the following reasons; Prohibitive cost (money can be better used); 3rd river crossing should have pedestrian and cycle access; and, obstruction to navigation.

---

**Representor Number** 11

**Representation Number** 5347

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section** e)

**Company/Organisation**

**Surname** Ward

**Representing**

***Summary of Representation***

The 3rd river crossing must include cycle and pedestrian access. This would encourage the use of cycling or walking from west to east, and vice versa, across the river.

**Representor Number** 11

**Representation Number** 5348

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section** Figure 5

**Company/Organisation**

**Surname** Ward

**Representing**

***Summary of Representation***

Cycle and pedestrian access stops midway along Southtown Road. This access should continue along the river as far as Gorleston Pier. This should be included as a goal even if not possible in the immediate future.

---

**Representor Number** 67

**Representation Number** 5792

**Policy/Chapter/Paragraph** CS12 Accessibility, Development and Sustainable Transp

Internal Ref#

19

**Sub Section**

**Company/Organisation** Bidwells

**Surname**

**Representing** Permission Homes

***Summary of Representation***

Persimmon (Anglia) Ltd objects to the Amendment to the Core Strategy's Accessibility, Development and Sustainable Transport Policy omission of the A143 to A12 South Bradwell Access Roads one of the key infrastructure improvements in the Borough. Persimmon (Anglia) Ltd suggests that the policy should include the A143 to A12 South Bradwell Access Road as one of the key infrastructure improvements in the Borough.

**Representer Number** 52

**Representation Number** 5653

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We commend the inclusion of points (j), (k), (l) and (m). The policy should also challenge developers to produce innovative designs which are likely to have multi-functional benefits including for the environment. Consideration of policies such as the government strategy 'Making Space for Water' and the SuDS manual early in the process will only enhance the final result. Point (k) could also include measures to improve water efficiency which will become increasingly important as resources deplete.

---

**Representer Number** 52

**Representation Number** 5654

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We note you state within the policy that major and sensitive development applications should be supported by a Code for Sustainable Homes assessment to demonstrate environmental performance. As we have mentioned previously there is a target for all development to be carbon neutral by 2016. The policy should reflect this and make this a target for all new development, not just that of a major nature.

**Representor Number** 4 **Representation Number** 5318

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

*Summary of Representation*

We welcome the provision of 'comprehensive landscaping' and the enhancement of 'features of biodiversity interest' within Core Policy CS13, and would recommend that these two aspirations are brought together within a more holistic green infrastructure strategy for the Borough - not looking at each housing allocation in isolation, but considering the ecological connectivity between sites and the opportunities for habitat creation.

---

**Representor Number** 14 **Representation Number** 5414

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

*Summary of Representation*

We support the need to "secure and enhance features of biodiversity interest including habitats, buffer areas and wildlife corridors." It is important that development is also used to create new habitat, and this should be added into the Policy statement.

---

**Representor Number** 14 **Representation Number** 5413

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

*Summary of Representation*

The RSPB supports the siting of new development in areas accessible by means other than the car.

**Representer Number** 68 **Representation Number** 5796

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** English Heritage

**Surname**

**Representing**

***Summary of Representation***

We suggest an additional category after j): 'secure and enhance the heritage features of the site and contribute positively to the qualities of the surrounding landscape and townscape'

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**Representer Number** 14 **Representation Number** 5416

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

In order to make sure that developments are as sustainable as possible, the RSPB would recommend that it be explicitly stated that houses are built to the Code for Sustainable Homes highest standards Levels 5 and 6 (BREEAM 'excellent' rating). Promoting higher targets than those currently proposed will make developments more sustainable and make the Council's efforts to reduce its contribution to climate change more effective.

---

**Representer Number** 14 **Representation Number** 5415

**Policy/Chapter/Paragraph** CS13 Design Quality

Internal Ref#

20

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

We are pleased that measures such as SUDS will be incorporated into development.

**Representer Number** 14 **Representation Number** 5417

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB strongly encourage the Council to adopt a policy that receives developer contributions from housing and, where appropriate, other types of development. By only obtaining contributions for housing this would greatly limit the benefits that could be obtained for open spaces and biodiversity protection and enhancement; such measures being important for sustainable and adaptable communities. Breckland District Council in their Area Action Plan has already adopted this option. They will seek contributions from all development via a pre-determined tariff system, with developers having to demonstrate why they would be exempt from contributing.

---

**Representer Number** 14 **Representation Number** 5418

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB believes that visitor access to the environment is important, and provides a valuable contribution to the local economy, but that increased access must be in a manner appropriate and sensitive to the conservation interests of the area. The Council must ensure that this policy does not encourage increased, uncontrolled or inappropriate disturbance from higher visitor numbers that could lead to the deterioration in the condition of designated sites. Increased recreational disturbance to SPAs and SACs will trigger the need for screening for AA of their likely significant effects. An access management plan will also need to be produced.

**Representor Number** 22 **Representation Number** 5488

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

***Summary of Representation***

A minor amendment should be made to Table 9 in order to identify the correct partner for this project as the James Paget University Hospitals NHS Foundation Trust and not as stated "Great Yarmouth and Waveney University Hospitals NHS Foundation Trust NHS".

---

**Representor Number** 46 **Representation Number** 5593

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Developers will be required to contribute appropriately in meeting the education, health, open space and recreation provision. This policy must be rigorously enforced.

---

**Represor Number** 21 **Representation Number** 5480

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Sport England East

**Surname**

**Representing**

### *Summary of Representation*

Sport England supports this policy, which is aimed to ensure that all community facilities (including sports facilities) are both protected (existing facilities) and provided for (new facilities) in appropriate locations. We also support the commitment to securing multiple uses of such facilities where appropriate. This is particularly important with regard to new sports facilities on school sites, which can also contribute to the wider community needs and which will be largely delivered through the Building Schools for the Future (BSF) programme, in respect of secondary schools.

---

**Represor Number** 7 **Representation Number** 5339

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Theatres Trust

**Surname**

**Representing**

### *Summary of Representation*

We have one comment to make regarding this policy, in that museums, art galleries and places of worship have been included. These items are not strictly speaking community facilities but belong in the 'family' of cultural facilities as they are not absolutely necessary for the health and well-being of residents. There could therefore be an overlap here with Policy CS9.

**Representor Number** 7 **Representation Number** 5340

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Theatres Trust

**Surname**

**Representing**

***Summary of Representation***

In our opinion community facilities tend not to be leisure orientated but provide for the more fundamental resources such as all levels of healthcare, all educational establishments and community centres. It is an important that a distinction is made so that even if you don't agree with our understanding of these terms it is important that our interpretation is understood in the context of your policies so that planning applications are assessed against a solid policy framework.

---

**Representor Number** 21 **Representation Number** 5481

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Sport England East

**Surname**

**Representing**

***Summary of Representation***

We have strong support for the development of policy in relation to open space provision, in that this will now be provided on the basis of a new PPG17 open space assessment, and therefore be based on a local evidence base of need, as required by PPG17. Sport England has published substantial guidance on preparing a playing pitch strategy as part of such an assessment and this guidance can be downloaded from our website.

**Representor Number** 21

**Representation Number** 5482

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Sport England East

**Surname**

**Representing**

***Summary of Representation***

My only concern is that there is a lack of local evidence to identify needs with regard to indoor facilities, as the proposed local assessment appears to only relate to open spaces, which would only cover outdoor pitches and other outdoor sports facilities. Widening the study to cover indoor sports facilities would provide robust evidence on the local needs and priorities for these facilities also. We would be happy to talk further on how Sport England could help with such an assessment if this would be helpful.

---

**Representor Number** 22

**Representation Number** 5487

**Policy/Chapter/Paragraph** CS14 Community Facilities

Internal Ref#

21

**Sub Section**

**Company/Organisation** Barton Wilmore

**Surname**

**Representing** James Paget Hospital

***Summary of Representation***

The provision within Policy CS14 (Table 9) and supporting text for a 2ha (approx) extension to the rear of the hospital is strongly supported. An extension to the site is necessary to enable the long term needs of the hospital to be met in the most sustainable and effective way. Development needs are expected to comprise the provision of new ward space, and out patient accommodation in order to meet the government standards together with the provision of new community-related healthcare facilities.

**Representor Number** 45 **Representation Number** 5579

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

The County Council feels that a rewording of section (f) of the Policy is required to take into account other possible evidence rather than simply relying on the Landscape Character Assessment. A suggested wording would be "Development should be sympathetic to and seek to enhance landscape character."

---

**Representor Number** 2 **Representation Number** 5292

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Nathaniel Lichfield & Partners

**Surname**

**Representing** Bourne Leisure

***Summary of Representation***

Bourne Leisure supports the general approach as set out in the first part of CS15, however Bourne Leisure considers that it will be important to balance objectives to preserve the environment with those which promote tourism as part of the overall economic strategy for the borough. Moreover, the Core Strategy policy and its supporting text should acknowledge that there is scope for appropriate development in areas adjacent to designated sites, provided that commensurate mitigation measures, such as the inclusion of a buffer zone and appropriate landscaping, can be implemented to minimise both direct and indirect impacts. Moreover, careful detailed design and layout of any development adjacent to the buffer zone can ensure limited access, a satisfactory interface in visual terms and natural surveillance.

**Representor Number** 57 **Representation Number** 5700

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the removal of the references in the former draft policies to maximising the use of previously developed land to minimise encroachment onto Greenfield sites and actively contribute to the future built environment.

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**Representor Number** 14 **Representation Number** 5419

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB support the Council's intention to protect, enhance and create habitat, as well as effectively manage it. We are very pleased that particular mention has been made of the little tern colony: "Providing for and contributing to the effective management, through the comprehensive mitigation, of the little tern colony at the North Denes and Winterton-on-Sea Special Protection Areas."

---

**Representor Number** 52 **Representation Number** 5657

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Policy ENV3 of RSS14 states that regard should be given to the need for species and habitats to adapt to climate change. This maybe a particularly significant issue in Great Yarmouth, especially in coastal areas where saline incursion may occur. Recognition that habitat compensation could be required should be considered within this policy.

**Representor Number** 14 **Representation Number** 5420

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

We are concerned, however, that whilst this Policy could greatly benefit the areas designated features, the earlier Policies may compromise the objectives of CS15. A full AA has not been completed at this stage and without this it is not possible to conclude that the Plan would not have an adverse effect on the designated features, particularly the little tern colony. Please see section 1 in Appendix 1 for our comments on the screening process.

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**Representor Number** 4 **Representation Number** 5322

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

Reference is made to the neighbouring Broads Authority area. Consideration should also be given to other adjacent authorities which share designated site boundaries with Great Yarmouth Borough Council, namely North Norfolk District Council and Broadland District Council. Assessing cumulative impacts - particularly in terms of water availability and quality - must involve an evaluation of the relevant policies within their Core Strategies.

**Representor Number** 8 **Representation Number** 5342

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Norfolk Wildlife Trust

**Surname**

**Representing**

***Summary of Representation***

We support this policy. Heathland is referred to in the context of Winterton. However, in the ecological network map (Figure 6) the heathland areas lie to the south of the borough around Fritton. We suggest that policy wording is checked in relation to the econet map. NWT would be happy to advise further on this.

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**Representor Number** 52 **Representation Number** 5656

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Given that you are seeking to redevelop large parts of the Borough, it would be advisable to include a point ensuring the biodiversity value of previously developed land is safeguarded. These sites often support a wide variety of invertebrates which can be retained with measures such as green and brown roofs. We note the SA recognizes mitigation is required to address this issue (page 15 and 61) but are concerned it is proposed to be included within the Residential Design Guide SPD which is not scheduled for adoption until 2012.

**Representor Number** 52 **Representation Number** 5655

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are pleased to see you acknowledge both the need to protect and enhance individual sites but also the need to take a holistic approach to improving the network of ecological sites both within your Borough and with the wider area. We would encourage you to include a point specifically relating to the requirements for new development along the lines of, 'the inclusion of beneficial features for biodiversity in new development and consideration of how these link into the surrounding area.'

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**Representor Number** 46 **Representation Number** 5594

**Policy/Chapter/Paragraph** CS15 Natural Environment

Internal Ref#

22

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

CPRE supports the rigorous enforcement of this policy and a proper and reasonable consideration of the natural environment in planning matters. The policy should not be ignored to allow inappropriate development, whilst suitable green developments should be encouraged. The environment is an important issue and must not be set aside, especially during the downturn.

---

**Representor Number** 57 **Representation Number** 5701

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the removal of the references in the former draft policies to maximising the use of previously developed land to minimise encroachment onto Greenfield sites and actively contribute to the future built environment.

**Representor Number** 38

**Representation Number** 5518

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

The policy states that a natural floodplain will be encouraged. This is objected to as it is against SMP guidance.

---

**Representor Number** 46

**Representation Number** 5595

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Support more renewable but consider wind farms should be offshore and only then at sites which are not detrimental to the natural environment or cause a visual impact. Demand for water will increase and recycling of grey water should be the norm. Rain water should be collected for uses such as watering gardens.

---

**Representor Number** 52

**Representation Number** 5658

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We support the inclusion of this policy and are pleased to see you have included measures to address renewable energy sources and increases in both energy and water efficiency.

**Representor Number** 52 **Representation Number** 5659

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We are particularly keen to ensure water efficiency in new development as although the Catchment Abstraction Management Strategy (CAMS) concluded that there was currently water available in the area, this status will change to 'no water available' within the plan period. This is acknowledged with your WCS scoping report. A strong policy within your Development Control DPD is therefore essential to ensure the prudent use of water. This is supported by policies WAT 1 and 3 of RSS 14 and the Regional Economic Strategy. It should also be noted that ensuring the CAMS achieve sustainable water use in a given catchment and achieving sustainable water supplies are not necessarily the same thing as the water company operate at a resource zone level and will get water from various catchments. The water cycle study appears to have understood this issue so it is just a point for information.

---

**Representor Number** 52 **Representation Number** 5660

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Furthermore we are pleased to note you intend to include targets for renewable energy regeneration within the Development Control DPD. Waste and water targets should also be considered and ambitious targets set to reduce the impact on the environment. As we have previously stated, this should include being carbon neutral by 2016. Opportunities will exist, especially within the URC area, for developments to become flagship examples of sustainable design and construction which will help you meet your core objectives.

**Representor Number** 14 **Representation Number** 5421

**Policy/Chapter/Paragraph** CS16 Natural Resources

Internal Ref#

23

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the Policy's promotion of sustainable use and protection of the areas natural resources. We are pleased that water conservation is given a high priority. We support the incorporation of renewable energy measures into development, but the type of energy production used must be sympathetic to the surrounding area. Wind turbines are a key concern, and must be suitably sited with respect to nature conservation sites.

---

**Representor Number** 68 **Representation Number** 5797

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** English Heritage

**Surname**

**Representing**

***Summary of Representation***

This policy is welcome and we support it. Notwithstanding this, the wording should be considered further to ensure that references are made to particular aspects of the district's heritage, and to the background information and appraisal work carried out which will be used to assess proposals eg. Conservation area appraisals, historic landscape assessments, Historic Environment Record sources. The format of this policy could be adapted to one closer to policy CS15 which includes both generic elements and reference to specific issues and guidance. We note also the comments in the Sustainability Appraisal (pg 31) regarding the vulnerability of archaeological remains and the distinctive character of towns and villages.

**Representor Number** 46

**Representation Number** 5596

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Some weight should be given to this policy in decision making. Yarmouth town walls and quayside are of heritage and cultural interest. Periodic review of conservation areas is needed to ensure the aims of this policy are achieved.

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**Representor Number** 45

**Representation Number** 5580

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

Core Policy CS 17 indicates the approach that will be taken by the Borough to conserve and enhance the historic environment. This approach is in general conformity to The East of England Plan and as such is welcomed. However, the following detailed comments are made:

- References to the Sites and Monuments Record should be amended to refer to the Historic Environment Record.
- In the Delivery Framework relating to CS.17, Norfolk County Council should be included as a Responsible Agency/Partner.
- It is recommended that bearing in mind the value of the many historic landscapes in the Borough, a further criteria point should be added to reflect the need for conservation of historic landscapes in the aims of core policy CS.17.

**Representer Number** 14 **Representation Number** 5422

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB supports the SA recommendation that protection measures for brownfield sites are provided and that wildlife in historic buildings be protected.

---

**Representer Number** 57 **Representation Number** 5702

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the removal of the references in the former draft policies to maximising the use of previously developed land to minimise encroachment onto Greenfield sites and actively contribute to the future built environment.

---

**Representer Number** 46 **Representation Number** 5597

**Policy/Chapter/Paragraph** CS17 Historic Environment

Internal Ref#

24

**Sub Section**

**Company/Organisation** Campaign to Protect Rural England

**Surname**

**Representing**

***Summary of Representation***

Welcome point (e) in text and CPRE looks forward to a record of non-listed buildings of interest being prepared.

**Representer Number** 12 **Representation Number** 5353

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Highways Agency

**Surname**

**Representing**

***Summary of Representation***

This should also extend to the monitoring of measure. There are no set targets in the strategy to measure increases in patronage of public transport, implementation of travel plans or reduction in trips.

---

**Representer Number** 8 **Representation Number** 5343

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Norfolk Wildlife Trust

**Surname**

**Representing**

***Summary of Representation***

(Table 8) We suggest inclusion of Green Infrastructure Strategy as an implementation measure for CS3 (as highlighted above)

---

**Representer Number** 8 **Representation Number** 5344

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Norfolk Wildlife Trust

**Surname**

**Representing**

***Summary of Representation***

(Table 9) The LAA Biodiversity indicator (NI 197) should be included under CS15, as this relates to the number of County Wildlife Sites in Positive Conservation Management

**Representer Number** 34 **Representation Number** 5500

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Business Link East

**Surname**

**Representing**

### *Summary of Representation*

My perception of pages 76 and 77 is that they include one paragraph on "delivery" (what will be done) and 10 paragraphs on "monitoring" (how we will check on what is being done). These two pages are followed by a very detailed table that gives 10 pages of delivery activity, followed by twelve pages of monitoring activity. Bearing in mind the current process of review of the LSp for Great Yarmouth, to improve its focus on delivery, I was surprised to find that the LSP is not mentioned more often as a delivery partner. For example, in meeting of the LSP transition team, we have certainly discussed delivery planning in areas that include CS3 and CS4. I would expect that the Economic Forum that sits within the LSP will also take an active interest in CS9.

---

**Representer Number** 14 **Representation Number** 5431

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

### *Summary of Representation*

CS7 Gypsies and Travellers: Targets: The protection and enhancement of specific designated sites and features should be mentioned, including their condition. The use of protection, enhancement and habitat creation to achieve BAP targets should be mentioned.

**Representor Number** 14 **Representation Number** 5429

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

### *Summary of Representation*

CS7 Gypsies and Travellers: Core Strategy Spatial Objective: We support the need "to ensure that the quality of the natural environment is protected and enhanced and ecological connectivity is improved across all parts of the Borough, including the Broads, sites of national and international importance, paying particular attention to Great Yarmouth's part of the Norfolk Coast Area of Outstanding Natural Beauty. To maintain sites subject to non-statutory designation and to raise awareness of, and promote accessibility, to locally important wildlife sites without damaging the integrity of these sites."

This important Spatial Objective should also be included in CS1, CS2, CS3, CS5 and CS6.

---

**Representor Number** 12 **Representation Number** 5354

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Highways Agency

**Surname**

**Representing**

### *Summary of Representation*

The delivery appears to be centred around a level of infrastructure provision without a clear understanding that sufficient funding sources are available to deliver them. Completion of the transport evidence work currently underway should clarify the level of infrastructure requirements needed during the plan period.

---

**Representer Number** 14 **Representation Number** 5428

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

CS2 Sustainable Development: Indicator: Biodiversity enhancement and habitat creation should be monitored to ensure that these measures have been adopted in proportion to the amount of development that has been undertaken. Ensuring suitable provision of such measures is important, as they allow adaptation to climate change and contribute to sustainability targets.

---

**Representer Number** 14 **Representation Number** 5426

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

CS15 Natural Environment: Dependencies: We support the Council's use of "developer contributions to manage, conserve and enhance the Little Terns colony at the North Denes and Winterton SPA." This is important in achieving the Council's obligation to manage, conserve and enhance the little tern colony.

---

**Representer Number** 14 **Representation Number** 5425

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

CS15 Natural Environment: Responsible Agencies/Partners: The RSPB should be included in this list as we run the little tern protection project.

**Representer Number** 14 **Representation Number** 5424

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

If baseline data indicated that no adverse effects were expected, on-going monitoring would still be needed to assess future visitor impacts and an appropriate reactive plan would need to be in place to avoid an adverse effect if one was detected. If an adverse effect cannot be excluded, however, it will be important to devise a plan for implementing necessary mitigation and monitoring, including suitable site and access restrictions to avoid an adverse effect. Consideration would need to be given to the speed with which mitigation measures could be implemented.

---

**Representer Number** 52 **Representation Number** 5661

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

We note you have included flood risk as being a constraint to the delivery of sites, especially within the URC boundary. As stated within our response, we need to discuss this issue to find a way forward so as not to compromise your strategy. Of course this will not prevent unforeseen situations, such as a change in our flood defence strategy. Therefore the delivery and monitoring strategy must be flexible enough to accommodate these circumstances, especially as such a large proportion of development is proposed in the URC area.

**Representer Number** 52 **Representation Number** 5662

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

It is important that the infrastructure requirements are identified to bring forward the development to ensure there is no adverse impact on the environment. We are particularly concerned with flood risk management and sewage infrastructure, but it is also important to ensure adequate green infrastructure is provided within new development. We note infrastructure constraints are going to be outlined in the proposed submission document. If you wish to consult us on this as it progress we will be happy to assist. We also note that the Water Cycle Study has not been included within your delivery framework (table 8) which will assist in delivering sustainable water infrastructure.

---

**Representer Number** 14 **Representation Number** 5423

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

The RSPB considers that monitoring of effects after development is not mitigation, merely monitoring, and thus cannot be used to conclude that there will not be an adverse effect on international sites. Monitoring of visitor numbers should be undertaken as part of the initial assessment process and used to provide a baseline from which the likely additional impact on visitor pressure to the Natura 2000 sites through the proposals outlined in the Plan can be assessed.

**Representor Number** 14 **Representation Number** 5427

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

CS2 Sustainable Development: Core Strategy Spatial Objective: Sustainable development targets are not just focussed on housing and regeneration. It also aims to "conserve and enhance the vitality of biodiversity, wildlife habitats and species and the Norfolk Coast Area of Outstanding Natural Beauty at Winterton-on-Sea." (We also recommend that this be extended to all designated sites/features in our comments on CS2).

---

**Representor Number** 14 **Representation Number** 5430

**Policy/Chapter/Paragraph** Delivery, Monitoring Framework

Internal Ref#

25

**Sub Section**

**Company/Organisation** Royal Society Protection of Birds

**Surname**

**Representing**

***Summary of Representation***

CS7 Gypsies and Travellers: Indicator: Monitoring of the status of designated sites and features is essential in ensuring that they are not adversely affected by the Policies. Monitoring must have accurate baseline data in order for accurate assessments of the effects of the Policies to be made.

**Representor Number** 4 **Representation Number** 5320

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

A further concern is over the preferred indicators and targets. Setting a target of 'maximise' seems difficult to either enforce or monitor. We suggested in an earlier response that more useful indicators would be areas of SSSI's, European sites, County Wildlife sites, BAP habitats, etc. This would give a more specific and attainable target, by which the success of the Core Strategy could be measured. More details is also required on the BAP habitat and species targets, which are also set to 'maximise'.

---

**Representor Number** 3 **Representation Number** 5311

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

Since our last response to you on the preferred options of the Core Strategy (dated 18 September 2006), the new Regional Economic Strategy has been published. Like its predecessor, the new RES identifies some specific aspirations for Great Yarmouth and Lowestoft. This includes the following; Exapansion of the higher and further education offer through the existing colleges with support from the University of East Anglia and University Campus Suffolk; Development of the EastPort outer harbout to provide modern port facilities and major employment opportunities; Improving the tourism offer and including development of a large casino and associated investment in high quality hotel, entertainment and leisure facilities; Delivery of major physical restructuring as set out in the 1st East area action plan.

**Representor Number** 57 **Representation Number** 5704

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Object to the removal of former draft Policy CS11 'Inclusive Development'. This encouraged the creation of safe, socially inclusive and adaptable environments for a range of occupiers and users with particular attention paid to providing housing employment and services that meet the needs of an ageing population, young people to allow them to stay in or move into the Borough, and people with special needs. This is an important part of securing socially inclusive communities and ought to be retained within the Core Strategy.

---

**Representor Number** 57 **Representation Number** 5703

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** De Pol Associates

**Surname**

**Representing** Northen Trust

***Summary of Representation***

Objection is raised to the deletion of former Policy CS4 'Environmental Protection' which required proposals to minimise adverse impacts on the environment and ensure the prudent use of natural resources. It also required development to avoid land liable to flood and encourage the remediation of contaminated land. These are matters which are supported in planning guidance and as such the policy ought to be retained.

**Represorator Number** 3 **Representation Number** 5315

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

In terms of the additional housing number, EEDA are keen to see that Strategic Objective 4 continues to apply and that the additional housing will make a significant contribution to the overall urban regeneration agenda in Great Yarmouth. We therefore welcome Core Policy CS1 - Spatial Strategy and Core Policy CS5 - Meeting the Housing Needs which will emphasise the balanced approach of new homes, jobs and cultural/leisure development that will be required in the town centre and waterfront of Great Yarmouth, in particular, supporting the 1st East Area Action Plan.

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**Represorator Number** 3 **Representation Number** 5316

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** East of England Development Agency

**Surname**

**Representing**

***Summary of Representation***

Finally, EEDA are pleased to see that the Core Strategy has taken a positive policy stance relative to renewable energy and in particular SO6 which seeks to encourage the exploitation and development of renewable energy sources. RES Goal 4 - Resource Efficiency, priority 2 seeks to ensure that the East of England continues to lead the UK in sustainable energy production. In addition, under the spatial economy goal of the RES the emerging opportunities in Great Yarmouth and Lowestoft for offshore renewable energy are identified building on the investments in Orbis Energy in Lowestoft.

**Representor Number** 4 **Representation Number** 5317

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

We welcome the Borough's robust approach to sustainable development and are pleased to note that many of our recommendations as English Nature have been incorporated into the amended document. We support the inclusion of the concept of 'enhancement' of the natural and built environment, and the need to 'manage' rather than 'protect' the Borough's vulnerable coastline.

---

**Representor Number** 4 **Representation Number** 5324

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

With the many protected landscapes and internationally designated wildlife interests that lie in the Borough of Great Yarmouth, and the accepted environmental pressures that these are under, we consider that the amended Core Strategy generally recognises and addresses many of these issues. However, our comments above highlight the need for further work, clarity and details in some areas of your CS.

---

**Representor Number** 4 **Representation Number** 5323

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

Landscape Character Assessment - we would encourage the local authority to seek opportunities to reinforce the distinctive character areas, rather than just being in sympathy with them.

**Representor Number** 4 **Representation Number** 5319

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

***Summary of Representation***

We welcome the assurance of protective policies and measures to ensure no adverse effect on European sites (Broadland Special Protection Area and Ramsar, and the Broads Special Area of Conservation) (Core Policy CS15 Natural Environment page 70). We note that an Appropriate Assessment for the Core Strategy is being prepared, as per our advice. The timing of this in relation to the production of the CS does give us some cause of concern, however. The purpose of the HRA (Appropriate Assessment) of the policies in the CS is not simply to assess their potential impact on international sites. Its role is to ensure that suitable policies are embedded in the CS to avoid or mitigate any harmful impacts, so that the lead competent authority (GYBC) can conclude that there would be no adverse effects on the integrity of international sites either within the Borough or outside.

---

**Representor Number** 61 **Representation Number** 5729

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Greater Yarmouth Tourist Authority

**Surname**

**Representing**

***Summary of Representation***

Concerns over the language used in this chapter; their disappointment over the treatment of Secondary Holiday Accommodation Areas; and omission of the concept of 'viability tests' for visitor accommodation seeking to opt out of tourism use.

**Representer Number** 61

**Representation Number** 5730

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Greater Yarmouth Tourist Authority

**Surname**

**Representing**

### *Summary of Representation*

The GYTA Board notes that quotes have been taken from the Tourism Strategy 2007-2010. However in your commentary in the Core Strategy (page 47-paragraph 2) you make reference to the 'borough's former years as a main tourist destination' and 'its falling status in the current market'. The Board would ask that such negative language about tourism and Great Yarmouth's status as a tourism destination are excluded from the Core Strategy. A suggested replacement sentence would be: "the strategy depicts its vision in response to the boroughs continuing success as one of England's most popular tourist destination and how it prepares to enhance and improve its national status in the market"

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**Representer Number** 4

**Representation Number** 5321

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Natural England

**Surname**

**Representing**

### *Summary of Representation*

Policies CS4, CS5 and CS6 should all contain reference to the incorporation of high quality, accessible, multi-functional green infrastructure into new developments

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**Representor Number** 34

**Representation Number** 5498

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Business Link East

**Surname**

**Representing**

***Summary of Representation***

The economic summary for the Borough (page 7), while it needs to be brief, should be more closely tied in to the well developed understanding of the sectoral strengths and priorities identified by the Council economic development department. For example: the offshore industry needs to be mentioned at this high level summary part of the document. This allows mention of marine, which is very active at present. The energy sector is also in need of a mention here and that allows the inclusion of a comment on environmental energy issues. This is important as, for example, wind energy is specifically mentioned in SO6.

---

**Representor Number** 38

**Representation Number** 5522

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Will all this work be lost if Boundary changes happen

---

**Representer Number** 43 **Representation Number** 5552

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** The Coal Authority

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

---

**Representer Number** 38 **Representation Number** 5519

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Winterton has a protected tern colony as well. AONB, SSSI, SAC. GYBC signed up to an AONB Management Plan

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**Representer Number** 37 **Representation Number** 5506

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Cleveland

**Representing**

***Summary of Representation***

I would like to see a change of policy in your planning at Burgh Castle. I have some land which would make ideal low cost housing on land that is very poor, well drained and not subject to flooding.

**Representer Number** 35

**Representation Number** 5504

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Castle

**Representing**

***Summary of Representation***

Where housing is less tall, it will tend to be 3-storey like much new housing in Southtown, Cobholm and Runham Vauxhall areas of Town.

In Gorleston there is no tradition of housing above 2 -storey and it would be appropriate to restrict 3 storeys and above to Riverside locations - so that garage/utility rooms only are at ground-level - with a general insistence on 2-storey developments for the rest of Gorleston.

---

**Representer Number** 35

**Representation Number** 5503

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Castle

**Representing**

***Summary of Representation***

The Southtown river frontage in particular should be of a good, distinctive architectural character bearing in mind the heritage South Quay opposite - we should aspire to something modern but perhaps reflecting the Dutch influence (as in Northgate Street area) - quite appropriate given the Dutch people's advanced thinking in terms of building in coastal areas.

**Representor Number** 38 **Representation Number** 5527

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Apart from housing, there is a lot of spare land to be found for different shops, business and leisure. With the reorganisation of Cobholm/Runham Vauxhall hitting problems, how will the LDF/AAP strategy work.

---

**Representor Number** 35 **Representation Number** 5501

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Castle

**Representing**

***Summary of Representation***

I strongly support the siting of the bulk of new housing in the coming period to 2021 in the urban town areas of Yarmouth and Gorleston, especially in the brown-field sites in Yarmouth - Central & South, Southtown, Cobholm and Runham Vauxhall. This will help revitalise and regenerate the town and will provide housing for people near to all manner of services, amenities - reducing the need to travel, and making for a more sustainable life-style.

---

**Representor Number** 38 **Representation Number** 5520

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Some policies contradict themselves.

**Representor Number** 33

**Representation Number** 5497

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Vaughan

**Representing**

***Summary of Representation***

Just a thought, I would love to build my own home but would want to choose the location, as the farmer if he would sell off an acre and not have to search nationwide just to find somewhere that ticks the boxes. But the developers seem capable of plonking tens of hundreds of houses just where they like.

---

**Representor Number** 33

**Representation Number** 5496

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Vaughan

**Representing**

***Summary of Representation***

It is my opinion that we should encourage private individuals to build their own property to help the housing shortage, for many reasons; This would release their existing house for sale; Individuals build better quality properties, more spaces etc; Of a more interesting design; Therefore leaving the county with a better architectural legacy for the future; and, Private individual builders source labour locally which ties in a community. Developers on the other hand: Build properties as cheap as they can get away with; Try to cram more properties in to a smaller land space again for cost reasons; Quality is not up to much as long as it qualifies for the 10 year gurantee and passess inspections; and, not too concerned with how the eventual people will live, cramped 10x11 master bedrooms etc.

**Representor Number** 33 **Representation Number** 5495

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Vaughan

**Representing**

***Summary of Representation***

There are 7240 houses needed to be built if the papers could be believed yet it is extremely difficult to find private building plots. Building plots as such hardly ever exist, obtaining permission from agricultural land is neigh on impossible.

---

**Representor Number** 32 **Representation Number** 5494

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Bradwell Parish Council

**Surname**

**Representing**

***Summary of Representation***

The Council has no comments to make regarding the amended document.

---

**Representor Number** 28 **Representation Number** 5490

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Geological Society for Norfolk

**Surname**

**Representing**

***Summary of Representation***

As part of the process of responding to these documents I have looked at my previous comments along with the officer's response; the Scoping Report of 2006; the Landscape Character Assessment of 2008; as well as the two documents currently being consulted on. I find the Core Strategy improved for geodiversity although with some sections still missing. However the Draft Sustainability Appraisal has no sustainability policies for geodiversity and so is inadequate.

**Representor Number** 24

**Representation Number** 5489

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Anglian Water

**Surname**

**Representing**

***Summary of Representation***

Please note that our company supports your document in principal and welcomes reference to the water cycle study and drainage systems (SUDS).

---

**Representor Number** 35

**Representation Number** 5502

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Castle

**Representing**

***Summary of Representation***

I believe that it would be helpful if the documents were to spell out the likely scale of buildings in the Yarmouth Riverside areas - buildings of up to 5 storeys will in that location be in keeping with the existing port/industrial buildings - and the additional height will be necessary to give the costings for construction to take into account difficult ground conditions and flood amelioration measures. It will however be important to enshrine public access along the sides of the Rivers Yare and Bure as envisaged in the URC masterplan and Borough Council "Charter Walks" concepts.

**Representor Number** 48 **Representation Number** 5601

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Morris

**Representing**

***Summary of Representation***

No comment

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**Representor Number** 11 **Representation Number** 5349

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Ward

**Representing**

***Summary of Representation***

I have looked carefully through the document to find any mention of swimming facilities. With the provision of free passess to the over 60s and under 16s, there should be some expression of a determination to increase the facilities available to the general public.

---

**Representor Number** 12 **Representation Number** 5350

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Highways Agency

**Surname**

**Representing**

***Summary of Representation***

The location of development should be based on suitable evidence to support delivery. To date the Highways Agency has not seen any transport evidence and is therefore not in a position to provide a formal view. However, it is working in partnership with Great Yarmouth Borough Council and Norfolk County Council and is confident that in due course an understanding of the transport implications will be available.

**Representer Number** 12

**Representation Number** 5351

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Highways Agency

**Surname**

**Representing**

***Summary of Representation***

In general terms, the Highways Agency accepts the physical constraints limits the location of future development and some increased congestion may be inevitable. The location of development should be such that impact on the need to travel particularly by car is minimised. There should be some acknowledgement of the hierarchy of the transport infrastructure, and transport corridors where necessary should be protected. This applies particularly to the A12 where the highest transport priority/function is to provide access to the ports of Great Yarmouth and Lowestoft.

---

**Representer Number** 52

**Representation Number** 5663

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Given the emphasis within the Core Strategy on regenerating previously developed land, and given the industrial nature of much of this land, we feel that reference needs to be made to water quality with respect to contaminated sites and pollution control. Much of your Borough is situated on a major aquifer and has a shallow depth to groundwater. This means there can be a short pathway from source to receptor which can be an initial constraint to both SuDS and remediation of contaminated sites. We would suggest it is incorporated into existing policies and developed further within the Development Control DPD. Wording such as 'Developments will only be permitted where there is no unacceptable risk to surface and ground water quality' would be sufficient.

**Representor Number** 52

**Representation Number** 5664

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Environment Agency

**Surname**

**Representing**

***Summary of Representation***

Further to this you should be mindful that the sewage from Great Yarmouth and Gorleston is discharged to the sea. Currently the six bathing waters along your coastline have good compliance with current Bathing Waters Directive and are likely to have a good compliance under the revised Directive. You will need to be sure that the planned growth will not impact upon this status.

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**Representor Number** 53

**Representation Number** 5666

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Somerton Parish Council

**Surname**

**Representing**

***Summary of Representation***

We would suggest that where references to the Norfolk Coast Area of Outstanding Natural Beauty" at Winterton-on-Sea are mentioned, that Somerton be included, since part of this parish is within the AONB area.

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**Representor Number** 45

**Representation Number** 5581

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Norfolk County Council

**Surname**

**Representing**

***Summary of Representation***

The Core Strategy raises a number of issues, which are set out in the above report. The general vision statement and the sustainable objectives set out in the document are welcomed as is the broad level of housing proposed.

The Core Strategy needs to provide more clarity in relation to the provision of infrastructure and services made necessary by the planned growth; and there are a number of detailed recommendations, and comments regarding policies contained within the Core Strategy.

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**Representor Number** 49

**Representation Number** 5602

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation**

**Surname** Mumford

**Representing**

***Summary of Representation***

Lack of consideration of those who live and work in the rural economy.

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**Representer Number** 9 **Representation Number** 5345

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Government Office for East of England

**Surname**

**Representing**

***Summary of Representation***

We are pleased to see the ongoing development that is being made on this DPD and are supportive of the approach your authority has taken with this consultation.

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**Representer Number** 38 **Representation Number** 5521

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Winterton is listed as small scale development but no maximum development figures are quoted for the area.

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**Representer Number** 38 **Representation Number** 5526

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Interested to see what the 2-5% would look like (increase in development) however, they havent followed rules on ensuring it is followed as we saw in the Empsons incident - as soon as a large company gets involved the controls seem to be ingored until its too late.

**Representor Number** 38 **Representation Number** 5524

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

Does not include final decisions on any proposed development for us i.e. further building at Downings Farm but we should not face significant development.

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**Representor Number** 38 **Representation Number** 5523

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

New development control policies development plan document - will the borough councillors adhere to this. Seems decisions will be made will nilly.

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**Representor Number** 41 **Representation Number** 5535

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Broads Internal Drainage Board

**Surname**

**Representing** TMM Caravans

***Summary of Representation***

On a more general note, what otherwise seems to be a well-structured, comprehensive document is let down by a huge number of spelling and grammatical mistakes.

**Representor Number** 38

**Representation Number** 5528

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Winterton Parish Council

**Surname**

**Representing**

***Summary of Representation***

No mention of light pollution that will be caused by the number of developments that will be provided.

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**Representor Number** 53

**Representation Number** 5665

**Policy/Chapter/Paragraph** General Comments

Internal Ref#

26

**Sub Section**

**Company/Organisation** Somerton Parish Council

**Surname**

**Representing**

***Summary of Representation***

The Amendment to the Core Strategy document together with the Amendment to the Core Strategy Sustainability Appraisal document are comprehensive and well prepared.

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