Ormesby St Margaret with Scratby Neighbourhood Plan 2026-2042 Consultation Statement





June 2026

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Introduction

This Consultation Statement has been prepared by Ormesby St Margaret with Scratby Parish Council in support of the Ormesby St Margaret with Scratby Neighbourhood Plan (2026–2041). It sets out the consultation undertaken at the Regulation 14 (Pre-Submission) stage, summarises the main issues raised, and explains how these issues informed amendments to the final version of the Plan.

The statement also summarises the earlier engagement undertaken during preparation of the Neighbourhood Plan, demonstrating how community views and stakeholder input have shaped the development of the Plan.

This Consultation Statement has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012.

The Neighbourhood Plan

The Ormesby St Margaret with Scratby Neighbourhood Plan covers the period 2026 – 2041 and applies to the parish of Ormesby St Margaret with Scratby which includes the three villages of Ormesby St Margaret, Scratby and California.

The Plan sets out a vision, objectives and planning policies to guide development within the neighbourhood area. Once made, the Neighbourhood Plan will form part of the statutory development plan for the area and will be used in the determination of planning applications alongside national and local planning policy.

Earlier engagement and preparation of the Plan Review

Preparation of the Neighbourhood Plan Review has been informed by ongoing engagement with the local community and stakeholders prior to the Regulation 14 consultation.

The Parish Council established a Neighbourhood Plan steering group to guide preparation of the Plan. The group met regularly to review evidence, identify local issues and develop draft policies.

Early engagement included:

- A community survey undertaken in 2021
- Parish Council meetings where Neighbourhood Plan progress was discussed
- Steering group meetings to develop the vision, objectives and policy approach
- Review of local evidence including environmental context, flooding information, and housing needs.

Through the community survey, undertaken between January and March 2021, residents were invited to help shape the emerging Neighbourhood Plan by identifying the local issues, places and priorities they considered most important, including:

- the natural and historic environment
- coastal erosion
- future housing and design
- infrastructure

- movement links
- community facilities

This feedback directly informed the vision, objectives and policies within the draft Neighbourhood Plan Review and shaped the approach taken in the Regulation 14 consultation.

Overview of the Regulation 14 consultation

The Regulation 14 consultation on the pre-submission version of the Fleggburgh Neighbourhood Plan Review was undertaken over a six-week period from 30 March to 10 May 2026 in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

The Regulation 14 consultation provided an opportunity for residents, businesses, landowners, stakeholders and statutory consultees to comment on the draft Plan prior to submission.

Consultation methods

The consultation was publicised through a range of methods to ensure that residents and stakeholders had the opportunity to comment on the draft plan.

How people were consulted

- The draft Neighbourhood Plan and supporting documents were made available on the Parish Council website
- Stakeholders were sent an email including a link to the draft plan and supporting documents (see Appendix E)
- Distribution of a consultation leaflet to all households in the parish providing details of the consultation period and how to respond
- Consultation posters were displayed in the parish publicising the consultation period and survey link
- Printed copies of the draft Plan were available to view at 3 locations in the Parish – one in each village

Methods of response

Responses could be submitted via:

- Online questionnaire
- Hard copy questionnaire
- Written representations submitted directly to the Parish Council

Who Was Consulted

The consultation was undertaken in accordance with Regulation 14 requirements and included:

Statutory and non-statutory consultees

The draft Plan was circulated to statutory consultees and other stakeholders whose interests may be affected by the proposals contained within the Plan. These included organisations responsible for planning, transport, environmental protection, health services and infrastructure provision. A full list of consultees contacted during the consultation is provided in Appendix A.

Responses were received from the following organisations:

- Great Yarmouth Borough Council
- Anglian Water
- Historic England
- National Highways
- Natural England
- Public Health (Norfolk County Council)
- Norfolk Constabulary
- Norfolk County Council
- Norfolk Wildlife Trust
- Water Management Alliance (Internal Drainage Board)

Owners of NDHAs and proposed Local Green Spaces were contacted as part of the consultation to invite their feedback.

Local community

13 responses were received from local residents which includes 3 emails sent directly to the Parish Clerk.

Summary of issues raised

This section summarises the key issues raised during the Regulation 14 consultation. A detailed schedule of responses is provided in the Appendices to this report.

Overview of responses

A total of 23 responses were received during the Regulation 14 consultation, comprising:

- 10 statutory and stakeholder responses
- 13 responses from local residents

Summary of Resident Responses

A total of 13 responses were received from residents during the Regulation 14 consultation. 10 of these were completed surveys and 3 were emails or telephone contact received directly by the Parish Clerk. Respondents were asked to indicate the extent to which they agreed with the proposed policies in the Ormesby St Margaret with Scratby Neighbourhood Plan and were also invited to provide written comments. Responses were received from residents of Ormesby St Margaret, Scratby and California. The 3 responses received directly by the Parish Clerk during the Regulation 14 consultation period raised individual property-specific matters, including concerns about land within the coastal rollback area and comments on the identification of buildings of local historic interest. They have been recorded and considered alongside the other Regulation 14 responses.

Taken as a whole, the responses showed mixed views on the draft Neighbourhood Plan. Responses showed a mixed but slightly positive overall position. Six respondents indicated that they were generally in favour of the Plan, while five indicated that they were not. Responses showed support for a number of individual

policy areas, particularly those relating to the natural environment, walking and cycling, community facilities, heritage, and the protection of local views.

Responses to the **housing and design policies** were mixed. Some respondents supported the approach to affordable housing, housing type and mix, and design, including comments about the need for homes to reflect local character, provide for smaller households, and improve energy efficiency. Other respondents objected to further housing growth or larger-scale development, particularly where it would affect village character, traffic, infrastructure, greenfield land, agricultural land, wildlife habitat or the setting of heritage assets. Several comments suggested that any further housing should be carefully managed in scale, with a preference expressed by some respondents for smaller infill development rather than larger expansion.

The **visitor parking policy** also received mixed support. Comments recognised that parking is already a local issue, particularly during peak visitor periods, and referred to on-street parking pressures in Scratby, California Avenue, Beach Drive and areas close to the beach. Some comments supported the inclusion of sustainable drainage and biodiversity enhancements in parking design. Others questioned the deliverability of the policy, the relationship with land ownership, and the need to ensure that visitor parking proposals do not disadvantage residents who rely on on-street parking.

The **community facilities policy** received a generally mixed but slightly positive response. Some respondents supported the protection and enhancement of community facilities, with Scratby Village Hall identified as an important local hub used for residents' groups, quiz nights and other community activities. Other comments raised concerns about whether the Parish Council had a sufficiently clear delivery plan or strategy for future community facilities, and whether wider infrastructure, including sewage, water, health and education provision, could support the level of growth expected in the wider area.

The **walking and cycling policy** received a generally positive response. Written comments supported the protection and enhancement of existing footpaths, better walking and cycling links, and the provision of safer, greener routes where this is possible. Specific comments referred to the value of existing footpaths around Scratby Hall, the Norfolk Coast Path, the lack of signposted cycleways and cycle parking in Scratby, and the potential extension of existing routes, including towards California Road.

The **natural environment policies** were among the more strongly supported parts of the Plan. There was support for greener development, Local Green Space, important local views and the policy approach to properties at risk from coastal erosion, although some individual responses expressed strong disagreement. Written comments highlighted the value of allotments, local views, sea views, open countryside, wildlife habitats and the landscape around Scratby Hall.

Coastal erosion was also an important theme. Some respondents supported measures to help people affected by coastal erosion, including relocation or access to alternative housing. Others expressed concern about the fairness, cost and practical implications of supporting properties already known to be at risk. Comments

also referred to the need to recognise coastal change as a long-term planning issue and to avoid locating vulnerable development in areas at risk.

The **heritage and historic environment policies** received a broadly positive response, with a majority of respondents either agreed or strongly agreed with the policy on the Ormesby St Margaret Conservation Area and the policy on non-designated heritage assets. Written comments supported the protection of locally important heritage assets, including Alma Cottages and cottages on Beach Road and at California. Comments also highlighted the significance of Scratby Hall and its setting, including its historic parkland context and views to and from the Hall.

Final comments reflected the overall mixed nature of the survey response. Supportive comments generally welcomed the Plan but sought careful monitoring of future development, protection of local character and services, and stronger recognition of environmental and heritage issues. Objecting comments focused on opposition to further housing growth, concern about larger-scale development, criticism of the consultation process, and concerns that the Plan may be out of date or difficult to deliver.

The issues raised through the resident survey are broadly consistent with the main themes that have shaped the Neighbourhood Plan: managing the type and design of new development, protecting local character, safeguarding green spaces and views, supporting community facilities, improving walking and cycling, conserving heritage assets and addressing the effects of coastal change. The Parish Council has considered all responses received and, where appropriate, the Plan has been reviewed to ensure that it remains locally distinctive, proportionate and responsive to the issues raised during consultation.

Stakeholder and statutory consultee responses

Responses were received from a range of statutory consultees and other stakeholders. The responses were generally supportive of the preparation of the Neighbourhood Plan and its overall strategy. **Great Yarmouth Borough Council** provided the most detailed response, suggesting a range of amendments to improve clarity, accuracy, policy effectiveness and consistency with the emerging Great Yarmouth Local Plan. Detailed summaries of the consultation response from the Borough Council together with the Parish Council's response and proposed changes to the Plan, are provided in the appendices to this Consultation Statement. The full text of the consultation response from Great Yarmouth Borough Council can also be found in the appendices.

Other statutory consultees provided technical advice and recommendations within their respective areas of responsibility. The main points raised by stakeholders and statutory consultees are summarised below.

Policy clarity and conformity:	**Great Yarmouth Borough Council** advised that the Neighbourhood Plan should be updated to reflect the advanced stage of the emerging Great Yarmouth Local Plan. Its response noted that the emerging Local Plan includes four allocations within the neighbourhood area, comprising minimum figures for land at

	Cromer Road, Barton Way, Yarmouth Road and Scratby Road, and that the emerging Local Plan is likely to be adopted before the Neighbourhood Plan reaches adoption. It therefore recommended that references to the Core Strategy and Local Plan Part 2 are replaced or updated as appropriate, and that the Plan period is reviewed to align with the emerging Local Plan period to 2042. Great Yarmouth Borough Council also identified a number of detailed drafting, mapping and terminology changes, including paragraph numbering, references to settlement categories, allocation references, Local Plan policy terminology and the Design Guidance and Codes. **Norfolk County Council** also commented on the wider policy context. It advised that the Plan should refer to the Norfolk Minerals and Waste Local Plan and noted that future changes to the National Planning Policy Framework may require paragraph references and policy wording to be checked before submission.
Housing, design and site allocation:	**Great Yarmouth Borough Council** made a number of comments on the housing and design sections, including the need to reflect the emerging Local Plan allocations and updated housing figures, and to review the relationship between the Neighbourhood Plan, the Housing Needs Assessment and the emerging Local Plan. It also recommended updates to the Design Guidance and Codes so that concept masterplans, allocation references and supporting text reflect the emerging Local Plan position. **Norfolk Constabulary** provided detailed advice on designing out crime and Secured by Design principles. It emphasised the importance of safe, secure and accessible places, including natural surveillance, lighting, defensible space, boundary treatments, safe movement routes, parking design and the avoidance of layouts that create hidden or poorly overlooked spaces.
Flood risk, drainage and water management:	Flood risk and drainage were key technical themes. **Norfolk County Council**, in its role as **Lead Local Flood Authority**, welcomed the references to surface water, sustainability and climate change, but advised that these references are limited in scope and should more clearly address flood risk from all sources, including fluvial, coastal and groundwater flooding. It recommended stronger references to Sustainable Drainage Systems, relevant guidance from the LLFA, the Environment Agency and Internal Drainage Boards, and mapping of flood risk across the neighbourhood area. The **Water Management Alliance**, responding on behalf of the **Broads Internal Drainage Board**, advised that the parish sits immediately adjacent to the Internal Drainage District and within the Board's watershed catchment. It recommended that the Plan refers to the relevant drainage and flood risk regulators, including Internal Drainage Boards, the Environment Agency and the Lead Local Flood Authority, and highlighted the need for drainage strategies, infiltration testing, SuDS discharge hierarchy considerations and, where relevant, land drainage consent.

Natural environment and biodiversity:	**Natural England** did not raise specific comments on the draft Neighbourhood Plan but signposted the Parish Council to its general advice on neighbourhood planning and the natural environment, including biodiversity, landscape, soils, protected species, priority habitats and environmental assessment. **Norfolk Wildlife Trust** supported the Plan's natural environment policies and recommended strengthening the approach to biodiversity net gain, ecological networks, wildlife corridors and habitat connectivity. It suggested that Policy 7 should include a clearer policy requirement for biodiversity net gain and that opportunities for nature restoration should align with the Norfolk Local Nature Recovery Strategy.
Local Green Space, views and landscape:	Comments were received on the Plan's approach to Local Green Space and important local views. **Norfolk Wildlife Trust** supported the designation of Local Green Spaces, while also suggesting that the policy should give clearer protection to sites designated for their nature value. **Norfolk County Council** as the **Lead Local Flood Authority** did not object to the proposed Local Green Spaces but advised that if any Local Green Space forms part of a SuDS or contributes to surface water management or land drainage, this should be appropriately evidenced in the submitted Plan. **Great Yarmouth Borough Council** made detailed comments on mapping, terminology and the relationship between Local Green Space references and more general amenity space references, to avoid confusion between designated Local Green Spaces and other green spaces shown in the Design Guidance and Codes.
Historic environment	**Historic England** welcomed the production of the Neighbourhood Plan and noted that the parish's historic environment features throughout the Vision, Objectives and Policies. It did not consider it necessary to be involved in the detailed development of the strategy at this stage but referred the Parish Council to Historic England's neighbourhood planning advice and recommended consultation with the local planning authority conservation officer and, where appropriate, the Norfolk Historic Environment Record. **Norfolk County Council** also provided comments on the historic environment, including comments on the treatment of below-ground archaeological remains and non-designated heritage assets.
Health, infrastructure and community safety:	**Norfolk County Council Public Health** did not raise detailed comments on the Plan but referred the Parish Council to the Health in Neighbourhood Plans guidance as a source of support for embedding health considerations in neighbourhood plans. N**orfolk Fire and Rescue Service** advised that new development can affect fire and rescue demand and response requirements. It recommended references to developer contributions for fire service provision where the relevant legal tests are met, fire hydrant provision, fire appliance access, refuse and recycling storage, domestic sprinkler expectations where access distances are

	exceeded, and the safe installation of solar panels, domestic energy storage systems and electric vehicle charging points.
Transport and highway matters	**National Highways** confirmed that the draft Neighbourhood Plan is unlikely to have a severe impact on the operation of the trunk road network and therefore offered no comment. It noted that any impacts on the Strategic Road Network would be considered through future planning applications where relevant **Norfolk County Council**, as the Highway Authority, advised that highway land and roadside verges should not normally be included within Local Green Space designations, as this could affect future highway maintenance, transport schemes or active travel measures. **Great Yarmouth Borough Council** commented on the wording of the visitor parking and walking and cycling policies, including the need for requirements to be proportionate and achievable in the context of the existing settlement pattern. **Norfolk Constabulary** provided advice on parking design, cycle storage, footpath/permeability issues and natural surveillance as part of its wider Secured by Design comments. **Norfolk Fire and Rescue Service** also highlighted the need for fire appliance access to be considered in relation to new development and visitor parking.

A full schedule of responses and proposed changes is provided in the appendices to this Consultation Statement.

Appendix A: List of statutory consultees

Active Norfolk
Active Travel England
Anglian Water
Broads Authority
Broads Authority
Cadent Gas
Caister-on-Sea Parish Council
Civil Aviation Authority
Environment Agency
Essex and Suffolk Water
Essex and Suffolk Water
Filby Parish Council
Great Yarmouth Borough Council
Hemsby Parish Council
Historic England
Homes England
Lead Local Flood Authority - Norfolk County Council
Local Historic Environment Services – Norfolk County Council
Marine Management Organisation
Martham Parish Council
National Gas
National Grid
National Highways Agency
Natural England
Network Rail
NHS - James Paget University Hospital
NHS Norfolk and Waveney Integrated Care Board and Care System
Norfolk and Suffolk NHS Foundation Trust
Norfolk Biodiversity Information Service
Norfolk County Council (and associated teams)
Norfolk Wildlife Trust
Public Health - Norfolk County Council
Rollesby Parish Council
RSPB
Water Management Alliance
Woodland Trust

Appendix B: Summary of responses from statutory and stakeholder consultation

Consultee	Issue / Comment	Response	Detail
Great Yarmouth Borough Council	Details in Appendix C	Details in Appendix C	Details in Appendix C
Anglian Water	Broadly supportive of the approach taken and noted its ongoing involvement in preparation of the emerging Great Yarmouth Local Plan, including support for drainage strategy requirements relating to site allocations. Comments provided in relation to water efficiency, sustainable drainage and infrastructure considerations. Support expressed for the inclusion of SuDS within Policy 4: Visitor Parking. Anglian Water also confirmed that it had no objection to the proposed Local Green Space designations, noting that the policy would not restrict its ability to maintain and repair underground assets.	Agreed – policy wording and supporting text amended	Policy 3 criteria amended to strengthen references to water efficiency alongside wider sustainable design measures. Additional supporting text included encouraging the incorporation of water efficiency measures within new development where appropriate. The Neighbourhood Plan already supports sustainable drainage measures, and no objection was raised to the proposed Local Green Space designations.
Historic England	Welcomes the preparation of the Neighbourhood Plan and the way in which the parish's historic environment is reflected throughout the vision, objectives and policies. Historic England confirmed that it did not consider it necessary to be	Noted	No change identified at this stage.

	involved in the detailed development of the strategy at this stage and referred the Parish Council to its guidance on incorporating historic environment considerations into neighbourhood plans.		
National Highways	National Highways reviewed the draft Neighbourhood Plan and confirmed that the details set out in the document are unlikely to have a severe impact on the operation of the trunk road network. It therefore offered no comment. National Highways also noted that it may be a statutory consultee on relevant future planning applications and would assess any impacts on the Strategic Road Network at that stage	Noted	No change identified at this stage.
Natural England	No specific comments on the draft Plan. Refers the Parish Council to its standard guidance relating to neighbourhood planning and the natural environment, including biodiversity, landscape character, protected habitats and species, green infrastructure and environmental assessment considerations.	Noted	No change identified at this stage.

Norfolk County Council	Welcomes the preparation of the Neighbourhood Plan and provided comments across a range of topics including the historic environment, flood risk and drainage, minerals and waste safeguarding, Local Green Space designations, active travel and policy wording. Comments were also provided by specialist teams including Historic Environment Services and the Lead Local Flood Authority. The response recommended stronger reference to archaeological considerations, groundwater and surface water flood risk, drainage matters and updated strategic policy references. Comments were also made on specific policies, including flood risk and SuDS references, fire and rescue requirements, and the treatment of highway land within proposed Local Green Space boundaries.	Agreed in part - amendments made where appropriate.	Plan reviewed and amended where appropriate in response to the comments received. Amendments include updated supporting text relating to flood risk and drainage considerations, revisions to policy wording for clarity and consistency with national and strategic policy, and updates to references to the emerging Great Yarmouth Local Plan where appropriate. Some comments were noted where no further changes were considered necessary or where matters are addressed through existing Development Plan policies or separate regulatory processes. Local green space boundaries reviewed and amended where appropriate.
Norfolk Constabulary	Norfolk Constabulary provided a supportive response to the Neighbourhood Plan and welcomed the emphasis placed on design and place-making. The response highlighted the importance of incorporating crime prevention and	Agreed - policy wording and supporting text amended.	Policy 3: Design updated to include an additional criterion supporting proportionate measures to promote community safety and reduce opportunities for crime and anti-social behaviour through design. Supporting text added confirming

	community safety principles into the design of new development, including natural surveillance, active frontages, clear sightlines and well-overlooked public spaces. Reference was also made to the Secured by Design initiative and wider national planning policy relating to safe and inclusive places.		support for the principles of Secured by Design and encouraging applicants to consider crime prevention through good design from the outset.
Norfolk Wildlife Trust	Norfolk Wildlife Trust supported the overall direction of the Neighbourhood Plan and provided comments relating to biodiversity, habitat connectivity, green infrastructure, sustainable drainage, climate resilience, coastal erosion and active travel. Suggestions included stronger references to biodiversity enhancement, native planting, green infrastructure within walking and cycling routes, ecological connectivity and sustainable design measures.	Noted and agreed in part – policy wording amended and supporting text updated.	Policies relating to design, walking and cycling, green infrastructure and biodiversity have been updated where appropriate to strengthen references to habitat connectivity, biodiversity enhancement, native planting and green infrastructure. Supporting text relating to coastal erosion and climate resilience has also been updated to reflect the current strategic policy framework. More detailed technical requirements and additional standalone policies were not considered necessary as these matters are addressed through national legislation and strategic Development Plan policies.
Public Health – Norfolk County Council	Public Health provided a general response signposting the Parish Council to the “Health in Neighbourhood Plans” guidance document, which includes examples of	Noted	No change identified at this stage.

	good practice for embedding health and wellbeing considerations within neighbourhood plans.		
Water Management Alliance / Internal Drainage Board	The Water Management Alliance provided comments relating to flood risk, drainage infrastructure, sustainable drainage systems, discharge hierarchies and the role of Internal Drainage Boards in the planning and consenting process. The response encouraged early consideration of drainage matters and engagement with relevant drainage authorities where development proposals may affect drainage infrastructure or watercourses.	Agreed – supporting text amended.	Additional supporting text included in the design section of the Neighbourhood Plan to encourage early consideration of flood risk and drainage matters, including engagement with relevant drainage and flood risk bodies where appropriate. The Neighbourhood Plan already supports the incorporation of sustainable drainage measures within new development.

Appendix C: Detailed Consultee Responses (GYBC)

Issue / Comment	Response	Detail
The Neighbourhood Plan period should be amended from 2041 to 2042 to align with the proposed modified plan period of the emerging Local Plan	Agreed. Amended	Plan date updated to 2042.
Identified a broken or incorrect source link in footnote 1.	Noted. Updated	Link updated
Paragraph 1.3 should be updated to reflect the status of the emerging Local Plan, and references to “primary villages” and “secondary villages” should be replaced with the terminology used in emerging Policy RUR1, including “larger village” and “smaller village”. GYBC also noted that the emerging allocations should be described as minimum figures rather than approximate figures.	Agreed. Updated.	Paragraph 1.3/1.4 updated to reflect the emerging Local Plan position, including the revised settlement hierarchy terminology and the use of minimum dwelling figures for allocations.
Several minor drafting improvements in the introduction, including references to Scratby and California being located along the coastline, improvements to readability and grammar, and correction of references to National Landscapes	Noted. Amended.	Introduction reviewed/amended to improve accuracy, readability and consistency with terminology. References to Areas of Outstanding Natural Beauty have been removed.
Paragraphs 1.18, 2.2, 2.4 and 2.5 should be updated to reflect the status of the emerging Local Plan before Regulation 15 submission.	Noted. Updated.	Policy context sections have been reviewed and updated to reflect the emerging Local Plan position. (note now paragraphs 1.19, 2.4, 2.5-2.7)
GYBC identified minor formatting issues in paragraphs 2.2 and 2.3 and a missing bullet point in paragraph 3.3.	Noted. Amended.	Formatting, paragraph spacing and bullet points have been reviewed and corrected.

Paragraph 4.1 refers to a Vision for 2036, which does not align with the Neighbourhood Plan period.	Agreed. Amended.	The Vision has been updated to align with the revised Neighbourhood Plan period to 2042.
GYBC advised that housing completions before the Neighbourhood Plan base date have limited relevance, and that the 189 homes at Pointers East relate to completions recorded in Caister, rather than Ormesby St Margaret.	Agreed. Amended.	Completions information has been reviewed and earlier references removed where necessary.
Paragraph 5.2 refers to 92 net windfall commitments, but GYBC advised that further windfall development is likely to come forward during the plan period and that the wording may be misleading.	Noted. Amended.	The specific windfall reference has been amended to avoid implying that this represents the total likely windfall development over the plan period.
Paragraphs 5.3, 5.4, 5.5, 5.9, 5.11 and 5.17 should be updated to reflect the emerging Local Plan, including Policy OSS1 and the use of “minimum” rather than “approximately” for allocation figures.	Agreed. Updated.	The housing growth section has been reviewed and updated to reflect the emerging Local Plan spatial strategy and the revised wording for allocations.
GYBC advise that emerging Policy HOU1 requires 25% affordable housing on qualifying sites, and that the affordable housing tenure split has been modified to use 60% affordable housing for rent and 40% affordable home ownership as a starting point.	Noted. Amended.	References to affordable housing requirements updated to reflect the emerging Local Plan position.
Paragraph 5.8 wrongly refers to the land allocated by SCR1 as being under construction. The development under construction relates to permission 06/22/0546/F for 41 dwellings immediately to the north.	Noted. Amended.	The relevant paragraph has been corrected to distinguish the emerging allocation from the separate development under construction.
Paragraph 5.11 refers to the adopted and emerging strategic gap between Caister-on-Sea and Ormesby St Margaret but omits the	Agreed. Updated.	Text amended to refer to the additional proposed strategic gaps.

proposed gaps between Hemsby and Scratby and Caister-on-Sea and California.		
GYBC advised that house price information from over three years ago should be updated where possible, and that wording should distinguish between the Neighbourhood Plan and the Housing Needs Assessment.	Agreed. Updated and amended.	Paragraph 5.17 house price and housing evidence text reviewed and updated for clarity and accuracy.
GYBC raised concerns about Policy 1: Affordable Housing, noting that emerging Local Plan Policy HOU1 removes specific reference to First Homes, reflecting changes to the NPPF removing the First Homes requirement.	Agreed. Policy deleted.	The affordable housing policy has been reviewed and the policy approach amended so that the Neighbourhood Plan does not introduce a separate First Homes requirement.
Policy 2 - should delete the reference to the 2022 Housing Needs Assessment as acceptable evidence, as the Plan covers a longer period and evidence will need to remain up to date. Concerns that the requirement for at least 90% of homes to have three bedrooms or fewer applies too rigidly to all schemes, including very small developments.	Agreed. Policy wording updated. *[note this becomes Policy 1 due to renumbering]*	Reference to the 2022 Housing Needs Assessment removed. The policy now refers more generally to the most up-to-date and proportionate evidence. Policy wording amended to provide a more proportionate approach. The policy now supports a predominance of smaller homes where justified, while allowing for alternative mixes where up-to-date evidence, viability or site-specific circumstances indicate that a different approach is appropriate.
The design section should reflect the emerging Local Plan and that the Great Yarmouth Design Code will form part of the emerging Local Plan rather than being a separate SPD.	Noted. Wording updated.	Supporting text amended to clarify the relationship between the Neighbourhood Plan, the emerging Local Plan Design Code and the Ormesby St Margaret with Scratby Design Guidance and Codes.
Policy 3 - various comments including the need to refer to the Local Plan Design Code and general design codes, correct the appendix reference for the Design Checklist, avoid overly prescriptive density and height requirements,	Noted. Policy wording updated. *[note this becomes Policy 2 due to renumbering]*	Policy wording amended to require development to respond positively to the relevant character area and to have regard to the Ormesby St Margaret with Scratby Design Guidance and Codes and Design Checklist. Prescriptive

correct typographical errors and clarify the wording on energy efficiency and carbon emissions.		wording on density and height has been replaced with wording focused on local character/form and height. Criterion wording sharpened to require sustainable design measures to improve energy efficiency, reduce carbon emissions and support climate resilience, having regard to relevant principles in the Design Guidance and Codes.
Paragraph 7.3 - Update the “Natural England Coast Path” to “King Charles III England Coast Path”.	Agreed. Updated.	Wording updated.
Paragraph 7.8 - references to “Holiday Accommodation Areas” should be updated to align with emerging Policy TCL1 terminology, which refers to “Existing Holiday Parks”.	Noted. Updated.	Wording amended.
GYBC advise that Figure 7 should be updated to reflect the extent of Existing Holiday Parks under emerging Policy TCL1 and the current Coastal Change Management Area under emerging Policy CLC1.	Agreed. Map updated.	Map updated to reflect updated extent under TCL1.
Policy 4 – various comments including the need to cross-refer to coastal change policy where proposals are within the Coastal Change Management Area or within 30 metres inland of it, avoid ambiguous wording about “driving through a village”, and refer to species impact avoidance mitigation and recreational disturbance.	Noted. Policy wording and supporting text amended. *[note this becomes Policy 3 due to renumbering]*	Policy wording amended to require safe and suitable access and to avoid severe cumulative impacts on the local transport network. The policy has also been amended to refer to the Coastal Change Management Area and the need to demonstrate compliance with relevant coastal change policies where applicable. Supporting text has been added to refer to avoidance and mitigation of adverse impacts on environmental assets, including recreational disturbance where relevant.

Paragraphs 8.2 and 8.9 should be updated to reflect the emerging Local Plan. GYBC also advised that Policy RTC4 is the relevant emerging policy for paragraph 8.2.	Agreed. Amended.	Wording reviewed and updated to reflect the emerging Local Plan policy framework.
Policy 5 - should be simplified/made more proportionate. Recommended that requirements for walking and cycling connectivity should reflect the scale and location of the proposal, and that protection for identified community facilities should be linked to the relevant Great Yarmouth Local Plan policy or any successor policy. Figure 8 unclear and appears to include a broad range of retail, commercial, tourism and holiday park uses which would not normally be treated as community facilities.	Noted. Policy wording reviewed and updated. Map reviewed and amended. *[note this becomes Policy 4 due to renumbering]*	Policy wording amended to take a more proportionate approach to pedestrian and cycle connectivity, reflecting the scale and location of development proposals. The policy has also been revised to cross-refer to relevant Development Plan policies on the protection of community facilities. Figure 8 reviewed. Uses that are not properly regarded as community facilities have been removed or reclassified as appropriate. An accompanying list of identified community facilities has been added to improve clarity and consistency in decision-making.
Policy 6 - should be amended so that requirements to improve or extend footways and protect/incorporate Public Rights of Way apply "where applicable".	Agreed. Policy wording amended. *[note this becomes Policy 5 due to renumbering]*	Policy wording amended to clarify that such requirements apply where relevant to the proposal and its site context.
Paragrap**h** 10.4 - Green Infrastructure section should clarify that a Habitats Regulations Assessment is an assessment process, not a mitigation measure.	Noted. Amended.	Supporting text amended.
Paragraph 10.7/10.8 - Biodiversity Net Gain text should clarify the preference for on-site delivery, with off-site delivery and statutory credits used only where necessary. Text should refer to emerging Local Plan Policy NAT3, including the 20% BNG requirement for certain major	Noted. Wording updated.	Supporting text has been amended to explain the delivery hierarchy and to refer to emerging Local Plan Policy NAT3.

development unless viability evidence demonstrates otherwise.		
Paragraph 10.12 - cross-refer to Local Plan Design Code requirement PS5 and GB03 of the Neighbourhood Plan Design Guidance and Codes.	Noted. Added.	Cross reference added.
Policy 7 - requirement for soft boundaries should be refined, as close-boarded fencing may be acceptable in some rear or side curtilage situations but should generally be avoided where visible from the public realm or adjoining open countryside.	Noted. Policy wording amended. *[note this becomes Policy 6 due to renumbering]*	Policy wording amended to prioritise soft landscaping, hedgerows and planting for boundary treatments visible from the public realm or adjoining open countryside, while avoiding absolute wording.
GYBC consider that the proposed Local Green Space designations are likely to meet the national policy criteria. They request that the Parish Council contact GYBC regarding Council-owned Local Green Space.	Noted.	The Parish Council will contact the relevant GYBC property enquiries team where required.
Local Green Space – typo/error noted on LGS11 allotments. Should read Cromer Road not Yarmouth Road. In Policy 7 and on maps below.	Noted. Corrected.	Local Green Space description and maps have been checked and corrected.
Figures 11–18 would be clearer if excluded buildings were cut out of the Local Green Space boundary rather than shown as overlapping excluded layers.	Agreed. Amended	Maps reviewed and amended so excluded buildings are removed from the Local Green Space boundary where practicable.
GYBC advise that the proposed important local views appear to be generally appropriate**.**	Noted.	No change required.
GYBC advise that the coastal erosion policy duplicates emerging Local Plan Policy CLC5 and that some criteria are not effective planning tests, particularly those relating to conformity with other policies and landowner willingness. It also advised that the CCMA maps and coastal	Agreed. Policy deleted. Test reviewed and updated.	Policy 10 has been deleted. The coastal erosion supporting text has been reviewed, reduced and updated because coastal change remains an important local issue for the community. The Plan will rely on relevant Development Plan policies to address coastal adaptation and

erosion evidence should be updated to reflect the emerging Policies Map, NCERM2 data and the Shoreline Management Plan.		rollback development. Superseded references have been removed.
Paragraphs 12.5 and 12.12 should be updated to reflect the emerging Local Plan.	Agreed. Updated.	Text amended.
Policy 12 – concerns that the NDHA policy is more restrictive than national policy and does not clearly apply the required balanced judgement where harm or loss is identified.	Agreed. Policy wording amended. *[note this becomes Policy 10 due to renumbering]*	Policy amended to identify the relevant non-designated heritage assets and require proposals affecting them, or their setting, to have regard to their significance. The policy now refers to the effect of proposals being considered in accordance with national policy.
Detailed comments were provided on the Design Guidance and Codes, including references to the emerging Great Yarmouth Local Plan, allocation references, population data, mapping, terminology, SuDS guidance, typographical errors, accessibility standards, character area terminology, parking arrangements and concept masterplans. GYBC advised that some references may become outdated once the emerging Local Plan is adopted, and that care should be taken to avoid confusion between the Design Guidance and Codes and the statutory development plan.	Noted. Supporting text amended to clarify the status of the Design Code and to explain how it should be used in preparing and assessing proposals	The Design Guidance and Codes was prepared as a separate supporting guidance document and is not being amended as part of the Regulation 15 submission. Supporting text within the Neighbourhood Plan has instead been amended to make clear that the Design Guidance and Codes is supporting guidance to be read alongside the Neighbourhood Plan and the wider Development Plan, while also having regard to the most up-to-date Local Plan policies and guidance.
Design code comment on parking advised that parking diagrams should not imply front-of-plot parking is the default approach. Parking design should be context-specific, well landscaped and subordinate to overall design quality, with larger schemes considering a wider range of design-led parking solutions.	Agreed. Policy wording amended.	Policy wording amended to require parking to be context-specific, integrated with the layout and character of development, and designed to minimise visual impact on the streetscape. Additional wording added to encourage landscaping and ensure parking remains subordinate to overall design quality

Appendix D: Stakeholder email

Dear Consultee,

Ormesby St Margaret with Scratby Parish Council is undertaking Regulation 14 Consultation on the Pre-Submission Draft of the Neighbourhood Plan.

The consultation runs from 30th March 2026 to 10th May 2026.

The Neighbourhood Plan sets out planning policies to guide development in the parish up to 2041. The Parish Council is seeking your views on the draft plan and supporting evidence.

The Neighbourhood Plan and supporting documents are available on the Parish Council website: https://ormesbypc.norfolkparishes.gov.uk

How to respond

Comments should be submitted by 17.00 on 10th May 2026.

Responses can be emailed to clerk@ormesbyscratby-pc.gov.uk

All responses received during the consultation period will be considered by the Parish Council and used to inform the final version of the Neighbourhood Plan.

Should you have any questions about the consultation, please contact the parish clerk on this email clerk@ormesbyscratby-pc.gov.uk

Yours faithfully,

Ormesby St Margaret with Scratby Parish Council

Tel: 07825 266117

Email: clerk@ormesbyscratby-pc.gov.uk

Website: Ormesby St Margaret with Scratby Parish Council – A Norfolk Parishes site

Correspondence address: The Village Centre, Station Road, Ormesby St Margaret, NR29 3PU.

Appendix E: Letter to NDHA owners

Dear [Landowner Name],

Re: Proposed Identification of Your Building / Site as a Non-Designated Heritage Asset in the Ormesby St Margaret with Scratby Neighbourhood Plan

A Neighbourhood Plan is currently being prepared for Ormesby St Margaret with Scratby. As part of this process, your property, known as "[ASSET NAME]", has been identified as being of local historic or architectural interest and is being considered for inclusion in the Plan as a Non-Designated Heritage Asset (NDHA).

We are writing to inform you of this proposal and to invite your feedback before the draft Plan is published for formal consultation.

Non-Designated Heritage Assets are buildings, structures, or sites that have been identified as making a positive contribution to the local character and sense of place, but which are not formally listed or scheduled. They are recognised through the planning system as having local heritage significance.

Inclusion as an NDHA does not place any additional ownership, maintenance, or access responsibilities on you. It simply means that if a planning application is submitted in the future that affects the asset, the local planning authority must take its heritage significance into account when determining the application.

The draft Neighbourhood Plan includes a policy to ensure that proposals affecting locally significant heritage assets are managed sensitively, in a way that preserves or enhances their identified character and contribution to the wider area. This approach follows national planning guidance and reflects Great Yarmouth Borough Council's own heritage policies.

Your property has been identified based on the findings of the Ormesby St Margaret with Scratby Non-Designated Heritage Asset Assessment, which considered factors such as historic interest, architectural merit, age, rarity, and contribution to local distinctiveness.

The formal Regulation 14 consultation on the draft Neighbourhood Plan will begin in early 2026 and will run for at least six weeks. This will be the first opportunity to make formal representations, and we will contact you again at that stage.

In the meantime, we would very much welcome your comments on the proposed identification of your property as a Non-Designated Heritage Asset. Your feedback will help ensure the draft Plan reflects local priorities and landowner perspectives before it is published for consultation.

If you would like to comment or ask questions, please contact us via email at: [email address]

Yours sincerely,
[Name]
on behalf of the Ormesby St Margaret with Scratby Neighbourhood Plan Steering Group

Appendix F: Letter to Local Green Space land owners

Dear [Landowner Name],

Re: Proposed Local Green Space Designation. Ormesby St Margaret with Scratby Neighbourhood Plan

Ormesby-with-Scratby Parish Council is preparing a Neighbourhood Plan for the parish. As part of this work, your land has been identified as a proposed Local Green Space.

We are writing to inform you that the draft Neighbourhood Plan is now subject to Regulation 14 consultation and to invite your comments on the proposed designation.

The consultation runs from:

30 March 2026 to 10 May 2026

Local Green Spaces are areas identified by the community as being particularly important to the character of the parish. This may be due to recreational value, landscape quality, tranquillity, historic interest, or wildlife value. Designation is intended to provide long term protection for these valued spaces.

It is important to note that Local Green Space designation:

- Does not create new public access rights
- Does not change land ownership
- Does not place additional management or maintenance responsibilities on landowners

The purpose of designation is to recognise locally valued green spaces and ensure that development proposals affecting them are carefully considered.

Your land has been identified following community engagement and assessment against national planning policy criteria.

The draft Neighbourhood Plan and supporting evidence, including details of proposed Local Green Spaces, are available to view at:

https://ormesbypc.norfolkparishes.gov.uk

How to respond

Comments should be submitted by 5pm on 10 May 2026.

Responses can be sent to:

Email: clerk@ormesbyscratby-pc.gov.uk

Please include:

• Your name
• Land or Local Green Space reference
• Your comments or any concerns

All representations received during the consultation period will be considered and used to inform the final version of the Neighbourhood Plan.

If you have any questions about the proposed designation or the consultation process, please contact the Parish Clerk using the details above.

Yours sincerely

Ormesby-with-Scratby Parish Council

Appendix G: Full text of the response from Great Yarmouth Borough Council to the consultation

Ormesby St Margaret with Scratby Parish
Council (By email only)

8th May 2026

Dear Parish Council,

Draft Ormesby St Margaret Neighbourhood Plan Review – Great Yarmouth Borough Council response to Regulation 14 (pre-submission) consultation

Thank you for consulting the Borough Council on your draft (Regulation 14) neighbourhood plan. Comments on the plan are provided below.

It should be noted that the Borough Council submitted its final draft Local Plan (the emerging Local Plan hereafter) for examination by independent planning inspectors on 24th February 2025. This contains four allocations within the neighbourhood plan area or a minimum of 379 dwellings. The allocations include a minimum of; 200 dwellings at Land at Cromer Road, 32 dwellings at land at Barton way, 125 dwellings at Land at Yarmouth Road and 22 dwellings at Land at Scratby Road.

There are also new and revised Strategic Policies which the Neighbourhood Plan will need to be in general conformity with.

Following the examination hearing sessions held between October and November 2025, and the Inspectors' subsequent post-hearing letter, the Inspectors have confirmed that the emerging Great Yarmouth Local Plan is capable of being found sound, subject to the proposed Main Modifications. The Plan is now at an advanced stage and the consultation on the modifications ended on 22 April 2026. Given this progress, it is highly likely that the emerging Local Plan will be adopted before the Ormesby St Margaret Neighbourhood Plan reaches adoption. It is therefore recommended that the Neighbourhood Plan is updated to reflect the emerging Local Plan, with references to the Core Strategy and Local Plan Part 2 replaced by the relevant policies within the new Plan. A list of the policies that will be superseded upon adoption is provided in Appendix 9 of the emerging Local Plan. The Borough Council will notify Ormesby St Margaret Parish Council upon receipt of the Inspectors' final report and again upon formal adoption of the Local Plan. In the interim, a track change

document of proposed Main Modifications can be viewed via the Borough Council's website here:

- Document_I6_-_Tracked_Changes_Local_Plan_incorporating_proposed_modifications.pdf

Where relevant, this response highlights specific paragraphs and policies where such amendments could be made; however, this list is not exhaustive, and a comprehensive review

of the Plan is required in this regard.

General

There is an error with the numbering of paragraphs throughout the neighbourhood Plan. For example, the numbering goes from 5.19 on page 15, and then back to 5.16 on page 16. There are also paragraph numbering issues within the Coastal erosion section of the plan, for example on page

51. The numbering throughout the document should be checked and renumbered where relevant.

It is noted that the Neighbourhood Plan period runs until 2041 which corresponds with the original plan period for the Emerging Local Plan. Following the Emerging Local Plan examination hearings, a
modification (MM1 within the Schedule of Proposed Main Modifications) is proposed to change the Plan period from 2041 to 2042 to ensure the plan covers a period of at least 15 years. The Neighbourhood Plan should cover the same period to 2042, given that the regulation 14 consultation and submission are likely to occur within 2026/27, meaning the minimum 15-year period would result in a plan period to 2041/42.

Introduction

Page 4 – footnote 1 – The link to the source data does not appear to work as intended.

Paragraph 1.3 – As noted above, this paragraph should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission.

Note that a Main Modification has been proposed to Policies ORM1 (MM129), ORM2 (MM130), ORM3 (MM131) and SCR1 (MM149) for the development quanta to be expressed as a 'minimum' rather than an 'approximate' figure for the allocations.

The paragraph also references 'primary villages' and 'secondary villages' which are categorised by Core Strategy Policy CS2. Note that the emerging Local Plan does not use the term 'primary villages' or 'secondary villages', rather Policy RUR1 identifies Ormesby St Margaret as a 'larger village' and expects that development within rural areas will be focussed within larger villages. In terms of Scratby, this is defined as a 'smaller village' where smaller scale housing growth is expected. Policy RUR1 states that "*Elsewhere in the rural area, in the countryside, small-scale development will come through as windfall developments in accordance with Policies RUR2, RUR3 and RUR4 and sites allocated through Neighbourhood Plans*". Reference should be updated accordingly prior to submission.

Paragraph 1.6 – It is suggested that the paragraph is amended to state 'Scratby and California are located along the coastline' for clarity. The last sentence within the paragraph should be reworded to improve readability.

Paragraph 1.12 – The first sentence should be amended and, where relevant, grammar included to improve the readability.

Paragraph 1.13 – Areas of Outstanding Natural Beauty were redesignated as 'National Landscape Areas' in 2023. Scratby and California are outside of the area designated as National Landscapes, with only a small section of the Norfolk Coast National Landscape Area

being within the Borough, which is located within Winterton and Somerton.

Paragraph 1.15 – This paragraph seems to comprise of draft notes and should either read like a descriptive paragraph or formatted bulleted list.

Paragraph 1.18 - As noted above, this paragraph should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission

Neighbourhood Planning

Paragraph 2.2, 2.4 and 2.5 – As noted above, these paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission.

Paragraph 2.2 and 2.3 - Check Paragraph spacing

Consultation and Engagement

Paragraph 3.3- The last point is missing the Bullet Point.

Vision and aims

Paragraph 4.1 – Sets out the vision for 2036, however, the plan period is until 2041 (notwithstanding above comments). This should be updated to reflect the neighbourhood plan period.

Housing Growth

The Information within this section is supported by a Housing Needs Assessment that has been complied by AECOM (2022). However this does not appear to be published. Due to this we have been unable to review this or provide comments. It is suggested that this is forwarded to us prior to Regulation 15 submission to enable us to review and make comments, and for any amendments to be incorporated prior to the consultation. Throughout the draft Neighbourhood Plan it is stated that the report was compiled in 2022. Due to the time that has passed since, it may require an update or an addendum to ensure the information contained within remains up to date and relevant.

The evidence base supporting this section for housing completions is particularly aged. For information the borough council has recorded the following completions within the parish since 2020-21:

	Ormesby St Margaret	Scratby
2021-22	2	3
2022-23	1	1
2023-24	0	2
2024-25	10	2
2025-26	9	1

Paragraph 5.1 - if the base date of the NP starts in 2022 and will conform with the current Local Plan when adopted then referencing completions prior to 2022 has no material relevance. If it is intended to keep this information in for context, it should be stated that the 189 homes delivered at Pointers East relates to completions recorded in Caister, rather than Ormesby St

Margaret.

Paragraph 5.2 – The wording of this paragraph is misleading. Whilst there may have been 92 net commitments as of 2024/25 from identified from windfall development, it is highly likely that other windfall developments will come forward within the neighbourhood area. The Local Plan anticipates 19 dwellings per annum to be developed in the rural area to 2042 (some of which will occur within the area). The wording should therefore be revised to make clear that the 92 dwellings comprise the identified windfall commitment at a specific point in time (with further windfall development likely to be delivered during the plan period), or to omit reference to a specific windfall number entirely.

Paragraph 5.3, 5.4, 5.5, 5.9, 5.11, 5.17 – As noted above, these paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission, specifically taking into account the emerging spatial strategy (Policy OSS1) and that emerging allocations are expressed as "minimums" not "approximately".

Paragraphs 5.4 - As noted elsewhere, emerging LP Policy HOU1 would require 25% of dwellings to be delivered as affordable housing on qualifying sites.

Paragraph 5.6 – It is suggested that the paragraph is reworded to improve readability**.**

Paragraph 5.7 – To improve grammar and the readability, it is suggested that there should be a comma after '*As well as this'* and rewording of the last sentence of the paragraph to read '*No planning application has been at submitted at time of writing this plan'.* Also, note that as per Main Modification to the emerging GYLP, this should be reworded as '*allocated for a minimum of 125 residential dwellings'*.

Paragraph 5.8 – Note that the land allocated by SCR1 does not have planning permission and is not yet under construction as noted by the paragraph. The development under construction relates to planning permission 06/22/0546/F for 41 dwellings immediately to the north.

Paragraph 5.11 - The plan references the adopted and emerging strategic gap between Caister-on-Sea and Ormesby St Margaret but omits to reference the proposed gaps between Hemsby and Scratby and Caister-on-Sea and California, both of which partially fall within the parish area. It should be noted that as part of the proposed Main Modifications to the emerging Local Plan, the Borough Council has mapped the extent of these gaps, with the indicative boundaries proposed for inclusion within the supporting text of Policy NAT8.

Paragraph 5.17 – The information regarding the current house pricing is from over 3 years ago, this should be updated to reference current circumstances, where data is available. Additionally, the report states **"***At the time of writing this report (Jan 23) house prices were seen to be dropping*." The phrasing of this sentence should be revised to reflect that the emerging NP is a plan rather than report or make clear that the HNA is being referred to.

Second Paragraph 5.16 (on page 16) - It would be advisable to update this paragraph depending on the stage of the Local Plan at the time of submission of the Neighbourhood Plan. A Main Modification has been proposed to Policy HOU1 to amend the tenure split of affordable housing, requiring as a starting point in the affordable housing requirement, 60% affordable housing for rent and 40% affordable home ownership.

Paragraph 5.20 – As noted, the targets and calculations within this paragraph are based on the

policies within the Local Plan Part 2. The Emerging Local Plan proposes to increase the quantum of affordable housing from 20% to 25%, unless policies within the Local Plan indicate otherwise. It would be advisable to update this paragraph depending on the stage of the Local Plan at the time of submission of the Neighbourhood Plan.

Policy 1: Affordable Housing – Without having reviewed the Housing Needs Assessment, it is not possible to comment on whether the proposed tenure split is justified. As noted above in relation to paragraph 5.16, emerging Local Plan Policy HOU1 is proposed to be modified to remove specific reference to First Homes. This reflects the revised National Planning Policy Framework, which confirms (at footnote 31) that the national requirement to deliver a minimum of 25% of affordable housing as First Homes no longer applies.

While the delivery of First Homes may continue where local planning authorities judge that they meet local need, any policy requirement for First Homes must be justified by robust and up to date evidence of a specific local need. The proposed modification to Policy HOU1 seeks to provide greater flexibility to deliver across the full range of affordable home ownership products (which could include First Homes) in response to identified needs.

Any departure from this approach within the Neighbourhood Plan would therefore need to be clearly justified by evidence demonstrating a local need for First Homes specifically within the parish.

Paragraph 5.22 – Should the HNA cover the period to 2036 the evidence base may need updating to reflect the extent of the plan period.

Paragraph 5.24 – the last two sentences of this paragraph are awkwardly worded and difficult to read, with multiple comparisons being made within a single sentence. You may wish to consider re-phrasing to improve clarity and ensure the key differences are clearly expressed.

Footnote 8 - the link to the source data does not appear to work as intended.

Paragraph 5.28 – Typographical error - "*However, the policy approach still wishes to aim for at least 90% of homes as three bedrooms or fewer **due to it is suggested** that there is a need for smaller/mid-sized homes in the parish which can suit families*"

Policy 2 – The first line within the policy sets out that proposals will need to reflect local housing need using the most up to date and proportionate evidence. However, the second line contradicts this by setting out that the Housing Need Assessment 2022 would be acceptable evidence. While this may be the case now, the Neighbourhood Plan covers the period until 2041 and therefore would not be considered to be based on up-to-date evidence. Therefore, the second line of the policy should be deleted.

Secondly, the requirement that at least 90% of homes should be three bedrooms or fewer applies uniformly to all residential development, regardless of scale. As drafted, this would apply equally to very small schemes, including developments of fewer than five dwellings. This is considered to be unreasonable and potentially unobtainable, particularly for small sites where achieving such a prescriptive housing mix may not be practical, viable or reflective of delivery realities. In the absence of sight of the underlying Housing Needs Assessment, it is unclear whether the evidence supports such a rigid requirement being applied at all scales of development.

Design of new Development

Paragraph 6.5 – As noted above, these paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission. Note that the Great Yarmouth Design Code would form part of the emerging Local Plan (Appendix 1), rather than a separate document (SPD).

Paragraph 6.8 – Typographical error - "*Many of the roads and streets in this character area have organic layouts **which** mature planting, low boundary treatments such as open grass area*"

Policy 3: Design –To avoid confusion, the first paragraph of the policy should be amended to "consistent with the **Local Plan** Design Code and general design codes…"

The Policy states that the Design Checklist is located within appendix B of the Neighbourhood Plan, However The Checklist is Located at Appendix A. Wording of this section of the policy should be amended to improve readability as it suggests that the Design Guidance and Codes and the Checklist are all located within the appendix to this document.

Criterion 'a' – "*Density in new residential developments should take into consideration the low to medium density ranges of the relevant character area as set out in The Design Codes*" – While it is reasonable for the policy to reference indicative density ranges informed by local character areas, it is not clear where within the Design Guidance and Codes document these "low to medium" density ranges are defined or evidenced. The absence of clearly identifiable density parameters reduces the effectiveness of the criterion in guiding development management decisions. Furthermore, it is

unclear why development should be limited to "low to medium" density ranges, particularly where the Design Code appears to promote a mix of densities across the parish. There is also some potential conflict with how development of the residential allocations adjacent to these character

areas would be treated under the Neighbourhood Plan, given that these policies seek to provide densities of approximately 30dph.

Criterion 'b' – The intention of this criterion is supported in principle. However, the current wording largely duplicates broader design principles already set out within the Design Codes and risks being overly prescriptive (e.g. specifying "typically 1 to 2 storey buildings"). The criterion may be more effective if framed more succinctly to require development proposals to be based upon and reflect a sound understanding of local context, including prevailing building heights, scale and roof forms, as defined within the relevant character areas of the Design Guidance and Codes.

Critierion 'c' – Typographical error - '***Conversation** area'*

Criterion 'l' - reference to "climatic targets for CO_2 emissions" is unclear, as no specific targets are defined within the policy. As drafted, it would be difficult to apply consistently in development management. The criterion would be more effective if expressed in clearer and more measurable terms, focusing on the incorporation of design measures to improve energy efficiency and reduce carbon emissions. It is also recommended that the policy more explicitly require proposals to demonstrate how they respond to the relevant sustainability principles set out in the Design Guidance and Codes (including SC04, GB05 and DS01–DS06).

Tourism

Paragraph 7.3 – Note that as of March 2026 the "Natural England Coast Path" has been

inaugurated as the “King Charles III England Coast Path”

Paragraph 7.8 and Footnote 11 -Note that emerging Local Plan Policy TCL1 refers to ‘Holiday Accommodation areas’ as ‘existing holiday parks’. It would be advisable to update this terminology in line with the emerging LP.

Figure 7 – The map does not reflect the extent of ‘Existing Holiday Parks’ as defined by Emerging Policy TCL1 or the current extent of the CCMA as defined by emerging Policy CLC1 (and updated based upon NCERM2 data to supersede the adopted policies map, as set out below). It would be advisable to update the figure to reflect these changes.

Paragraph 7.12 – Typographical error - “*The policy requires it to have good strategic road access to the A149 and A1064, which is convenient and means **the majority visitors** can access it…”*

Policy 4 – It should be noted that coastal sections of Scratby and California are located within the Coastal Change Management Area (CCMA). Emerging Local Plan Policy CLC1 sets out requirements for development Located within the CCMA and sets out that development should not have adverse impacts on coastal erosion and vulnerability elsewhere. Where developments are located within the CCMA will also be required to be linked to the coastal strip (with Carparks falling within this) and have time limiting conditions, and developments within the CCMA, or 30m inland, will be required to submit a Coastal Erosion Vulnerability Assessment which demonstrates there will be no increase in risk to life or property. The Policy should therefore cross-reference Policy CLC1 where such proposals are located within the CCMA or 30m inland from it.

In many cases, particularly within established coastal settlements, some degree of traffic movement through villages is unavoidable given the existing road network and settlement pattern. The criterion is somewhat ambiguous as to what ‘driving through a village’ would constitute. As drafted, the wording could unintentionally preclude otherwise suitable and well-located sites and conflict with

other elements of the Policy (such as criterion ‘b’). It may be more appropriate to require that the cumulative impact of the car-parking will not create severe impacts on the local transport network.

Additionally, for clarity, the supporting text to this Policy ought to reference species impact avoidance mitigation. Development that increases risks or harm to environmental assets will be required to mitigate such impacts. For increased recreational disturbance caused by new car parking facilities contributions to mitigate impacts will be considered on a case-by-case basis, in accordance with emerging Local Plan Policy NAT4.

Services and Facilities

Paragraph 8.2 and 8.9– As noted above, these paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission. Policy RTC4 is the relevant emerging Policy in relation to Paragraph 8.2.

Paragraph 8.4 – Typographical error - ‘The **g**arden Room’ should have a capital letter for Garden.

Policy 5 - The current wording is overly specific and may be unrealistic in practice. In particular, the requirement to provide good walking and cycling connectivity to named facilities across different settlements (e.g. between Ormesby St Margaret and Scratby) may not be achievable given the existing settlement pattern, distances involved, and limitations of the current

pedestrian and cycle network. As drafted, this could unintentionally constrain otherwise suitable development where safe and direct connections to all identified facilities cannot reasonably be provided. The criterion would be more effective if reframed to require proposals to ensure appropriate and proportionate access to local facilities within the same settlement.

Criterion 'c' - The criterion would benefit from being replaced to simply state that the facilities identified in Figure 8 should be protected in accordance with Great Yarmouth Local Plan Policy HEC4 (or any successor Local Plan policy). This would provide more clarity in decision-making given that the Policy does not introduce additional and different criteria for assessing the loss of community facilities.

Figure 8 – It is currently difficult to distinguish with precision which facilities are intended to be designated as "important community facilities" within Figure 8. To improve clarity and consistency in decision-making, it would be preferable for the Neighbourhood Plan to provide an accompanying list of identified facilities (either alongside the figure or within an appendix), rather than relying solely on mapped notation.

It is also unclear how these facilities have been selected or what evidence supports their identification as community facilities. While some identified uses clearly fall within recognised community facility categories (such as places of worship, village halls, recreation facilities and local convenience provision), the map also appears to include a range of retail and commercial uses which would not typically fall within this definition in planning policy terms.

For example, the figure appears to identify uses such as:

- Ormesby Garden Machinery
- New Sage Chinese Takeaway
- Ormesby Fish and Chips
- Miss Unique Beauty and Tanning Salon
- Bojangles Hair Studio / Trueheat Home Design Studio
- Esso Petrol Filling Station
- Green Farm Fish and Chip Shop
- Howards Store
- Scratby Bakery
- California Chippy

This list is not exhaustive, reflecting the difficulty in accurately identifying all mapped units. However, many of these uses fall within Class E or similar commercial categories and would not normally be afforded the same level of protection as community facilities under Local Plan Policy HEC4. Their inclusion risks blurring the distinction between community and commercial uses and could lead to inconsistency in the application of policy.

In addition, the inclusion of tourism-related uses and holiday parks raises a further concern. These uses are already subject to specific protection under emerging Local Plan Policy TCL4, which applies a distinct and more stringent policy test (including longer marketing requirements and an assessment of demand for tourism uses). Treating such uses as community facilities for the purposes of Policy 5 could create a policy conflict and inadvertently weaken the intended protections of Policy TCL4 by allowing alternative policy routes to be applied.

If it is the intention of the Neighbourhood Plan to provide a locally specific approach to the protection of certain commercial or tourism uses, this should be clearly set out in a separate policy, supported by appropriate evidence, rather than being incorporated within Policy 5.

Connectivity

Paragraph 9.6 - As noted above, this paragraph should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission

Policy 6 - *Development proposals must demonstrate safe walking links to local services and into the wider countryside. They will be expected to improve and/or extend footways where necessary and protect and incorporate Public Rights of Way*". Consider rephrasing the requirement to "*Development proposals must demonstrate safe walking links to local services and into the wider countryside.*
Where applicable, proposals *will be expected to improve and/or extend footways ~~where necessary~~ and protect and incorporate Public Rights of Way".* This avoids misinterpretation as requiring all development proposals to protect and incorporate Public Rights of Way, regardless of whether such routes exist within or adjacent to the site.

Green Infrastructure

Paragraph 10.4 – A Habitats Regulations Assessment (HRA) is not itself a mitigation measure, but a process used to assess potential impacts on designated sites.

Paragraph 10.7 and 10.8 – The paragraph sets out the hierarchy for BNG, however, it should set out that the preference for delivering BNG is on site with off-site only considered where it is not feasible to deliver this on site. It should emphasise that while credits are available, this should be a last resort which should only be considered when both on site BNG and off site has been exhausted or is not feasible. This paragraph should also reference Local Plan Policy NAT3 which requires all major residential, employment and retail developments to provide 20% BNG unless it has been demonstrated through a viability assessment that it is not viable. Exceptions to this local policy
requirement will include development on brownfield land or minor development, which will be expected to achieve the statutory 10% net gain where applicable.

Paragraph 10.12 – This paragraph would benefit from cross-reference to the Local Plan Design Code requirement PS5, and GB03 of the Neighbourhood Plan design code and guidance document.

Policy 7 – "*Proposals must incorporate soft boundaries, rather than hard landscaping such as closed board fencing*" – Some close-boarded fencing may be acceptable for moderate use bounding rear or side curtilages, but close boarded fences for boundary treatments to the public realm or adjoining undeveloped land/countryside should generally be avoided.

Local Green Spaces

Policy 8 - Having reviewed the proposed LGS' and supporting evidence their designation is likely to meet the criteria for designating LGS' set out in national policy. Please contact propertyenquiries@great-yarmouth.gov.uk regarding the designation of the Council owned Local Green Space. The Borough Council do not have any comments at this stage regarding its

designation.

Figure 11 – The allotments appear to be located on Cromer Road, rather than Yarmouth Road

Figures 11-18 – It would improve the clarity of the figures if the 'LGS excluded buildings' layer was removed and these spaces instead cut out of the Local Green Space. The overlapping layers are potentially confusing, particularly should this be mapped and included on any future interactive policies map.

Protection of important local views

Policy 9 - Having reviewed the proposed important local views and supporting evidence their identification appears to be generally appropriate.

Coastal Erosion

The paragraph numbering in this section appears erroneous.

Policy 10 and 11.4 – The intention of supporting properties at risk from coastal erosion, including the principle of rollback development, is noted. However, there is a risk that this policy may duplicate emerging Local Plan Policy CLC5, which addresses similar issues relating to coastal change and relocation. Given the advanced stage of the Local Plan, it is likely that this policy framework will be in place by the time of the Regulation 15 submission of the Neighbourhood Plan. As such, the policy may add limited additional value and risks unnecessary duplication. It is recommended that the Policy is deleted from the Neighbourhood Plan, and Local Plan policies are relied upon to facilitate coastal adaptation in the absence of specific local considerations.

Furthermore, some of the criteria included in Policy 10 do not function effectively as planning policy tests. In particular:

- Criterion (c), requiring conformity with other neighbourhood plan policies, is unnecessary as this is already inherent within the development plan system; and
- Criterion (d), relating to landowner willingness, is not a matter that can reasonably be controlled or required through planning policy. Anyone can submit an application provided they complete the correct ownership certificates, the planning system does not test

  'willingness' at a planning application stage. If the land is not available for development, it will not be capable of being built out. The LPA cannot refuse planning permission purely because a site isn't available or the landowner is unwilling.

Paragraph 11.24 – The CCMA has been updated with a new map which has been published. See below comments.

Figures 23 and 24 – These figures are out of date and show an CCMA extent that has been superseded. The Coastal Change Management Area (CCMA) is defined on the emerging Policies Map[1] and is based on evidence from the National Coastal Erosion Risk Mapping (NCERM2) (2024) and the Shoreline Management Plan (2012). The NCERM2 data updated the erosion extents and rates outlined within the Shoreline Management Plan to 2055 and 2105. The current Local Plan (Core Strategy and Local Plan Part 2) policies map does not display the most

up to date CCMA extent. The interactive policies map notes that the layer displayed has been superseded. The Current CCMA extent can be viewed here -- https://experience.arcgis.com/experience/b8157418648c434185e3ff6929ba9e63?draft=true

Paragraph 11.21 – This paragraph is significantly dated with the Environment Agency publishing updated coastal erosion extents as part of the National Coastal Erosion Risk Mapping updates in 2024. The North Norfolk Local Plan was adopted in December 2025 and does not contain an EN12. This reference is from the previous (now superseded) Local Plan.

Historic Environment

Paragraph 12.3 – Typographical error – "*During WW2 the coastline was heavily defended against the threat of a possible Germany invasion. Arial photographs taken in the 1940s…"*

Paragraph 12.5 - As noted above, these paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission

Non-designated Heritage Assets

Paragraph 12.12 - As noted above, this paragraphs should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission

Policy 12 - As currently drafted, the policy raises concerns regarding consistency with national policy and the basic conditions. Paragraph 216 of the NPPF requires that "*The effect of an application on the significance of a non-designated heritage asset should be taken into account… a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*". The Policy therefore introduces a more restrictive "no harm/minimise harm" approach, rather than clearly applying the required balanced judgement between harm and public benefits.

Design Guidance and Codes Document

Page 5, Section 1.4 – 2021 Census Population data is available and should be used rather than the 2011 data which is now 15 years old.

Page 5, Section 1.5 and Figure 1 – This section does not reference emerging allocation ORM3 and is based upon the adopted Local Plan Part 2. As noted above, this section is likely to solely reference a superseded document by the time of any Regulation 15 submission, and should be revised to reference the emerging Local Plan as per its status at the time of any such submission.

Figure 2 and 12 – The figures shows the former Duncan hall school as an 'existing school site'. Given that the site is no longer in active use as a school the map should be amended to remove the polygon from this area.

Page 9 – As the both Regulation 15 and adoption of the NP will follow after adoption of the emerging Great Yarmouth Local Plan (anticipated in July 2026), reference to the Core Strategy and LPP2 should be removed and replaced with the emerging Local Plan

Figure 12 – The existing holiday park is labelled as 'Primary Holiday Accommodation Area' by the figure key. This reference should be updated to reflect the terminology of 'Existing Holiday Parks' used by Policy TCL1 of the emerging Local Plan.

Page 29 –Figure 28 – The diagram uses the term 'Local Green Spaces' to indicate generic public amenity spaces. The terminology should be updated to avoid confusion with the Local Green Spaces that the Neighbourhood Plan is seeking to designate.

Page 33 – GB 05.01 SuDS – The section should reflect the surface water disposal hierarchy in accordance with Anglian Water's surface drainage Policy. Should re-use and discharge by infiltration not be possible, then discharge to an open surface water body, surface water sewer, highway drain or other drainage system should be considered prior to allowing any discharge to a combined sewer.

Page 35 – GB 05.02 Permeable Paving – The second paragraph appears to be unfinished and should be reviewed.

Page 41 – LC01 Boundary Treatment – Typographical error – "*Boundary features should be*
encourage *to consistent with the characters while enabling enough variations for visual interest*"

Page 52 – DS 05 Adaptability – Note that Local Plan Part 2 Policy A2(f) requires that all new homes must be built to meet requirement M4(2) of Part M of the Building Regulations for accessible and adaptable dwellings where practicable. Emerging Local Plan Policy HOU9 sets out that all new homes must be designed and built to meet requirement M4(2) of Part M of the Building Regulations unless it can be robustly demonstrated it is not practicable to do so due to the physical characteristics of the site. The emerging Local Plan Policy would also require that 10% of the affordable housing provided on site in accordance with Policies HOU1 and HOU3 should comply with requirement M4(3) of the building regulations.

Page 55 – Section 4.3 – It is potentially confusing to refer to the three character areas of Ormesby St Maragret, Scratby and California in this section, having defined different character areas earlier in the document. Terminology should be used that differentiates between the character areas to improve useability.

Page 56-58 – The diagrams illustrate parking arrangements located forward of the principal elevations of dwellings. While this may be an appropriate solution in certain character areas, particularly where supported by effective landscaping, it should not be interpreted as a preferred or default approach. Front-of-plot parking can risk dominating the streetscape and undermining design quality if not carefully managed. For larger or more comprehensive developments (as opposed to small-scale infill), greater emphasis should be placed on a range of design-led parking solutions, including side-plot, rear court, or integrated arrangements that minimise visual impact and support high quality placemaking. The guidance would benefit from clarifying that parking design should be context-specific and subordinate to overall design quality, which has been effectively incorporated into requirement SC03.

Section 5 - The concept masterplans should be renamed to reflect the allocation references within the emerging Local Plan eg. OT1 – ORM1 and OT2 -ORM2. It is notable that the design codes and guidance omit a concept masterplan for ORM3, despite allocating the site for more dwellings than the ORM2 allocation. It is accepted that this is likely a consequence of when the design guidance was completed, though it would benefit from being updated to reflect the emerging allocation.

Page 61 – 5.2 Site OT1 – As noted above, this section should be updated to reflect the status of the emerging Local Plan, including reflecting that the emerging Local Plan would allocate the site for a

minimum of 200 dwellings, rather than approximately 190 dwellings.

Page 62 - As noted above, this figure should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission.

Page 63 – 5.3 Site OT2 - As noted above, this section should be updated to reflect the status of the emerging Local Plan, including reflecting that the emerging Local Plan would allocate the site for a minimum of 32 dwellings.

Page 68 – 5.2.2 Frontages – As noted above, this figure should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission

Page 72 - 5.6.2 Frontages – "*The façades of each dwelling should follow the guidance set out in LC.03 Materials and building details on page 42"* – This paragraph should state page 43 rather than 42. As noted above, this figure should be updated to reflect the status of the emerging Local Plan prior to any Regulation 15 submission.