



# **Conversion & Re-use of Rural Buildings as Dwellings Draft Policy**

Responses to Public Consultation

2 October – 13 November 2009

**North Norfolk District Council  
Planning Policy Team**

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# Conversion & Re-use of Rural Buildings as Dwellings Draft Policy

## Report of Representations

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The Conversion & Re-use of Rural Buildings as Dwellings Draft Policy was published for 6 weeks public consultation from 2 October to 13 November 2009. A total of 82 representations were received during this period from 64 individual consultees. This document is a complete report of all the representations received and duly made.

The tables in this document display the content of each representation, showing the representation number and the name of the person or organisation making the comment. It shows the nature of their representation (support, comment or object) and details of why they feel the document is or is not legally compliant, sound, and the amendment sought to the document.

The column stating the comment type; 'support, object or comment' was not requested as part of the consultation, but is an officer's interpretation of the representation. An indication of soundness and legal compliance was requested from consultees which is also shown in the following tables.

Where text states "OFFICERS SUMMARY - SEE ATTACHED FILE" (or similar) please refer to the LDF Consultation Portal at: [http://consult.north-norfolk.gov.uk/portal/planning/ssp/site\\_specific\\_proposals\\_draft\\_plan](http://consult.north-norfolk.gov.uk/portal/planning/ssp/site_specific_proposals_draft_plan)

- If viewing an electronic version of this document, just click on the relevant link marked **SEE ATTACHED FILE** and you will be automatically directed to the document.
- If viewing a hard copy version of this document visit the web address above and opt to 'read document and view comments'. Select the appropriate section from the left-hand menu and browse to locate the attachment you require.

The Council will prepare a summary of the main issues raised through the representations. This report will be sent to the Secretary of State, along with a copy of all representations made, when the Draft Policy is submitted for Examination. For further information on the Local Development Framework please visit our website at [www.northnorfolk.org/ldf](http://www.northnorfolk.org/ldf)

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# Conversion & Re-use of Rural Buildings as Dwellings Draft Policy - Report of Representations

Document Reference Point	Comment ID Name / Organisation	Comment Type, Sound? Legal Compliant?	Reasons for Sound/Unsound	Changes Necessary for Legal Compliance / Soundness
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP1, Mr Philip Hirst, British Pipelines Agency	Comment, Not Specified, Not Specified	BPA request that the rights of statutory operator consultation on all planning matters are maintained within our pipeline Area of Interest or easement.	
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP24, Miss Rachael Bust, Coal Authority	Comment, Not Specified, Not Specified	Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP25, Mr. C. Marsden, Lanpro Services	Object, Not Specified, No	<p>The Policy is unsound for the following reasons:</p> <ul style="list-style-type: none"> <li>Paragraph 1.2.3 states that the policy will apply broadly within a 1km radius around 44 specified settlements. Paragraph 2.2 states that the policy will only apply to buildings of historic, architectural or landscape value. It should therefore be possible for the Council to identify precisely which buildings would be considered suitable for conversion under the terms of this policy. Moreover it would appear that the Council has already identified such buildings in view of the fact that they have been classed as, "...worthy of retention, often vacant or underutilised...'</li> <li>The specified locational criteria appears irrelevant in the context of the way in which the policy is drafted. Paragraph 2.2 states that the policy will only apply to buildings of historic, architectural or landscape value, and will only apply within a 1 km radius of 44 selected settlements. However, Policy HO9 states that outside the identified locations, residential conversion will only be permitted where the building is of historic, architectural or landscape value. As no distinction is drawn it is suggested that the policy be applied to all buildings within the district, irrespective of location, where the criteria of historic, architectural or landscape value, is established. Alternatively, if this is intended to refer only to listed buildings, then the policy should be unequivocal on that count.</li> <li>Policy HO9 refers to proposals for conversion that would result in the loss of a significant number of jobs will not be supported. Paragraph 2.2 however states that most of these properties are often vacant or underutilised and that residential conversion may offer a sustainable future.</li> </ul>	The Policy should reflect that contained in PPS7 No justification has been put forward why a different approach is necessary.

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			<p>Residential use rather than business use is likely to be more sustainable given that commercial uses tend to generate more vehicle trip movements to and from the site.</p> <ul style="list-style-type: none"> <li>• The requirement for affordable housing provision to be considered in the context of this policy is unreasonable and unacceptable given the contents of paragraph 2.6 where it is anticipated that schemes likely to come forward under the policy will consist of individual and small groups of dwellings. It is suggested that the Council needs to decide whether Policy HO9 is intended to control the extent of residential conversions in the countryside or whether it is being used to extort additional affordable housing provision from schemes which are likely to be of marginal viability.</li> <li>• The definition of "...suitably constructed buildings..." requires clarification.</li> <li>• The definition of "...an appropriate scale..." requires clarification. The content of paragraph 2.6 appears arbitrary as presently defined.</li> <li>• The content of paragraph 2.7 contradicts what is required in paragraph 2.3 in respect of the conversion of listed buildings. In addition, as the Council has acknowledged that "...residential conversion may offer a sustainable future..." (para. 2.2) it is difficult to reconcile why it should be necessary to justify the conversion where the previous use is no longer required or viable.</li> <li>• The policy is contrary to the provisions of PPS7 on the conversion of rural buildings, to which no regard is had in its drafting. This is a serious omission and justification as to why North Norfolk is a special case to depart from that policy approach is necessary.</li> </ul>	
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP26, Miss Jo Hardwick, Environment Agency	Comment, Not Specified, Not Specified	Thank you for consulting the Environment Agency. We have reviewed the consultation documents and have no specific comments to make further to those provided in our response to the issues and options consultation. We reiterate that this policy must be considered alongside other policies in your adopted Core Strategy and Development Control Policies DPD, including policy EN9 and EN10.	n/a
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as	DP27, Ms Louise Oliver, Natural England	Comment, Yes, Yes	<a href="#">(SEE ATTACHED FILE)</a> Thank you for consulting Natural England about the above consultation. We have no specific comments to make other than we consider both the Appropriate Assessment and Sustainability	

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Dwellings Draft Policy			Appraisal to be satisfactory.	
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP35, Mr Chris Allhusen, C.L.A.	Object, Yes, No	I write as Chairman of the Norfolk Branch of The Country Land & Business Association. Our members in North Norfolk own around two thirds of the rural land mass of the District Councils' area. They are significant contributors to the revenue of the District Council and feel strongly that this proposed planning Policy is discriminatory and not in line with the rest of Rural Planning Policy in the following areas. 1) Restricting this policy to small areas around small conurbations, we feel does not comply with the National Planning Policy PPS 7, which allows all redundant rural buildings to be considered for Domestic use and not restricted areas only. 2) The proposed Policy is considered as a post code lottery. This is unjust and unreasonable. 3) We believe that NNDC should now take the opportunity to harmonise its planning policy with the rest of Norfolk County. Going forward we can see no reason to maintain a different policy for North Norfolk, and therefore a coherent policy should be adopted by the Council. 4) The proposed policy is discriminatory, dependant upon where the plans are required. This policy is not conducive to maintaining a living countryside and detrimental to the revenue of the Council. The use of a European measurement, 1 Km, only goes to emphasise an inconsistent line of thinking through of this policy for the long term.	We therefore seek a consistent line of thinking and harmonisation for North Norfolk, with other planning guidance notes in Norfolk and the National Planning policies.
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP39, Mrs Clare McNamara	Object, Not Specified, No	It is not justified as having gone through the whole consultation process; the majority of comments seem to be ignored. For instance: Q7 Do you agree that certain buildings of historic, architectural or landscape value, irrespective of location should be allowed to be converted to residential use, where that use would best secure the future of that building? 93% of the over 130 respondents answered yes Q12 At this stage Council considers Option 3 is the preferred option - do you agree? 70% answered no, 30% yes and 117 responded to this yes/no question And looking at the rest of the questionnaire, it would surely have been more logical to go for Option 5 or a form of Option 5 as the basis for the draft policy. And with regard to effectiveness, looking at the aims of the policy ie 1 to help support the sustainability of rural communities and services 2 to secure the future of traditional rural buildings that positively contribute to the local distinctiveness of North Norfolk Why is this restricted to 44 settlements? Surely these aims apply to the whole of the North Norfolk area. It could be argued that the	Option 5 should be used as the basis for the draft document as it is a flexible option and reflects the views of the majority of interested parties. Buildings of historic, architectural or landscape interest across the district Would allow the conversion of buildings of historic, architectural or landscape interest anywhere in the district provided the proposal would not be detrimental to the character or special interest of the building or setting. In addition, I would like to see the requirement for high quality conversion schemes to be included in the policy as it is vital to achieve the stated aims i.e. as per 2.4 in the existing draft In all cases conversion schemes would be expected to be of the very highest quality and ensure that the qualities of the building and its setting are maintained. With regard to the need for a contribution to affordable

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			<p>smaller villages need more help in the context of future sustainability than the larger ones. Communities are sustained by people living in them. This appears to be a very inflexible approach. Often repeated in the documentation is the fact that sympathetic re-use of suitable buildings can contribute to the achievement of sustainability objectives by reducing the need for new building in the countryside and by supporting rural economies and communities. Conversion of existing buildings is an efficient use of land (from the Sustainability Appraisal). If the buildings are already there, it makes sense to use them. There is a lot of discussion in the documentation about the importance of converting rural buildings to a high standard which must be essential and is a big improvement on the earlier option. However, this is not included in the draft Policy HO9. It should be noted that a well converted rural building is not a cheap option, hence most buildings would not be suitable as affordable homes. The requirement for any more than one conversion to subsidise affordable homes at the rate of one for every two conversions (currently estimated as of today 09/11/2009 from Tracy Armitage, Senior Planner, NNDC at £80,000 per home) will substantially increase the cost of barn conversions. So for a homestead of five barns, which is fairly average, the contribution to the council for affordable homes would be two and a half times the number of barns i.e. £200,000 which is unrealistic in any financial climate, let alone the current one. It is also disappointing that a truly sustainable package seems not to have been considered as a planning requirement. This is likely to be more viable with groups of barns outside villages.</p>	<p>housing, I would like additionally to see inserted: an amount to be agreed bearing in mind the current market conditions. In the context of a truly sustainable package, I would like to see added Permission will be favourably considered when it can be shown that sustainable systems such as windmills, reedbeds, solar panels, heat recovery systems, biodiscs, etc, have been researched and can be used on the property.</p>
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP44, Mr Alex Dinsdale, National Farmers' Union	Comment, Not Specified, Not Specified	Thank you for giving the National Farmers' Union the opportunity to comment on this consultation. Having reviewed your document, I confirm that we have no specific comments to make on the document at this stage.	
Core Strategy Single Policy Review: Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP56, Ms Mary Marston, Government Office East of England	Comment, Not Specified, Not Specified	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>1. Thank you for consulting the Government Office on the North Norfolk Core Strategy Single Policy Review. We welcome the progress you have made with your review and are pleased to note that your Development Plan Document (DPD) is accompanied by a suite of supporting documents.</p> <p>2. You will be aware that, in relation to Local Development</p>	

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			<p>Frameworks, the role of the Government Office is first and foremost to support the timely delivery of Core Strategies. As one of the first authorities to adopt a Core Strategy - and with a Site Allocation DPD approaching submission - North Norfolk has a strong performance record in bringing forward DPDs. The current consultation relates to policy for the conversion and re-use of rural buildings as dwellings. It responds to issues identified in the Inspector's Report of your Core Strategy, and we support the approach you have taken in bringing forward this review. We do not intend to comment on the draft policy content.</p> <p>3. I note that you are proposing to submit your revision document along with your site allocation DPD in April 2010. If there are any specific matters on which I may be of assistance prior to submission, please do not hesitate to contact me.</p>	
Paragraph 1.1.3	DP80, Mrs Elizabeth Purdy	Comment, Not Specified, Not Specified	<p><a href="#">(SEE ATTACHED FILE)</a> Easier to install self-sustainable ecotech systems of heat, power and sewage in an isolated farm setting.</p>	
Paragraph 1.1.4	DP40, Mr Roger Stanton	Object, Yes, No	<p>The criteria used in determining the locations for the designated policy areas is not consistent with other measurement criteria used affecting properties within the North Norfolk area. In particular: Why is the measurement in Km rather than miles being our standard measurement criteria? When considering the provision of transport to school only pupils between the ages of 8 and 16 living more than 3 miles from school measured by the nearest available walking route qualify for free transport. Pupils under 8 are expected to walk up to 2 miles. The same measurement of 3 miles from the local school should be used in drawing up the designated policy area. The policy is also unsound as it restricts the number of properties available for purchase and occupancy by local people at a time when there is pressure to provide more housing within the area. By restricting residential occupancy of existing buildings being converted and allowing commercial use, i.e. holiday, lets local shops and businesses suffer. A property occupied throughout the year by a local family generates more income for the local economy than a property only partly occupied by visitors who will often shop in their local shops and bring groceries etc with them rather than shop in the local village. It is the stated aim to keep the local schools open and therefore residential use of buildings already in existence should be encouraged rather than be outlawed.</p>	<p>My main area of criticism relates to the definition of the proposed designated policy areas and I would propose an amendment as follows: The designated areas be 3 miles from the edge of the qualifying villages/towns.</p>

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			Another reason given for refusing conversion for residential use is to prevent the overloading of the local Health service. This is inconsistent with the general government requirement to provide additional housing within North Norfolk. Removing existing restrictions on properties already converted would increase the housing stock within the area by some 700. A less restrictive policy would also encourage more unsightly and run down units to be converted thus creating employment in the depressed construction industry.	
2 Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP23, Ms Mary Cubitt,	Comment, Not Specified, Not Specified	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION. Present farming practices require secure purpose built barns and structures resulting in an excess of deteriorating buildings that require expensive renovation/maintenance. Small farms can not support the upkeep of these redundant buildings unless they are sold off for residential or long-term rental use. Present policy of allowing short let holiday use is not viable for small farms given the capital outlay. Farms are not tourist executives and would rather sell unwanted buildings. The capital would ensure a viable farm improvement and a community benefit in the area. Permanent residents will use village local facilities and businesses for more than 3months a year as the present bias towards tourism has had a detrimental effect on our villages. Permanent housing is needed and some of the larger barns could be converted into smaller units for cheaper purchase or rental options. Present policy impossible to enforce as many barns are already in residential use and long-term rental.	Not specified.
2 Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP28, Mr & Mrs Ronald & Constance Compton,	Support, Yes, Yes	We support the soundness of the draft policy document to help secure the future of traditional rural barns which stand empty and are no longer required for their original use and which can be converted and re-used as permanent dwellings to help meet the much needed provision of new housing without the need as such of erecting new buildings but supporting the local rural economy and community. We make this representation as owners of long family held rural buildings on the outskirts of a proposed designated village where several conversions have been permitted within the village envelope.	
2 Conversion & Re-use of Rural Buildings as Dwellings Draft Policy	DP38, Mrs Joanna Otte, Stody Parish Council	Support, Yes, Yes	Stody Parish Council supports this policy.	No changes proposed.

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Paragraph 2.1	DP2, Ms Nichola Harrison	Support, Yes, Yes	I strongly support the principle set out in Para 2.1 that converted rural buildings can play an important role in securing a sustainable future for rural services and for smaller settlements, especially those designated as Countryside by the Core Strategy where residential development is otherwise severely restricted.	
Paragraph 2.1	DP81, Mrs Elizabeth Purdy	Comment, Not Specified, Not Specified	Sustaining rural communities...and securing the future of traditional rural buildings that positively contribute to the local distinctiveness of North Norfolk. What does the Council suggest as a financially viable alternative for the preservation of redundant farm buildings, particularly those within the curtilage of listed farmhouses, which because of the nature of agriculture are likely to be in small villages or rural settings? The Council has already made exceptions to this rule by considering the building of affordable housing on Council-owned land in small villages, e.g. Paston.	
Paragraph 2.2	DP4, Mr Daniel Corbett	Object, Yes, Not Specified	Lack of clarity.	Third sentence onwards should be re-written as follows: "These buildings are worthy of retention, such buildings as these are often vacant or under utilised and residential conversion may offer a sustainable future. It is envisaged that the policy would not normally apply to the sub-division of existing residential properties, or outbuildings providing an ancillary domestic function, nor any purpose built holiday accommodation."
Paragraph 2.2	DP18, Mrs Sue Willis,	Object, Yes, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Lack of clarity.	<a href="#">(SEE ATTACHED FILE)</a> Third sentence onwards should be re-written as follows: "These buildings are worthy of retention, such buildings as these are often vacant or under utilised and residential conversion may offer a sustainable future. It is envisaged that the policy would not normally apply to the sub-division of existing residential properties, or outbuildings providing an ancillary domestic function, nor any purpose built holiday accommodation."
Paragraph 2.2	DP22, Mr Hugh Ivins, Planning Consultant	Object, Yes, No	The policy should also apply to the removal of holiday occupancy conditions of previously converted barns as confirmed by the Planning Officers report to the LDF Working Party of 20 July 09,	Insert the full text of that paragraph as an additional paragraph after 2.2, as follows;- "Buildings that have been previously converted

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			(page 12 second from bottom paragraph). This was agreed by the Cabinet on 7 Sept 09 and Full Council on 23 September 09 without any changes.	and are subject to holiday occupancy conditions will continue to be subject to these conditions. However, where they lie within the area defined by the new policy, where full residential use would be permitted, then an application for removal of those conditions would likely be permitted providing the building meets the building type criteria and where applicable the requirements of EC8."
Paragraph 2.2	DP46, Mr Mike Terry	Object, Yes, No	The policy is primarily aimed at rural buildings of quality "buildings of historic architectural or landscape value" and in the case of North Norfolk these will mainly be former agricultural barns. However the policy is not exclusive to former agricultural buildings. For this reason it is not at all clear why the statement is made in paragraph 2.2 of the policy justification that the policy will not normally apply to the subdivision of existing residential properties. PPS 3 explicitly recognises the contribution that can be made from bringing into use the existing housing stock: "Making effective use of existing housing stock 31: Conversions of existing housing can provide an important source of new housing. Local Planning Authorities should develop positive policies to identify and bring into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase procedures". It would appear to be inconsistent to allow the residential conversion of a barn within the specified policy area and at the same time not to allow the subdivision of a large say 6 bedroom house immediately adjoining the barn into a number of flats. Elsewhere the core strategy Policy HO1 on dwelling type and mix, seeks the incorporation of small units within large scale developments in line with the findings of the housing market assessment. It would seem appropriate for a policy on the re-use of rural buildings to include the subdivision of existing dwellings, provided the other criteria of the policy are met. Clearly the intensification of development by subdivision has other implications such as the potential for noise disturbance, the residential amenity of nearby occupiers, and potentially the provision of parking but these are all matters covered by the other development control policies. Whilst the reason for the exclusion of "outbuildings providing an ancillary function" is not made explicit it is understandable given that many of these can be erected without the specific	The wording in paragraph 2.2 could be changed to read: "It is envisaged that the policy would apply to the subdivision of existing residential properties but not to outbuildings providing an ancillary domestic function or purpose built holiday accommodation". This will be consistent with PPS3, HO1 and encourage the re-use of existing residential buildings.

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			permission of the Local Planning Authority under the provisions of the General Permitted Development Order. As a consequence there could be a proliferation of curtilage buildings available for conversion to housing but acting against the general thrust of the approved spatial strategy.	
Paragraph 2.3	DP82, Mrs Elizabeth Purdy	Comment, Not Specified, Not Specified	Listed Buildings - residential conversion MAY be allowed irrespective of location, provided such a use was demonstrated to be the optimum to secure the future of the building. Clarification of the meaning of 'listed by association' needs to be defined in the policy.	
Paragraph 2.4	DP5, Mr Daniel Corbett	Object, Yes, No	The statement needs to be stronger.	Re-write as follows: "In all cases conversion schemes would be expected to be of the very highest quality and thus ensure that the qualities of the building and its setting are maintained. The North Norfolk Guide provides detailed advice on the conversion of agricultural and historic buildings. Planning permission granted for conversions should have a condition attached removing any permitted development rights for which the building would qualify under the Town and Country Planning (General Permitted Development) Order 1995, as amended, following its change of use. There may be specific occasions when it may be deemed appropriate not to attach such a condition, but it is considered that such occasions will seldom occur.
Paragraph 2.4	DP19, Mrs Sue Willis	Object, Yes, No	<a href="#">(SEE ATTACHED FILE)</a> The statement needs to be stronger.	<a href="#">(SEE ATTACHED FILE)</a> Re-write as follows: "In all cases conversion schemes would be expected to be of the very highest quality and thus ensure that the qualities of the building and its setting are maintained. The North Norfolk Guide provides detailed advice on the conversion of agricultural and historic buildings. Planning permission granted for conversions should have a condition attached removing any permitted development rights for which the building would qualify under the Town and Country Planning (General Permitted Development) Order 1995, as amended,

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				following its change of use. There may be specific occasions when it may be deemed appropriate not to attach such a condition, but it is considered that such occasions will seldom occur.
Paragraph 2.5	DP83, Mrs Elizabeth Purdy	Object, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Delivery of affordable housing in the District by financial or other contribution. This cannot be so huge as to make the conversion unprofitable, or developers will not be able to borrow finance. 50% or equivalent is too much, and thus the Council would not benefit at all. The Council should also be aware of the Council Tax benefits from barn conversions. Could also help to free up village cottages for locals.	
Paragraph 2.7	DP6, Mr Daniel Corbett	Object, Yes, No	Insufficiently precise.	At end of Final sentence, replace "not normally be supported" with "seldom be permitted".
Paragraph 2.7	DP20, Mrs Sue Willis	Object, Yes, No	<a href="#">(SEE ATTACHED FILE)</a> Insufficiently precise.	<a href="#">(SEE ATTACHED FILE)</a> At end of final sentence, replace "not normally be supported" with "seldom be permitted".
Paragraph 2.7	DP84, Mrs Elizabeth Purdy	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> The objective of creating and maintaining sustainable rural communities will be the primary consideration - The population in small villages has DECLINED. A few more higher-income residents would help redress the plight of rural deprivation by their involvement in village life. Also employ local tradesmen and provide jobs such as gardening, cleaning, tending animals, etc. Help organise village events. Support local market towns which are undergoing regeneration schemes such as Cromer, North Walsham. Holidaymakers do not. Also no difference in car use between holiday/second home owners and residents.	
Policy HO9	DP3, Ms Nichola Harrison	Object, Yes, No	I have two reservations about the policy's justification and effectiveness - one substantial and one a technicality: 1. The inspector who examined the Core Strategy advised that "the policy should meet 'the needs of all communities including the rural ones'. In my view it is debatable whether the council's proposal to apply the policy to only 44 settlements (i.e. only 20 settlements over and above the designated settlements in Policy SS1) meets this requirement: it leaves, as I understand it, as many as 80 villages outside of the policy. 2. I support the	1. In relation to my first reservation, I believe the policy would be more effective and better justified had Stage 3 of the council's selection methodology required settlements to provide two, rather than three, of the specified facilities/services, so that more than 44 villages would be included in the policy. 2. The policy and/or supporting text and/or key to the Proposals Map should set out that the policy will

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			council's view that 1 kilometre from the settlement boundary is the right distance for application of the policy, since this is a reasonable distance for walking and cycling. However, neither the policy nor the supporting text is clear in specifying and explaining this criterion - the only reference I can see is in the Background and Methodology document. I support all other aspects of the proposed policy.	apply to buildings located 1 kilometre or less from the boundary of each included settlement, and should explain why this distance has been chosen.
Policy HO9	DP7, Mr Daniel Corbett	Object, Yes, No	Insufficiently explicit.	Add a further sentence to Footnote 1 as follows: "Where necessary the appropriate financial contribution for each proposal should be resolved by strict adherence to a consistent set of formalised, written, questions."
Policy HO9	DP10, Mr David Ramsbotham	Object, Yes, No	The document is unsound because, although the local community and others having a stake in the area participated in the consultation process, the views of the majority [who had an opinion on this aspect], that a policy similar to HO9 should apply to all of the North Norfolk area, have been ignored.	Tests 1 to 5 should apply to the whole area and the rest of policy HO9 should be deleted. This would ensure that the stated aims of the policy "To help secure the future of traditional rural buildings that positively contribute to the local distinctiveness of North Norfolk" and "To help support the sustainability of rural communities and services" were achieved throughout the whole area and would make the document sound. The policy would also then be comprehensible to all concerned and would save money by eliminating unnecessary involvement of Officers and Members of the Council on many planning applications.
Policy HO9	DP11, Mr G Dann, Broads Internal Drainage Board	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Further to your consultation regarding the above, I am writing on behalf of Norfolk Rivers IDB and Broads (2006) IDB, which are the two WMA Boards within your Council's area. Although the Boards may have comments for consideration at the time when individual applications are submitted for re-use of an existing building as a dwelling, I do not have any comments to make regarding your present consultation on the criteria such buildings should meet to be considered suitable for residential conversion.	Not Specified
Policy HO9	DP12, Mr G Dann, Norfolk Rivers Internal Drainage Board	Comment, Not Specified, Not	<a href="#">(SEE ATTACHED FILE)</a> Further to your consultation regarding the above, I am writing on behalf of Norfolk Rivers IDB and Broads (2006) IDB, which are the two WMA Boards within your Council's area. Although the	Not Specified

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		Specified	Boards may have comments for consideration at the time when individual applications are submitted for re-use of an existing building as a dwelling, I do not have any comments to make regarding your present consultation on the criteria such buildings should meet to be considered suitable for residential conversion.	
Policy HO9	DP13, Mr Anthony Faulkner	Object, Yes, No	The Draft Policy is too restrictive in only allowing conversion of buildings within a 1km radius of certain selected settlements. The preamble to the policy recognises the historic and landscape importance of many rural buildings in the District, but this importance is not restricted to the areas selected. It applies to the whole rural area. If, as stated, one of the policy aims is "to secure the future of traditional rural buildings that positively contribute to the local distinctiveness of North Norfolk" (Aim 2) it should apply to the whole rural area equally. The preamble also recognises the contribution that the conversion of suitable rural buildings can make to the sustainability of villages in their area. This contribution, however, applies equally to the smaller villages and hamlets, indeed it could be said to be proportionally more important in these locations where the effect on the settlements would be greatest.	To be 'sound' the Policy should be directed to achieving the two Aims for the whole rural area, and not just the restricted areas depicted on Map 1. This can be achieved by omitting item 1 of the Draft Policy while retaining items 2 to 5.
Policy HO9	DP15, Mrs Catherine Lewis, The Thatching Information Service	Object, Yes, No	What I wish to reiterate is the need for agricultural buildings to remain affordable for small businesses. If the majority of buildings are converted to residential, their value will increase beyond the means of most rural enterprises and would become lost assets. Provision must be made for some degree of small business enterprises to be able to buy or rent rural properties so as to ensure that the rural economy is not top heavy with residential needs.	Amend the policy to allow for commercial / light industrial / rural business accommodation to be included in developments where appropriate.
Policy HO9	DP16, Mrs Catherine Lewis, The Thatching Information Service	Object, Yes, No	I also want to have clarified the issue of conversion and what constitutes the degree of re-construction that will be required if buildings are to comply with modern building regulations. It is my belief that the majority of such buildings will require a great deal of work if they are to be brought up to modern building standards and therefore this matter needs urgent attention by those in authority who understand the dilemma between converting older properties so as to ensure their character survives whilst at the same time the need to sometimes demolish them and reconstruct in order to comply with regulations. This dilemma is encountered every day all over the country and without a clear, unambiguous, straight forward policy which has been given	Clarify the word 'substantial' when it talks about converting existing buildings and precisely what this means as to the amount and degree of building work permissible to comply with the what the council accepts as 'conversion' of a building.

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			critical consideration by those who understand the complexities of this subject, there can be little hope of a sensible way forward. If the Council insists that only buildings that do not require substantial reconstruction can be converted, it must make clear as to how the building can achieve the necessary building regulations that will be applied to it by Building Control.	
Policy HO9	DP17, Ms Helen De La Rue, EERA	Comment, Yes, Yes	<a href="#">(SEE ATTACHED FILE)</a> Draft Policy HO9 is in general conformity with the East of England Plan.	
Policy HO9	DP21, Mrs Sue Willis	Object, Yes, No	<a href="#">(SEE ATTACHED FILE)</a> Insufficiently explicit.	<a href="#">(SEE ATTACHED FILE)</a> Add a further sentence to Footnote 1 as follows: "Where necessary the appropriate financial contribution for each proposal should be resolved by strict adherence to a consistent set of formalised, written, questions."
Policy HO9	DP29, Mr Ian Shepherd, CPRE	Object, Yes, No	CPRE Norfolk consider policy HO 9 to be sound in all respects, with we suggest one specific reservation on effectiveness. This relates to buildings of exceptional historic, architectural or landscape value. We strongly support the principle of securing the long term future of redundant buildings in this category. At the same time there is a need for the highest standards in the design for adaptation and in the restoration work, such that the intrinsic character of the building and the setting is fully respected. There is a potential for this to be compromised in seeking to achieve criterion 5 of the policy.	We would propose a modification to the sentence following point 5, in the third (last line), so that the final words read .....and the above criteria 3 and 4 are met, and criteria 5 in so far as the intrinsic character of the building and its setting is fully respected, and this forms part of the viability test.
Policy HO9	DP30, Ms Julie Chance, Trimingham Parish Council	Support, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> I am writing to confirm that Trimingham Parish Council supports the proposals put forward by North Norfolk District Council in the above matter.	
Policy HO9	DP31, Ms Elaine Pugh, Gimingham Parish Council	Object, Not Specified, Not Specified	OFICERS SUMMARY- <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION Policy HO9 is far too complex to administer and NNDC should allow all or nothing. It is imperative that any building should not be left to decay and erode in the countryside; all buildings should be utilised wherever possible and financially feasible to do so.	OFICERS SUMMARY- <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION The Policy of HO9 is unacceptable and we would refer you to the original option 5 criteria and suggest this is the correct policy: "Would allow the conversion of buildings of historic, architectural or landscape interest anywhere in the district provided the proposal would not be detrimental to the character or special interest of

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				the building or setting". The Parish Council feels strongly that these buildings must be used to build communities and utilised as homes.
Policy HO9	DP32, Natalie Blaken, EEDA	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Thank you for consulting EEDA on the proposed draft policy for the Conversion and Re-use of Rural Buildings as Dwellings, as part of your Core Strategy Single Policy Review for North Norfolk District Council. EEDA has no comments to make on this document.	
Policy HO9	DP33, Mr Richard Jelliff	Support, Yes, Yes	I would support the legal compliance and soundness of the document without hesitation as in my view the conversion of rural buildings into permanent residential units is a priority and an opportunity not only to provide much needed accommodation to preserve the life-blood of our villages, but also to ensure that these lovely unique buildings are saved for future generations.	
Policy HO9	DP34, Mrs Gillian Jelliff	Support, Yes, Yes	We need to preserve these buildings; they must not be allowed to fall into disrepair. The present policy really does not make sense in that it is not cost effective. Under the new proposals for permanent residential use not only would it be cost effective, but also much better for the community as a whole. I therefore support this proposal wholeheartedly.	
Policy HO9	DP36, Ms Katharine Fletcher, English Heritage	Object, Not Specified, Not Specified	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION The Policy is divided into 5 criteria and of specific interest to English Heritage are criteria 2 and 3, which state: 2. the building is worthy of retention due to its historic, architectural or landscape value, and 3. the building is structurally sound and suitable for conversion to a residential use without substantial rebuilding or extension and the alterations protect or enhance the character of the building and its setting. English Heritage agrees with the inclusion of these criteria as part of the policy, but is concerned that no supporting guidance is offered as to how these criteria are to be interpreted.	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION English Heritage believes that traditional farm buildings are more at risk from pressures on the countryside than any other type of historic building. In response to these pressures English Heritage has prepared a guidance document entitled ' <a href="#">The Conversion of Traditional Farm Buildings: A guide to good practice</a> ' (EH October 2006). In the event that North Norfolk District Council is unable to prepare a SPD to provide this additional guidance, then we would encourage the District Council to adopt the guidance set out in this English Heritage document and to cross reference this within the Policy. A copy of this English Heritage document is attached for your information and it is also available to download in a pdf format from the

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				HELM website. Furthermore, while criteria 3 makes reference to the setting of the building, English Heritage is of the opinion that this should be expanded to include the wider landscape, since one of the problems associated with the conversion of rural buildings is the associated requirement for residential curtilage which, if unsympathetically handled, is likely to adversely impact on this wider landscape. Finally, English Heritage would wish to see a clause added to the Policy to cover the automatic removal of PD rights for any conversion or re-use of rural buildings as dwellings, since there is a very strong likelihood of erosion to the character and appearance of these buildings and their setting through the inappropriate exploitation of permitted development.
Policy HO9	DP37, Mr John Cox	Object, Not Specified, Not Specified	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION There is a shortage of living accommodation in the Norfolk area and it seems to me that one way to eliminate the problem is to permit more conversions into homes, not into holiday lets. Also, those who currently own let property, which has a restriction on it (i.e. can only be lived in for xx weeks a year), should be allowed to apply for full residential use which would encourage more people to live permanently in the area. People who live permanently in an area bring in more money to the economy and the Council also receives more rates.	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION I would therefore recommend not only allowing all types of buildings to be converted into permanent homes but also allow holiday accommodation to be given permanent residential status.
Policy HO9	DP41, Mr Michael Sidebotham	Object, Not Specified, Not Specified	a) Biased views have been adopted to exclude large areas of Norfolk. b) All previous consultation documentation has deliberately excluded large areas of Norfolk which contain the majority of disused farm buildings. c) National Policy includes the full area and is not selective.	The policy document should apply to ALL farm buildings in the North Norfolk area and NOT be limited to the designated areas shown on the proposed Map.
Policy HO9	DP43, Ms Julie Chance, Trunch Parish Council	Support, Not Specified, Not Specified	I am writing to inform you that Trunch Parish Council support this initiative.	
Policy HO9	DP42, Mr John Tallowin	Support, Not Specified,	I do not understand all these legal type procedures. I just feel that barns in rural areas should be either residential or holiday as	

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		Yes	the owner sees fit. There are more than enough holiday and 2nd homes in our village. We need people with young families to help keep these villages alive.	
Policy HO9	DP45, Mr Mike Terry	Object, Yes, No	The supporting text in paragraph 2.4 includes the phrase a "condition may be attached to any planning permission removing any permitted development rights". There is no explanation of why this is included given in the text, but it is assumed that there are two main elements. First the General Permitted Development Order (GPDO) allows various alterations to the main structure of dwellings and second the GPDO allows various structures to be located within the curtilage of the dwelling both of these without the need to apply for planning permission. Since the policy is primarily aimed at buildings of "historic, architectural or landscape value" it seems appropriate for the Local Planning Authority to retain control over the future appearance of the dwelling and the site.	For increased clarity an explanation as to the reasons why the condition may be imposed would be of benefit. In addition the reference to the condition and the GPDO should be included in the policy rather than just in the supporting text.
Policy HO9	DP47, Mr Mike Terry	Object, Yes, No	The Core Strategy rightly identifies the importance of affordable housing in the District. However it is not obligatory for every development type to contribute to the solution of this particularly pressing problem Planning Policy Statement 7 Sustainable Development in Rural Areas sets out the national policy background to the re-use of buildings in rural areas in paragraphs 17 and 18. There is no mention of the provision of affordable housing in relation to the re-use of buildings. In PPS 3 which sets out in detail the approach to affordable housing there is no reference to requiring conversion of rural buildings to contribute to affordable housing provision. The policy requirement for affordable housing in the conversion of rural buildings is therefore not required as a part of delivering national policy. It is contended that that the conversion and re-use of rural buildings is not an appropriate policy vehicle for addressing this issue First conversion of rural buildings to residential use always presents a difficult design balance between retaining the traditional form and character of the building with the need for voids within the fabric to provide access, light and compliance with the Building Regulations. If affordable housing has to be provided on site there will inevitably be pressure to try and increase the number of units to be accommodated in the development. As a consequence there will be upward pressure on the number of doors and windows that will be punctured into the historic fabric to the detriment of the quality of the form and	The policy would be improved by the deletion of paragraph 5 of the policy.

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			<p>character that the policy is trying to conserve. Second re-use and conversion already bear considerable up front costs not associated with conventional new build. Invariably a structural survey will be required to demonstrate that the building is capable of adaptation without substantial rebuilding. In rural buildings there will often be a request for a survey to establish whether any protected species frequent the site, and if they do whether they can be adequately re-sited or mitigation measures put in place to ensure their continued use of the building. The construction costs are invariably substantially above new build construction, partly as result of needing extra materials to comply with sustainable construction and partly to do with more expensive labour costs associated with using traditional materials. Seeking a contribution to affordable housing where it is viable to do so adds another up front cost before an application is submitted. It will be necessary to undertake a viability study involving a detailed costing with detailed report outlining the expected return given the state of the market at the time the construction is complete. The provision of affordable housing as part of the conversion will further add to the expense of development as this will lead to the need to draw up a legal agreement, again before a decision notice is issued. Fundamentally adding the affordable housing dimension to the conversion and re-use policy is counter productive in its physical impact on the building and adds further to the costs and likely to result in fewer of the buildings of quality coming forward for re-use</p>	
Policy HO9	DP48, Mr Mike Terry	Object, Yes, No	<p>The majority of the policy is precise for example in terms of where it applies and importance of the buildings. However the introduction of the term "significant" in the reference to loss of jobs introduces an element of uncertainty into the policy. In drawing up the policy members were made aware of the existence of a number of existing developments that had been permitted under the previous policy or even earlier. Many of these permissions had holiday occupancy conditions attached to them preventing their use as permanent dwellings. Bearing in mind that the draft policy now endorses full residential development for the conversion and re-use of rural buildings it would seem logical to indicate that the planning authority would use this policy to determine applications for the removal of holiday occupancy conditions</p>	<p>The final paragraph of the policy should be changed to read: "Proposals that would result in the loss of 20 or more jobs will not normally be permitted". A note should be added to the explanatory text stating that the policy would be used to determine applications for the removal of holiday occupancy where the development had resulted from a previous decision on the conversion and re-use of a rural building</p>

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Policy HO9	DP49, Mrs Pamela Gibbard	Object, Yes, No	The Draft Policy is too restrictive in only allowing conversion of buildings within a 1km radius of certain selected settlements. It should apply to the whole area equally in order to contribute to the sustainability of the smaller villages and hamlets. Even 2km is not unreasonable for cycling or walking. Under the previous policy the only option to rescue farm buildings from dilapidation was for commercial use and conversion to holiday accommodation at some considerable cost for little return. It is therefore appropriate to remove the holiday occupancy conditions of previously converted barns and other similar properties. Again this should apply to smaller villages and hamlets, not just selected settlements.	Apply the conversion of buildings to the whole rural area. Extend the range to 2km of a facility e.g. farm shop, public house etc. Remove the holiday occupancy conditions of previously converted barns and other similar properties.
Policy HO9	DP50, Mrs Joanna Otte, Little Snoring Parish Council	Support, Yes, Not Specified	Little Snoring Parish Council welcomes this policy. It believes that it is a step in the right direction, but it remains concerned about the deliverability of 50% affordable housing. The other criteria seem appropriate. The Parish Council hopes that the policy will help to prevent the decline of non-service villages, thus making rural communities more viable and sustainable for the future.	
Policy HO9	DP51, Mrs Joanna Otte, Great Snoring Parish Council	Object, Yes, No	Great Snoring Parish Council welcomes this policy. The Parish Council hopes that the policy will help to prevent the decline of non-service villages, thus making rural communities more viable and sustainable for the future.	Great Snoring Parish Council believes rural buildings should be allowed to be converted to residential use anywhere in the District and that there should be no restrictive conditions such as schools, transport, employment.
Policy HO9	DP52, Mr & Mrs Andrew & Fiona Moncur & Thompson	Object, Not Specified, Not Specified	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION. We oppose the proposed changes to North Norfolk's planning policy on converted farm buildings. We do so on the grounds that the methodology is unsound and that, as they stand, the proposals will have the most unfortunate impact on the very communities which are most in need of help. Villages which have the least in terms of local facilities (as defined by the policy outline) will be condemned to the most useless form of development: yet more second homes standing empty for the greater part of the year and owned by absentees with only the faintest commitment to the area they seldom visit. Places with (in the planners' eyes) the fewest assets to community life will get no new members of a true community, living there year-round and playing an active part in daily life. A more sensible and relaxed approach is urgently needed. The policy approach, as	OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION. A more sensible and relaxed approach is urgently needed.

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			<p>outlined, seeks to restrict re-use of old farm buildings as permanent homes only to locations where the new occupiers would have access to certain “key’ local facilities. These zones would extend one kilometre around 44 specified villages. The facilities chosen for this test exercise include a school, a pub, a petrol station. The proposal is that the newcomers will walk everywhere, rather than use their cars. The aim is to contribute to “sustainable development objectives’ in these places. This choice fails to appreciate the realities of village life, firstly in its choice of supposedly “key’ facilities. The quality of a village is not determined by whether or not it has a pub or a convenience store. What counts far more is a vibrant village hall with, say, mother-and-child groups, youth activities, women’s clubs, sports facilities. The village of Hindringham, for example, fails the frankly inadequate test set out in this document: it has no pub or daily post office. Yet it is a place with a far more active community than many of those which “pass’. Consider the new publication The Book Of Hindringham, compiled by the Hindringham History Group, which sets out the diverse aspects of life there. Church and chapel, football and cricket clubs, fitness groups, all the activities surrounding the school; the list is considerable. The policy proposal fails to answer the question: why if sustainable development is desirable in, for instance, the area around Walsingham is it not desirable around Hindringham? When villagers already living in existing houses, in existing villages, use their cars to go everywhere why should new arrivals, moving into old farm buildings, realistically be expected to walk? We live in a hamlet, known as Field House, equidistant from Binham, Hindringham and Great Walsingham. It originally had homes for six families, all full-time residents, around a group of redundant farm buildings. These barns were converted into a dozen houses. To our knowledge several families, wanting to live here permanently and play a full part in the life of the community, explored the possibility of buying these newly-converted homes. Due to North Norfolk’s restrictive policy, limiting these buildings to use only as second homes, these would-be residents were deterred. The result: another hamlet with a hollow centre. The barns now belong to people who live away; they stand unused for all but a small part of the year. The owners play no part in taking the elderly neighbours to hospital or helping to care for the children next door. We want people to live here. What is proposed is a useless policy which doesn’t even look good on paper, let alone on the ground.</p>	

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Policy HO9	DP53, Mr David Aldridge	Object, Not Specified, No		The policy should fall in line with a national strategy. All Council planning policies should be in line with government guidelines.
Policy HO9	DP54, Mr Ian Smith, Church Commissioners for England	Support, Yes, Yes	We support the draft policy and believe that it represents the most sustainable approach in dealing with the conversion of rural buildings to dwellings. By allowing conversions predominantly in close proximity to existing sustainable settlements, it ensures that new residents will be able to access services and facilities easily. The other criteria in the draft policy relating to the 'value'/character of the building, structural suitability and scale are all suitable and we agree with their inclusion. We would raise concerns regarding the requirement for affordable housing on proposals of two or more dwellings. In this respect, it is imperative that the policy is applied flexibly and financial viability needs to be given significant weight when considering proposals. Conversions often involve high construction costs and the requirement to provide affordable housing may have serious implications on financial viability. The objective of the policy is to secure the future of buildings of character and a strict requirement for affordable housing, where this can not be achieved in a viable manner, could prevent this objective actually being achieved. Furthermore, rural building conversions are also unlikely to appeal to RSLs due to greater difficulty and costs associated with ongoing maintenance.	
Policy HO9	DP55, Mr George Bell, Anglia Farmers Limited	Object, Not Specified, No	The draft policy is unsound because it is neither justified nor effective. The draft policy is not justified because it ignores the majority of comments made by consultees in the course of the previous round of consultation, specifically the responses to Questions 7 and 12. The vast majority of consultees opposed the approach of restricting residential conversions on a selective geographic basis, pointing out that there is no logical basis for such a restriction if the purpose of the policy is to meet provisos 2 to 4 of the draft policy. The policy document provides no justification for restricting residential conversion/re-use to 44 or any other number of specified settlements, and, such a restriction is inconsistent with the achievement of the stated	Delete proviso 1 of the draft policy, removing all reference to the requirement for permitted residential conversion/re-use to be within any defined area.

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			purpose of the policy. The draft policy is not effective because the aims of the policy - to help support the sustainability of rural communities and services and to secure the future of traditional rural buildings - would be achieved more effectively if the arbitrary restriction of residential conversion to 44 settlements were to be removed.	
Policy HO9	DP57, Mr Norman Lamb MP, Member of Parliament for North Norfolk	Object, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Although quite restrictive, it seems to me to be pretty fair and right for North Norfolk. It is an advance. The main point as I see it is that they get rid of this restrictive "44 selected villages" which does seem a nonsense. It really should be the whole of north Norfolk as they have covered themselves anyway by saying that it has to be exceptional buildings, and apart from listed buildings, they can be the judge of that. I think all redundant rural buildings should be considered, particularly when you consider that they said in their own appraisal assessment: Conversion of existing buildings is an efficient use of land (from the Sustainability Appraisal). If the buildings are already there, it makes sense to use them, providing that they are suitable for conversion.	
Policy HO9	DP58, Mrs Joanna Otte, Kettlestone Parish Council	Support, Yes, Yes	Kettlestone Parish supports this policy. Allowing the conversion of rural buildings for residential purposes makes complete sense.	
Policy HO9	DP59, Mrs Julie Chance, Sea Palling & Waxham Parish Council	Support, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> I am writing to inform you that Sea Palling & Waxham Parish Council support this initiative.	
Policy HO9	DP60, Ms Sinead Maloney, Broadland District Council	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Thank you for consulting Broadland District Council on this Matter. It is possible that a walking distance of 1 kilometre to the settlement boundary may be a bit excessive, as residents will have to walk further into the settlement to access community facilities. For example, Broadland District Council Local Plan policy GS3 uses a distance of 250m from a settlement boundary as an appropriate walking distance. Restricting the majority of the developments to a shorter distance may help to encourage residents to walk to local facilities rather than relying on the car, thereby promoting a healthier lifestyle and ensuring reasonably good access to jobs, services and community facilities.	<a href="#">(SEE ATTACHED FILE)</a> More particularly, neither the policy nor the supporting texts are clear in specifying and explaining the criteria for the distance applied. It would be helpful if the choice of distance was explained. Finally the Policy should make regard to the protection of biodiversity. A sentence could be added as follows 'when considering conversions regard should be had to the possible effect on the habitats of creatures which are protected under the Wildlife and Countryside Act 1981'.
Policy HO9	DP61, Mr Glenn Berry	Support, Yes, Yes	Happisburgh Parish Council supports the proposed policy.	

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Policy HO9	DP63, Holkham Estate, Holkham Estate	Support, Yes, Yes	<p>OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a> FOR FULL REPRESENTATION</p> <p>Paragraph 2.1 as a supporting paragraph to Policy HO9 acknowledges that there are many rural buildings within North Norfolk, especially those which have been developed in connection with agriculture, which are no longer required or suitable for their original use. Such buildings are potentially an important resource and in many instances contribute positively to the character and appearance of North Norfolk's rural landscape. Such is the case with many of the buildings within the landholdings of the Holkham Estate and as such, sympathetic re-use of suitable and appropriate buildings can contribute to Core Strategy policies, particularly those relating to sustainability in terms of reducing the need for new buildings in the countryside (i.e. best use of existing resources) and by supporting rural economies and communities. However, the Estate does accept that there is a balance to be struck between protecting the countryside from inappropriate development whilst promoting sustainable rural communities. An assessment of a new policy approach for North Norfolk as it relates to the re-use of rural buildings is set in the context of increasing demand for conversion of non-residential rural buildings and in particular the amount of attractive agricultural buildings which are either redundant or of limited use, to permanent dwellings. Such a demand perhaps is not unexpected given the attractive nature of North Norfolk and the relatively buoyant housing market which creates the demand. Consequently, it is important for the Council to have a sensible robust policy to address these matters and this was the issue raised by the Inspector at the Core Strategy Inquiry. His comments in particular related to 'location' and 'building type', both of which are directly relevant to the Estate's property holdings. Concerning location, whilst allowing conversions in locations well related to identified settlements consistent with PPS7, he also noted that other locations less well-related to settlements could play an important role since they would provide for rural housing and sustain the viability of village services and facilities consistent with PPS3 housing objectives. Regarding building type, he commented that the type of building was a relevant consideration and accepted the criteria requiring the housing to be of historic, architectural or landscape value. However importantly in our view, he questioned the lack of policy guidance regarding such buildings in locations away from selected settlements. This latter issue is a very important matter</p>	

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			<p>for the Estate given that many of the buildings that would fall to be considered for conversion lie outside identified settlements and in some cases, in more isolated sites within the District. On behalf of the Holkham Estate, Savills made representations to the previous draft consultation document to seek further clarity on the description of these buildings which would be considered appropriate for conversion. Previously restricted to listed buildings outside the designated areas around identifiable settlements, paragraph 2.3 states: "In the case of Listed Buildings or buildings that would meet the Council's Criteria for Local Listing, residential conversion may be achieved irrespective of location, provided such a use was demonstrated to be the optimum to secure the future of the building..." (Italics are our emphasis). The importance of this clarification should not be underestimated since it appropriately responds to specific rural issues in terms of sustaining the vitality of rural communities and services and also secures the future of traditional rural buildings that positively contribute to the local distinctiveness of North Norfolk. Whilst we support the more permissive nature of the policy compared to earlier policy statements, the Council should not expect a rash of new applications for buildings that would not otherwise be the focus for conversion. The control mechanism to identify appropriate buildings remains within the policy, i.e. its quality given it's historic, architectural or landscape value. Such criteria relates to buildings throughout the District including those lying outside the designated policy areas. Layered on top of these criteria for those buildings outside the designated policy area, is a test demonstrating that re-use for residential would best secure the future of the building having regard to its soundness and suitability for conversion, the scale of conversion in terms of numbers and the affordable housing requirement having regard to viability. The effect of this policy as it now affects the Holkham Estate is to provide a policy framework against which it needs to consider its assets, both within designated policy areas shown within Appendix 1 of the document but also important to the Estate properties which fall outside such areas. Having regard to the latter, the Council's criteria for local listing will be important given that there are a number of Estate properties which may not be listed but which fall into such a category - such criteria acknowledges the importance of a building's architecture, contribution to townscape/landscape, historic importance and state of construction. All of these matters will be relevant in</p>	

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			considering which properties could be subject to policy H09. Our clients are supportive of the Council's proposed Policy H09.	
Policy HO9	DP64, Dawn Wakefield	Object, Yes, No	This document is not justified for 2 main reasons: 1. The people making the decision on this draft policy appeared to disregard the majority view expressed through the initial consultation in which about 70% of respondents were in favour of a less restrictive policy. ALL villages need help to be sustainable which will be helped by having more permanent residents. Most villages have more than enough holiday lets and second homes: a policy that favours more commercial use in the unselected villages will continue the trend of many more small villages becoming unsustainable because of the disproportionately small quantity of permanent residents. 2. The methodology used to select villages where residential conversion is to be allowed - is seriously flawed. A primary school is only relevant to a small proportion of the population, for a small proportion of their lives. With the existence of internet shopping and delivery, a shop is not essential to avoid car travel for shopping, and it is extremely unlikely that a convenience store will stop most people relying on regular supermarket shopping by car. A shop is not a reliably permanent feature and will lead to illogical rules - once the shop has closed presumably the village will not be deselected from the list? If the idea is to have facilities in walking distance what is the logic in including a garage or filling station, which is obviously somewhere one goes in a car. The method also ignores the fact that many small villages have informal community facilities such as a bar/social club in the village hall or a farm shop. These community facilities are likely to be at least if not more long lasting than commercial ones. Sustainability is about the number of people living and working in an area and so forming a community, not about whether they can reach one or two of the many centralised services they regularly need without a car. Modern life requires ALL villagers to travel for a lot of essential services and facilities. These criteria are not justified as a method of selecting permitted location for residential re-use of rural buildings.	Option 5 as given in the initial consultation document would be a more appropriate statement of permitted locations.
Policy HO9	DP65, Mrs Margaret Foster, North Walsham Town Council	Comment, Not Specified,	North Walsham Town Council has considered the conversion and re-use of rural buildings as dwellings draft policy and agreed that each application should be considered on individual merit.	

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		Not Specified	They considered it was better to renovate old barns than leave them to deteriorate but much would depend on access etc., hence the decision that each should be dealt with on individual merit.	
Policy HO9	DP66, Mrs Amy Hanner, Norfolk County Council (Highways)	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> Transport Comments: Norfolk County Council does not wish to raise any soundness objection from a highways perspective. However, Ryburgh, Neatishead and Tunstead are poorly served by public transport and do not meet the County Council's access to services by public transport indicator, currently defined as: areas that are unable to reach a market town or key service centre at least twice a week by public transport within 30 minutes (arrival between 9am and 12pm, departure between 2pm and 5pm).	
Policy HO9	DP67, Mr Stephen Faulkner, Norfolk County Council	Comment, Not Specified, Not Specified		<a href="#">(SEE ATTACHED FILE)</a> Infrastructure Comments: While policy HO9 does indicate that the level of housing should be of an appropriate scale, it may be sensible to cross-refer, either in the policy or in supporting text, to the following Core Strategy policies: Policy SS6 Access and Infrastructure, Policy CT2 Developer Contributions.
Policy HO9	DP68, Dr Marie Stong, Norfolk County Councillor (Wells Divison)	Comment, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILE)</a> The local County Councillor for Wells (Dr Marie Strong) has raised a number of issues on the above Single Policy Review. Most of these issues, for example relating to the need to protect tourism accommodation and support affordable housing, have been addressed in Policy HO9 and the supporting text. However, Dr Strong has also raised an issue concerning infrastructure provision. In particular, she has highlighted that residential development outside existing settlement boundaries could put pressure on transport provision. See also officer comments on infrastructure (SEE DP67).	
Policy HO9	DP69, Ms Anita Ragan, Norfolk County Council	Support, Not Specified, Not Specified	<a href="#">(SEE ATTACHED FILES DP66-68, DP69)</a> Thank you for consulting the County Council on the above Single Policy Review. The comments attached are made on a without prejudice basis (SEE DP66, 67, 68). The policy is broadly supported by the County Council. This policy offers a degree of flexibility over where residential conversions may be acceptable in a rural context, and should assist in maintaining	

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			sustainable rural communities. Notwithstanding the attached comments, the County Council as Highway/Transport Authority would expect any proposal for the reuse of rural buildings to satisfy highway safety criteria.	
Policy HO9	DP71, Mr Richard Mickleburgh, Aylmerton Parish Council	Object, Not Specified, No	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The Parish Council has carefully considered the Draft Policy and while we would not challenge its legality, we believe it is "UNSOUND" on the grounds that it would not be effective. We are of the opinion that, in places, the wording is cumbersome and the policy lacks clarity. It is vitally important the public at large are left in no doubt as to the policy's precise aims and objectives. The overriding aim of the policy must be to preserve all traditional rural buildings of historic and architectural interest wherever they may be located within the District. These buildings, many of which are located within the Norfolk Coast Area of Outstanding Natural Beauty, are part of our heritage and make an important contribution to the rural landscape. North Norfolk is not the first district to be confronted with this issue. As a consequence, we have carried out a measure of research into how other districts have formulated and gained subsequent approval to a policy to adequately preserve such buildings.</p>	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The overriding aim of the policy must be to preserve all traditional rural buildings of historic and architectural interest wherever they may be located within the District. It is our view, that North Kesteven District Council, in Lincolnshire, has successfully developed an approved policy that is clear and concise and further addresses all of the concerns that NNDC seeks to address in its draft policy, without the necessity of stipulating that a building must be within a certain (and arbitrary) distance of specified town or village. We have attached a copy of the relevant North Kesteven policy - DC6 - "Conversion of buildings in the countryside to residential use", the content of which, we believe, should be adopted by NNDC. Only minor amendments are deemed necessary to meet precise local needs e.g. to accommodate NNDC's wish that only buildings constructed before the end of 1947 should be considered under the terms of the policy.</p>
Policy HO9	DP72, Mrs Elaine Pugh, Southrepps Parish Council	Object, Not Specified, Not Specified	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The proposed Policy HO9 is too complex to administer and NNDC should allow all rural buildings or dwellings to be used as residential homes. It is essential however, that funding towards Affordable housing is secured from this source. It is imperative that any building should not be left to decay and erode in the countryside; all buildings should be utilised wherever possible and financially feasible to do so.</p>	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The Policy of HO9 is unacceptable and we would refer you to the original option 5 criteria and suggest that this is the correct policy. Would allow the conversion of buildings of historic, architectural or landscape interest anywhere in the district provided the proposal would not be detrimental to the character or special interest of the building or setting. The Parish Council feels strongly that these buildings must be used to build communities and utilised as homes.</p>
Policy HO9	DP70, Mr Anthony Hayward, Gunthorpe Parish Council	Object, Yes, No	Please note that whilst the policy may be compliant it is unsound to discriminate between one postcode and another, i.e. we object to being a Parish excluded from one of the specific areas shown	Rural buildings should be permitted to be converted to permanent dwellings throughout the North Norfolk District Council area, and not just

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			on the map. Rural buildings should be permitted to be converted to permanent dwellings throughout the North Norfolk District Council area, and not just converted into holiday/second homes.	converted into holiday/second homes.
Policy HO9	DP74, Mr Michael Foale	Object, No, No	The proposed policy effectively excludes the conversion of any building other than those of Historical or Architectural importance. I consider this to be overly restrictive and excessive when considered against the criteria set out in Government policy PPS7 (re-use of buildings in the countryside par17). There are numerous opportunities for the conversion of perfectly sound and suitable buildings including ancillary accommodation and the subdivision of larger properties. The main criteria against which such proposals should be judged includes the following: Is the proposal in a sustainable location? Are there any amenity issues? Is there any unacceptable impact on neighbours? Are there any traffic concerns? Can the conversion occur without the need for substantial extensions? One should also consider that with the passage of time the availability of such sites will diminish, however in the meantime such conversions can provide a substantial contribution to the rural economy.	The policy should permit the conversion of buildings as set out above. I consider this to be more within the scope of the intended policy set out in PPS7.
Policy HO9	DP75, Mr Paul Stevenson	Object, Yes, No	The proposed Policy stresses the importance of supporting the sustainability of rural communities - as evidenced at para 2.1 and 2.7. However, this objective will not be achieved if rural buildings are converted into holiday homes or second homes. Second homes and holiday homes that are empty for extended periods, particularly through the winter months, are a major obstacle to building sustainable rural communities. They drive up the price of housing beyond the means of local people and make local shops uneconomic, leading to the all too prevalent 'empty village' syndrome.	In order to make the commitment to sustainable rural communities effective, permission for conversion pursuant to Policy HO 9 should impose an obligation that occupation will be restricted in perpetuity to 'local occupation'. Clear precedents for such a restriction can be found in Core Strategies elsewhere, for example in the Peak District. Local occupation, as in the Peak District, should mean that the occupier has lived in the immediate area (e.g. the parish or an adjoining parish), for an extended period. The Peak District policy stipulates 10 years aggregated over the past 20 years to allow for absence at college etc., and this is a sensible way of encouraging young people brought up in the area to remain or return as residents. Imposing such a condition will make a mJOR contribution to ensuring that granting exceptional approval for the residential conversion of rural buildings will make an effective and lasting contribution to sustainable rural communities.

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Policy HO9	DP76, Mrs Mo Anderson-Dungar, Colby Parish Council	Support, Yes, Yes	In general, the policy did not seem to address the possibility of affordable housing outside zones of development, nor the confusion between holiday and residential in the light of forthcoming tax changes.	
Policy HO9	DP77, Mr James Spencer Ashworth	Object, Yes, No	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>Draft Policy H09 section 5: I consider that the proposal that not less than 50% of the dwellings must be affordable or that an equivalent financial contribution be made is inappropriate. Conversion of rural buildings is normally small scale, both in physical and economic terms, compared to urban development and any effect on the number of dwellings in a nearby village or development is likely to be beneficial rather than otherwise. This proposal, which is effectively a swingeing tax would basically render almost all rural developments unviable and effectively make the whole of the rest of the policy a box ticking exercise. Background &amp; Methodology section 3.0.2 "Locations": I do not consider that the methodology used in selecting locations is correct. Whereas it may be reasonable to limit new housing to villages with certain "key facilities" this is not necessarily the same for existing rural buildings. First of all they do, by definition, already exist and secondly they are, by their nature, often too far to be within convenient walking distance of these key facilities whether they are within 1km or not. Background &amp; Methodology 3.0.15 "economic uses": It is incorrect to suggest that, by disbaring them from becoming domestic use, old fashioned rural buildings would continue to be available or appropriate for re-use for economic purposes; neither is it logical to assume that a redundant farm building used for, say, light industrial purposes is any more environmentally friendly than use as domestic residence in terms of transport etc. This should be revised.</p>	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The liability to pay for affordable housing should be dropped for all but the largest developments - say 5 properties or more not 2. The "1 km rule be abandoned in favour of a more inclusive policy.</p>
Policy HO9	DP79, Mrs Sharon Austin	Object, Not Specified, Not Specified	The current policy does not work in terms of financial viability for North Norfolk or for fairness and choice to the person. What right does a Council have in deciding where and how long a person can live in a home of their choice when even the Government does not restrict a person's right to live where they wish? Also, the current Policy affects local people who are born and breed in North Norfolk and who may be in a position to buy and convert a barn to live in as their main residential home, but cannot do so as they would only be able to use it as a second home/holiday let and would need to show that they have a main residence somewhere else. This is especially significant as there is	Therefore, we would like for all existing and new barns (where they do not affect local jobs), for the holiday restriction to be lifted or not applied so that these barns can be restored rather than just decaying in the countryside and not being of any use whatsoever. This will assist the local farmers and encourage money into the area.

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			<p>currently a shortage of affordable homes in North Norfolk and for a local builder to buy a barn and convert it himself would be more cost effective than having to pay for a developer to build him/her a home to the standard that they require. Also, we believe that the impact of being able to live full time in new and existing converted barns would generate more money into the area, rather than using the barns purely for a holiday purpose. People would in their daily lives use the local shops, restaurants and amenities, pay full council tax and could even generate jobs for the area by setting up their own businesses. The argument that North Norfolk Council restricts use of these barns due to them not being able to provide the infrastructure, i.e. not enough doctors, schools etc. does not hold water when you think that they have just agreed for more than 100 homes to be built on the land at Gresham's School.</p>	
Policy HO9	DP85, Mrs Elizabeth Purdy	Object, Not Specified, Not Specified	<p><a href="#">(SEE ATTACHED FILE)</a>  Outside locations identified, residential use will not be permitted unless building is of exceptional historic architectural or landscape value and residential use would best secure future of the building.  What is meant by exceptional? Does this include barns within the curtilage of a listed farmhouse and which forms part of the homestead? This point needs to be defined in the policy. A listed farmhouse surrounded by decaying buildings would not fulfil this criterion. Most such farmsteads are in rural sites near to small villages, at present excluded by the policy, thus defeating the object of the policy. Who is to define what is exceptional?  A new policy needs to address the problems of rural sustainability and deprivation, as well as decide what is to be done with redundant farm buildings. These rural brown sites form part of the heritage of North Norfolk and cannot be allowed to decay. Small village communities need reinvigorating. The 44 larger villages chosen at present do not address this problem at all. The Council should embrace this opportunity to benefit from a valuable resource.</p>	

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Appendix 1 - Map of Proposed Designated Policy Areas	DP14	Object, Yes, No	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>The boundary to the north of Fakenham should be extended by about 250 metres as there are two redundant traditional farm buildings, as shown on attached plan and photographs, which will have little future without residential development. Research would have identified these two buildings.</p>	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>Boundary of designation to the north of Fakenham should be extended by c.250 metres towards Thorpland to include barns shown on attached plan, known as Alethorpe Barns.</p>
Appendix 1 - Map of Proposed Designated Policy Areas	DP73, Mr John Yardley, Style Space Ltd	Object, Not Specified, Not Specified	<p><a href="#">(SEE ATTACHED FILE)</a></p> <p>As officers will be aware, RAF Neatishead covers an area of 12.9 hectares and is located within open countryside, midway between the villages of Neatishead and Horning. The nearest significant settlement is Hoveton approximately 5km west of the site. As identified in previous representations, the site has played a significant role in British Aerospace history, with it being the longest continuously operational radar site in the world between 1941 and 2004 when radar operations ceased due to a draw down of the station. Since, a number of buildings on the site have been used for the Air Defence Radar Museum. Given its historical connections a number of the buildings on site are statutorily listed. The revised Policy HO9 indicates that conversion and re-use of suitably constructed buildings in the countryside for residential development will be permitted providing that they are within the area identified on the proposals map, worthy of retention and suitable for conversion to residential use. In relation to the revised policy, the map accompanying this letter provides a focused version of Map 1 taken from Appendix A 'Proposals Map Amendments'. This map illustrates the new designation area in relation to Horning and identifies that around 80% of our client's land at RAF Neatishead has been included within this area but appears to omit some buildings on site. We suggest that for consistency, the designation should cover the whole site. If this were the case, we would endorse the revised policy HO9 of the Core Strategy.</p>	<p>OFFICERS SUMMARY - <a href="#">SEE ATTACHED FILE</a></p> <p>FOR FULL REPRESENTATION</p> <p>Amend the proposed designated area to include 100% of RAF Neatishead site.</p>

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Appendix 1 - Map of Proposed Designated Policy Areas	DP78, Mr James Spencer Ashworth	Object, Yes, No	<p><a href="#">(SEE ATTACHED FILE)</a>  Map 1, Conversion and Reuse of Rural Buildings as dwellings: Even if the proposals were to be accepted in their present form I believe that the proposed boundary between Fakenham and Little Snoring of just a few hundred metres is anomalous and unfair. We submit that proper consideration has not been given to the precise boundary in this area. In particular the drive leading up to the old farm buildings known as The Alethorpe Buildings is partly included in the designated policy area; whereas the buildings themselves are excluded.</p>	<p><a href="#">(SEE ATTACHED FILE)</a>  That the two development areas of Fakenham and Little Snoring are fused in respect of rural buildings or that the Fakenham area is extended by some 250 m to the North to include the buildings known as The Alethorpe Buildings [map attached]. This change is in accord with the proposed policy which states that the development area boundary should be “broadly” 1 km around development areas (see paragraph 1.23 in draft policy) N.B. These buildings already have planning permission for restricted holiday use and have been marketed for some 9 months with no success. It would seem that there is little future for these buildings without full residential planning permission.</p>