

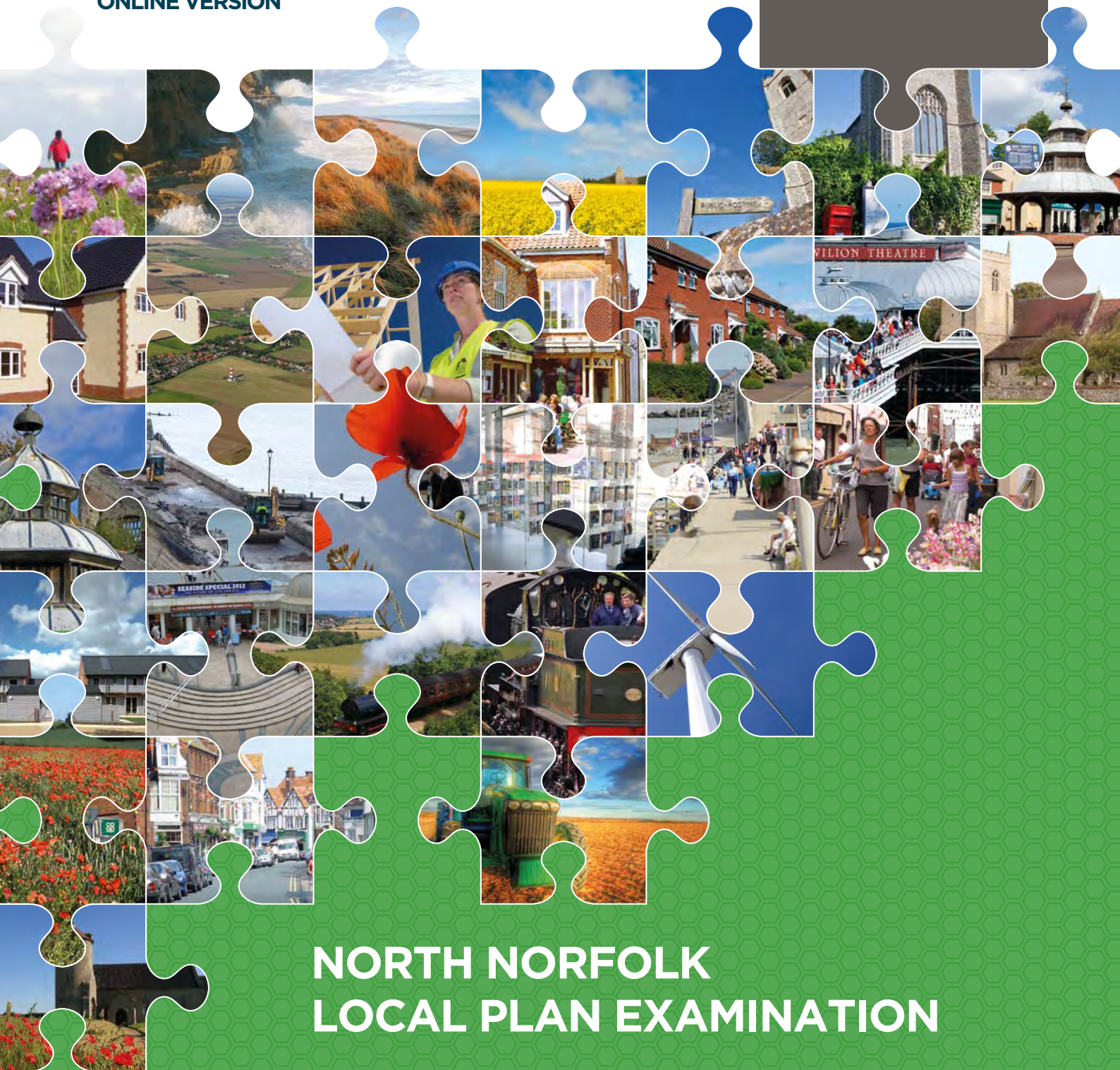


**NORTH
NORFOLK
DISTRICT
COUNCIL**

North Norfolk Local Plan

2024-2040

ONLINE VERSION



NORTH NORFOLK LOCAL PLAN EXAMINATION

Further Consultation

(to address the Planning Inspector's interim findings)

Consultation period 6 November to 18 December 2024

www.north-norfolk.gov.uk/localplan

Important Information

Document Availability

Please note that the documents referred to within this document can be viewed or downloaded at: www.north-norfolk.gov.uk/examinationlibrary. If a document produced by the Council is not available please contact us with your request.

All Council produced documents referred to can be viewed at North Norfolk District Council offices in Cromer during normal office hours.

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**All documents can be made available in
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Introduction

1 Introduction	1
1.1 Background	1
1.2 Local Plan Examination: Interim Findings	1
1.3 Overall effect of the Proposed Changes	2
1.4 Consultation	2
1.5 Next Steps	4

Proposed Changes

2 Places & Sites	5
2.1 Cromer: Land at Runton Road / Clifton Park (C10/1)	5
2.2 Cromer: Land West of Pine Tree Farm (C22/4)	8
2.3 North Walsham: Land at End of Mundesley Road (NW16)	11
2.4 Hoveton: Land East of Tunstead Road (HV01/C)	13
2.5 Hoveton: Land at Stalham Road (HV06/A)	16
2.6 Stalham: Land at Brumstead Road (ST04/A)	19
2.7 Stalham: Land Adjacent Ingham Road (ST19/B)	21
2.8 Blakeney: Land West of Langham Road (BLA01/B)	24
2.9 Briston: Land at Astley School (BRI02/C)	27
2.10 Ludham: Land South Of School Road (LUD01/C)	29
2.11 Mundesley: Land off Cromer Road & Church Lane (MUN03/A)	32
3 Small Growth Villages	35
4 Gypsy, Traveller & Travelling Showpeople's Accommodation	39

Appendices

Appendix 1: Additional Sites Review Background Paper	43
Appendix 2: Distribution of Growth (Small Growth Villages) Addendum	45
Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum	47
Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)	49
Appendix 5: Sustainability Appraisal Addendum	51

Contents

Appendix 6: Habitat Regulations Assessment Addendum	53
Appendix 7: Inspectors Interim Findings Letter & Related Correspondence	55

1 Introduction

- 1.0.1** The purpose of this consultation is to publish and to seek feedback on a number of **Proposed Changes** to the submitted North Norfolk Local Plan, which is currently undergoing formal examination by an independent planning inspector.

1.1 Background

- 1.1.1** The Draft North Norfolk Local Plan was submitted to government for independent examination on 11 May 2023. The Plan is currently being examined by Mr David Reed, who was appointed by the Planning Inspectorate to determine if the Plan is sound, legally compliant and suitable to be adopted.
- 1.1.2** Stage 1 public hearing sessions were held between January and March 2024. Following this, the Inspector wrote to the Council on 24 May 2024⁽¹⁾, and subsequently on 30 August 2024. In [these letters](#), the Inspector highlighted three main concerns relating to soundness where he considered that changes would be required, and further consultation undertaken.
- 1.1.3** The main areas of concern are detailed below in 1.2 'Local Plan Examination: Interim Findings'.
- 1.1.4** The Inspector also outlined a number of additional changes which are not considered as 'main soundness issues'. These additional changes are not part of this consultation and will be available for comment at a future public consultation stage (known as 'Main Modifications'), following any further hearing sessions.
- 1.1.5** Details of the examination are available at www.north-norfolk.gov.uk/localplanexamination

1.2 Local Plan Examination: Interim Findings

- 1.2.1** In his [interim findings](#), the Inspector set out **three main areas of concern** as detailed below. In responding to the interim findings, the Council has prepared additional documentation relating specifically to these areas of concern. The Inspector has requested that North Norfolk District Council undertakes public consultation on the following Proposed Changes to the plan, including a number of supporting documents:

1. **Shortfall in Housing Provision**

The Inspector identified an overall shortfall in planned housing provision in the Draft Plan. In order to address the shortfall and to provide flexibility in the delivery of new housing across the revised Plan period 2024-40, new site allocations, extended site allocations, and an increase in the indicative new housing allowance for Small Growth Villages are proposed.

See **Proposed Change 1-11** in Section 2 'Places & Sites'

See **Proposed Change 12-13** in Section 3 'Small Growth Villages'

¹ This letter was held in abeyance due to the general election period of sensitivity and was released to the Council on 19 July 2024.

1 Introduction

2. Spatial Strategy: Small Growth Villages

The Inspector suggested that the approach to Small Growth Villages in Policy SS1 'Spatial Strategy' could be broadened to support additional growth, including that which allows rural areas to grow and thrive. The proposals to address the main areas of concern include identifying additional Small Growth Villages.

See **Proposed Change 12** in Section 3 'Small Growth Villages'

3. Gypsy, Traveller & Travelling Showpeople's Accommodation

Updating the Gypsy and Traveller evidence base to reflect the change in definition brought in in December 2023 and to bring forward any necessary changes to section 7.5 of the Plan that might arise from this updated evidence.

See **Proposed Change 14** in Section 4 'Gypsy, Traveller & Travelling Showpeople's Accommodation'

1.3 Overall effect of the Proposed Changes

1.3.1 In para 47 of his [interim findings letter](#)⁽²⁾, the Inspector concluded that '*...the provision made by the submitted plan should be increased by at least 1,000 dwellings to allow some flexibility*'

1.3.2 If all of the Proposed Changes outlined in this consultation document are made to the Plan it will enable a minimum of **1,271 additional dwellings** to come forward over the Plan period 2024-2040. This is comprised of:

- **Site Allocations** (new and extended) - approximately **850** additional dwellings
- **Small Growth Villages** (new and existing) - approximately **421** additional dwellings

1.3.3 A number of other sources of additional dwelling supply are expected to further increase the overall forecasted delivery of housing across the Plan period as detailed in correspondence contained in Appendix 7. These additional changes are not part of this consultation but are expected to form part of the anticipated Main Modifications publication, following any further hearing session(s)

1.4 Consultation

1.4.1 We are inviting comments on the 14 **Proposed Changes** outlined within this document. The consultation is open for a six-week period beginning at midday on **Thursday 7 November** and closing at midday on **Thursday 19 December 2024**. It is important to note that this consultation is not inviting comments on other aspects of the draft North Norfolk Local Plan.

1.4.2 Supporting the consultation are a number of background documents contained within the Appendices:

- 'Appendix 1: Additional Sites Review Background Paper'
- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'

² See 'Appendix 7: Inspectors Interim Findings Letter & Related Correspondence'

- 'Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum'
- 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'
- 'Appendix 5: Sustainability Appraisal Addendum'
- 'Appendix 6: Habitat Regulations Assessment Addendum'
- 'Appendix 7: Inspectors Interim Findings Letter & Related Correspondence'

Submitting comments

- 1.4.3** We want to hear from you if you either support or object to the Proposed Changes, or if you simply wish to make a comment.
- 1.4.4** It is important to make clear which Proposed Change or Supporting Document your comments relate to. Our online [Consultation Portal](#) allows you to navigate the document and to log comments in the relevant places.
- 1.4.5** Comments should be submitted at <https://consult.north-norfolk.gov.uk> and received by no later than midday **Thursday 19 December 2024**. All comments must be made on the specified Consultation Response Form. We are unable to accept representations which are received outside of the advertised consultation period.
- 1.4.6** Your representation will firstly be considered by the Council, and subsequently by the appointed Planning Inspector who is currently conducting an examination to determine if the Plan is sound, legally compliant and suitable for adoption.

Viewing the documents

- 1.4.7** This consultation document, and all supporting documents, can be found in the Examination Library at www.north-norfolk.gov.uk/localplanexamination

Information Points

- 1.4.8** Paper copies of the consultation document and the supporting documents are available to view on request at the following locations during normal opening hours:
- Libraries: Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham, Wells-next-the-Sea, Wroxham and Norwich (The Forum)
 - Council offices: Cromer, Fakenham

Contact us

- 1.4.9** If you have difficulty submitting a representation, have particular accessibility requirements, or wish to speak to us on a related matter, please contact us:
- planningpolicy@north-norfolk.gov.uk
 - 01263 513811
 - Planning Policy, NNDC Council Offices, Holt Road, Cromer, NR27 9EN
 - Other ways to contact us can be found at www.north-norfolk.gov.uk/contact-us
- 1.4.10** If you wish to visit the Council offices to view the documents, we recommend making an appointment via the above 'contact us' web page.
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1 Introduction

1.5 Next Steps

- 1.5.1** Following close of the consultation, all responses will be considered by the Council and subsequently forwarded to the Inspector for consideration.
- 1.5.2** It is anticipated that further public hearing sessions will take place in early 2025 in order to allow for discussion on the Proposed Changes put forward in this consultation.
- 1.5.3** Further updates will be published at www.north-norfolk.gov.uk/localplanexamination

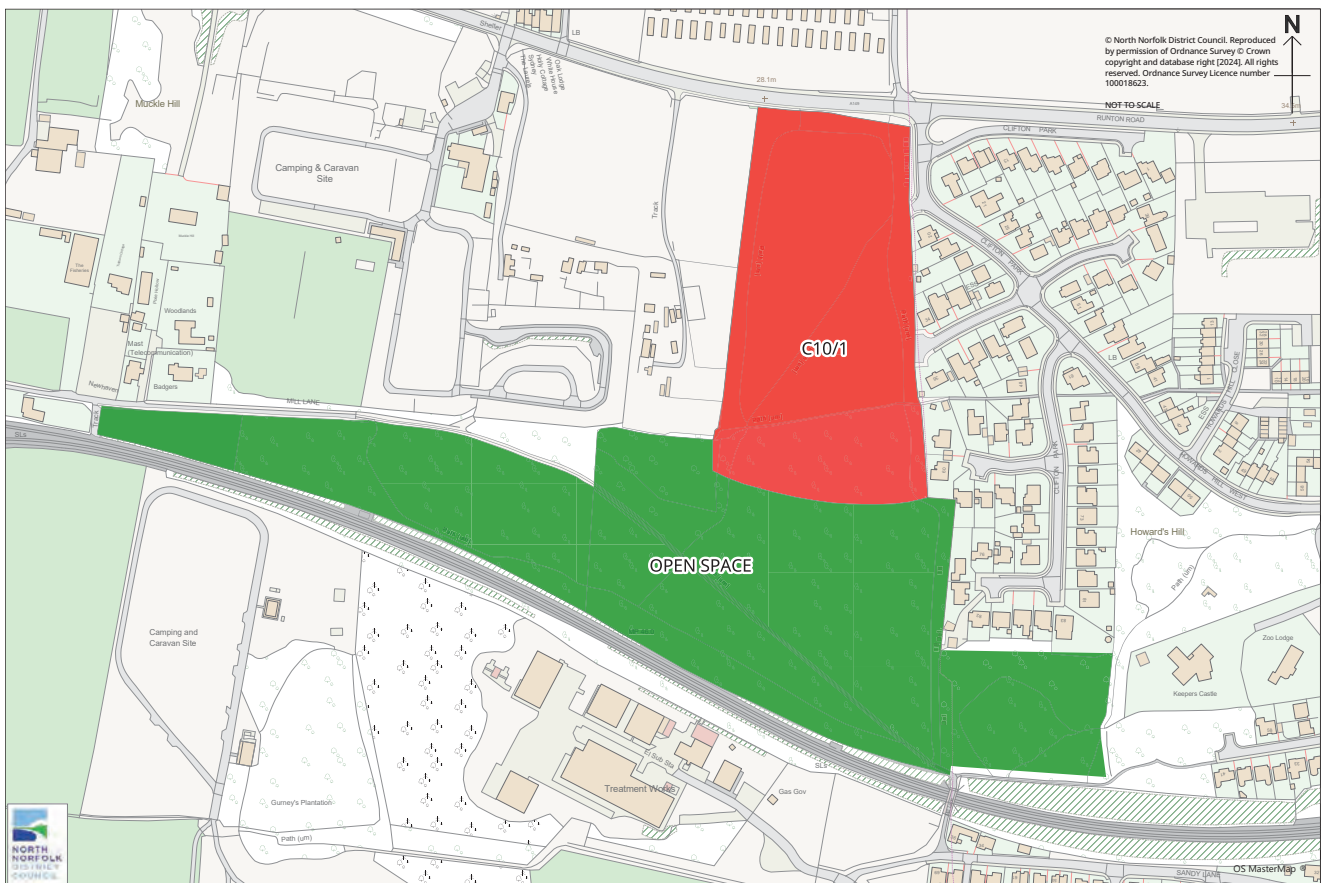
2 Places & Sites

2.1 Cromer: Land at Runton Road / Clifton Park (C10/1)

Proposed Change 1

New Site Allocation: Land at Runton Road / Clifton Park, Cromer

The following site is allocated for residential development of approximately 70 dwellings, public open space, and associated on and off-site infrastructure:



Land at Runton Road/Clifton Park (C10/1)

Description

2.1.1 The site is located to the west of the town and is bounded by residential development to the east, Runton Road to the north and a railway line to the south. The site is outside the Norfolk Coast National Landscape and gently slopes from the Runton Road up towards the railway and the start of the Cromer Ridge. There are good pedestrian and public transport links available.

Constraints

2.1.2 Development proposals will have to take into account:

- It is important that landscaping and an open, and stepped-back built frontage along Runton Road is provided to retain a green approach to the western side of the town. The site is

2 Places & Sites

adjacent to the Norfolk Coast National Landscape and consequently there should be suitable landscape treatment to the south of the site. The undulating landscape within the site and its impact on long-ranging views

- The amenity value of any local open space
- The railway line and Cromer Wastewater Recycling Centre lie to the south-west of the site and development of the site should have regard to the potential amenity impacts (noise and odours) arising from these uses.

Deliverability

- 2.1.3** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. An area of indicative designated open space is identified on the Policies Map. Development should be achievable within the plan period.

Draft Policy C10/1

Land at Runton Road / Clifton Park

Land amounting to approximately 8 hectares, as defined on the Policies Map, is allocated for development of approximately 70 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access from either Runton Road and/or the adjacent Clifton Park development;
2. Careful attention to site layout, design and building heights in order to minimise the visual impact of the development on long-ranging views from the National Landscape to the west;
3. Development should be located to the north of the site, and stepped-back from Runton Road to ensure an open frontage to the site;
4. High-quality landscaping should be provided to the rear of the built development and adjacent to the railway line;
5. Development should include the provision of approximately 5.3ha of designated open space, as identified on the Policies Map (with a focus on retaining and enhancing ecology and wildlife habitats), which should be retained in perpetuity;
6. The delivery of on-site multi-functional open space together with measures for its on-going maintenance, taking into consideration public access and visual amenity needs;
7. Development should have careful attention to form and site layout in order to appropriately mitigate the amenity impacts from Cromer Wastewater Recycling Centre;
8. Provision of new, and enhancement of existing pedestrian/cycle links throughout the southern area of the site with appropriate access to the built development, and connectivity with Clifton Park, Mill Lane, Fulcher Avenue, Sandy Lane, as well as north-south pedestrian access between the site and Clifton Park;
9. The submission, approval and implementation of a Surface Water Management Plan ensuring that there are no adverse effects on European sites and greenfield run off rates are not increased;
10. The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered prior to occupation of any dwellings; and,
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

Places & Sites 2

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

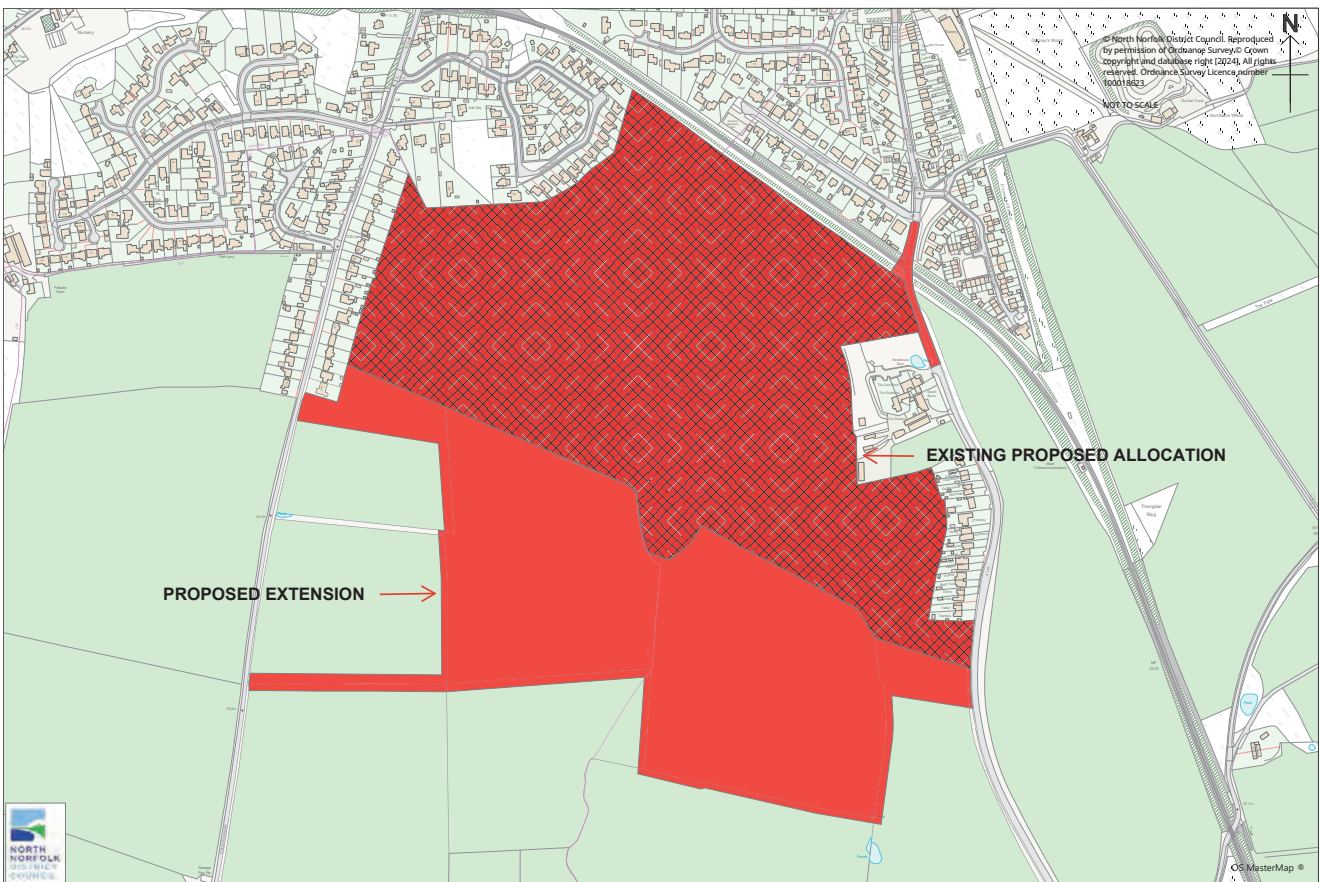
2 Places & Sites

2.2 Cromer: Land West of Pine Tree Farm (C22/4)

Proposed Change 2

Extended Site Allocation: Land West of Pine Tree Farm, Cromer⁽³⁾

The following site is allocated for a mixed-use development of approximately 500 dwellings, specialist elderly persons accommodation, sport and recreational facilities, public open space, and associated on and off-site infrastructure:



Land West of Pine Tree Farm (C22/4)

Description

- 2.2.1** This site is a combination of the existing proposed allocation C22/2, and an extended area to the south. The entire site is now referred to as C22/4. The combined site can deliver approximately 500 residential dwellings and 67 dwellings equivalent of specialist elderly persons accommodation, public open space and associated on-site and off-site infrastructure.
- 2.2.2** Access would be onto Norwich Road with two access points, including a roundabout on the southerly access.
- 2.2.3** The site is within the Norfolk Coast National Landscape and is visible from the south and the immediate surrounding landscape. Although clearly a significant development in the context of

³ It is recommended to refer to section 10 'Cromer' of the [Submission Version Local Plan](#) for context.

the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area.

- 2.2.4** Due to the topography of the site, the surrounding development and landscaping, the eastern section is not overly prominent in the wider landscape. The impact of development in this area would be mitigated by retaining existing hedges/ trees around the site, incorporating internal open space and tree planting within the site, and introducing a landscaped buffer to the southern boundary. The site is adjacent to the Grade II Listed Pine Tree Farmhouse along Norwich Road. The development layout and landscaping should consider the impact on the listed building and wider landscape.

Constraints

- 2.2.5** Development proposals will have to take into account:

- The site would extend further into the open countryside and the National Landscape. To mitigate this, landscape buffering along the southern boundary and careful consideration of the design and layout of the entire site, especially for the extended area will be needed.
- Anglian Water advise that off-site water mains reinforcement will be required and enhancements to the foul sewerage network capacity may be required.
- Sports pitches and facilities are required on part of the site.
- A new roundabout access is required to Norwich Road.
- Safe pedestrian routes to schools, health and town centre facilities should be provided.

Deliverability

- 2.2.6** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy C22/4

Land West of Pine Tree Farm, Norwich Road

Land amounting to 44 hectares, as defined on the Policies Map, is allocated for development of approximately 500 dwellings, in addition to 67 dwellings equivalent of specialist elderly persons accommodation, sport and recreational facilities and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, the provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;
2. Provision of two vehicle access points onto the A149. The provision of a roundabout at the southern access should be provided prior to occupation of dwellings on the site;
3. The submission, approval and implementation of a Transport Impact Assessment, to be publicly consulted on, to include analysis of the impact of the development on the local road network, including during construction, and to identify the mitigation and solutions that may be required;

2 Places & Sites

4. Careful attention to site layout, building heights and materials, with provision of landscape buffering along the southern boundary, in order to minimise the visual impact of the development on the Norfolk Coast National Landscape;
5. The provision of not less than 4.9 hectares of multi-functional open space together with measures for its on-going maintenance;
6. Unless alternatives are first agreed by the Local Planning Authority, the provision of land suitable for a sports pitch(es), the size and type to be agreed in consultation with the Local Planning Authority, plus an agreed contribution towards delivery;
7. Provision of additional green infrastructure on the site should be designed to maximise connectivity between the residential development and the open space. Biodiversity improvements and access should be provided to Beckett's Plantation and opportunities should be sought for its enhancement and connectivity with open space to the south;
8. Retention and enhancement of hedgerows and trees around and within the site including the protection of existing woodland within the site;
9. The existing public footpath through the site should be retained and upgraded to a surfaced route within in a green corridor and a new route should be provided from the site to connect with Roughton Road;
10. The submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;
11. The submission, approval and implementation of a Foul Drainage Strategy, details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;
12. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling, in accordance with the phasing strategy to be agreed for the site, to prevent detriment to the environment and comply with Water Framework Directive obligations;
13. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);
14. Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses;
15. Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping.

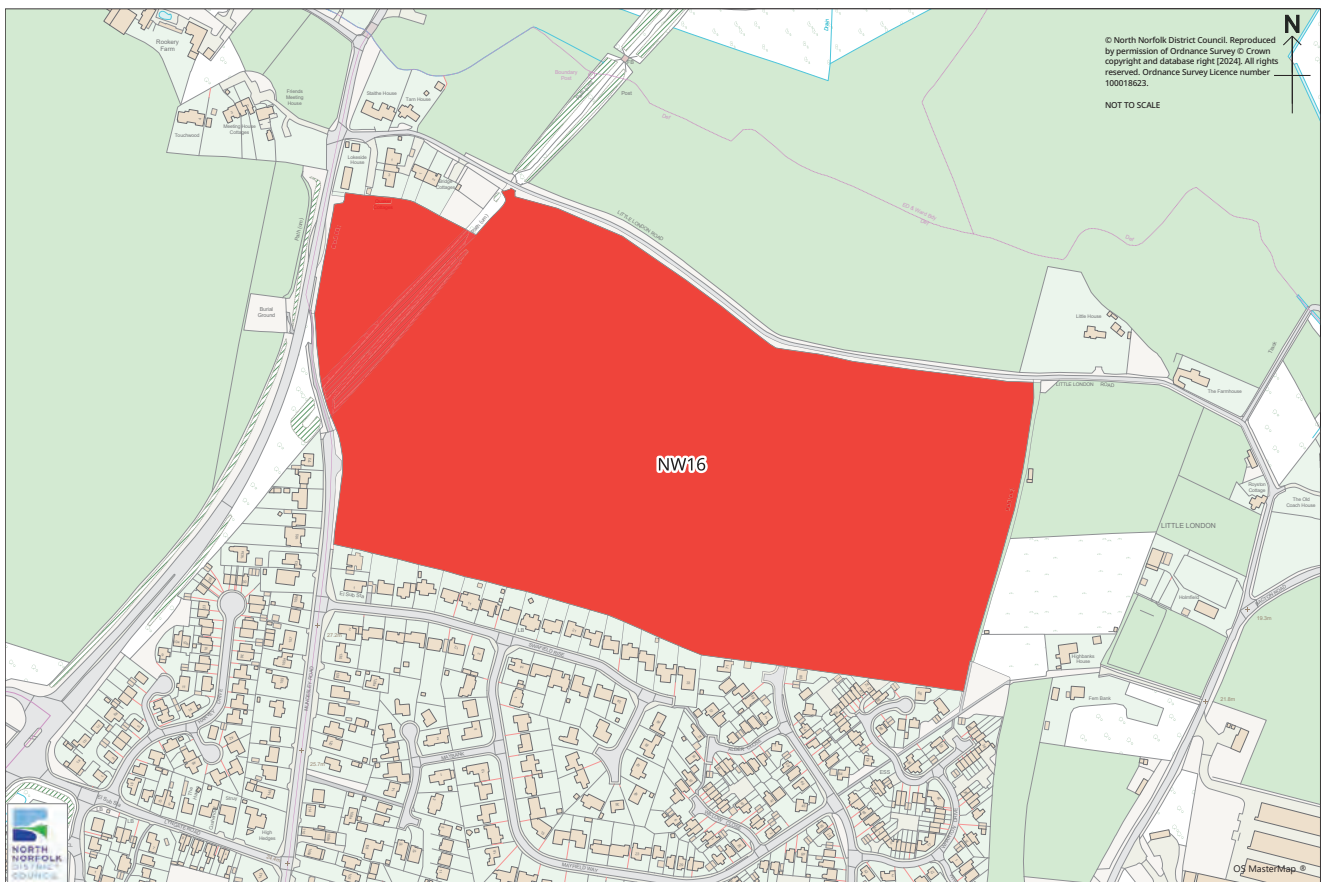
The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

2.3 North Walsham: Land at End of Mundesley Road (NW16)

Proposed Change 3

New Site Allocation: Land at End of Mundesley Road, North Walsham

The following site is allocated for a mixed-use development including approximately 330 dwellings, specialist elderly persons accommodation, public open space and associated on and off-site supporting infrastructure:



Land at End of Mundesley Road (NW16)

Description

- 2.3.1** This site is a greenfield site located on the northeast edge of North Walsham. The former railway line, which now forms the Paston Way trail and Knapton Cutting County Wildlife Site, intersects diagonally across the northwestern part of the site and has a lower elevation. The site is bounded by existing residential properties along its southern and part of the western boundaries. The main part of the site is relatively flat, sloping gently downwards to the southeast.
- 2.3.2** The site has reasonable connectivity to town centre services and facilities. North Walsham has good public transport links with both bus and rail being available and there is an existing employment area located to the southwest of the site, which can be easily accessed.

Constraints

- 2.3.3** Development proposals will have to take into account:

2 Places & Sites

- The provision of a primary access onto the B1145 and the potential for a secondary access onto Mundesley Road/Lyngate Road. Provision of and a pedestrian/cycle link to Acorn Road. A new bridge will need to be provided over Paston Way to facilitate access to the B1145.
- The presence of existing heritage assets within the vicinity of the site.
- The presence of a gas pipeline to the north-west of the site following the route of the former railway line, which will require an off-set from residential development.
- The existing mature hedgerows and trees north and east of the site will need to be retained and enhanced to mitigate the site's impact on wider views. Development should be located adjacent to existing built form south of the site, and extensive open space and landscape planting provided to the north.

Deliverability

- 2.3.4** The site is considered suitable and available for development. It is in single ownership and the owner confirms its availability for development. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy NW16

Land at End of Mundesley Road

Land amounting to approximately 16 hectares, as defined on the Policies Map, is allocated for development of approximately 330 dwellings, in addition to 40 dwellings equivalent of specialist elderly persons accommodation, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

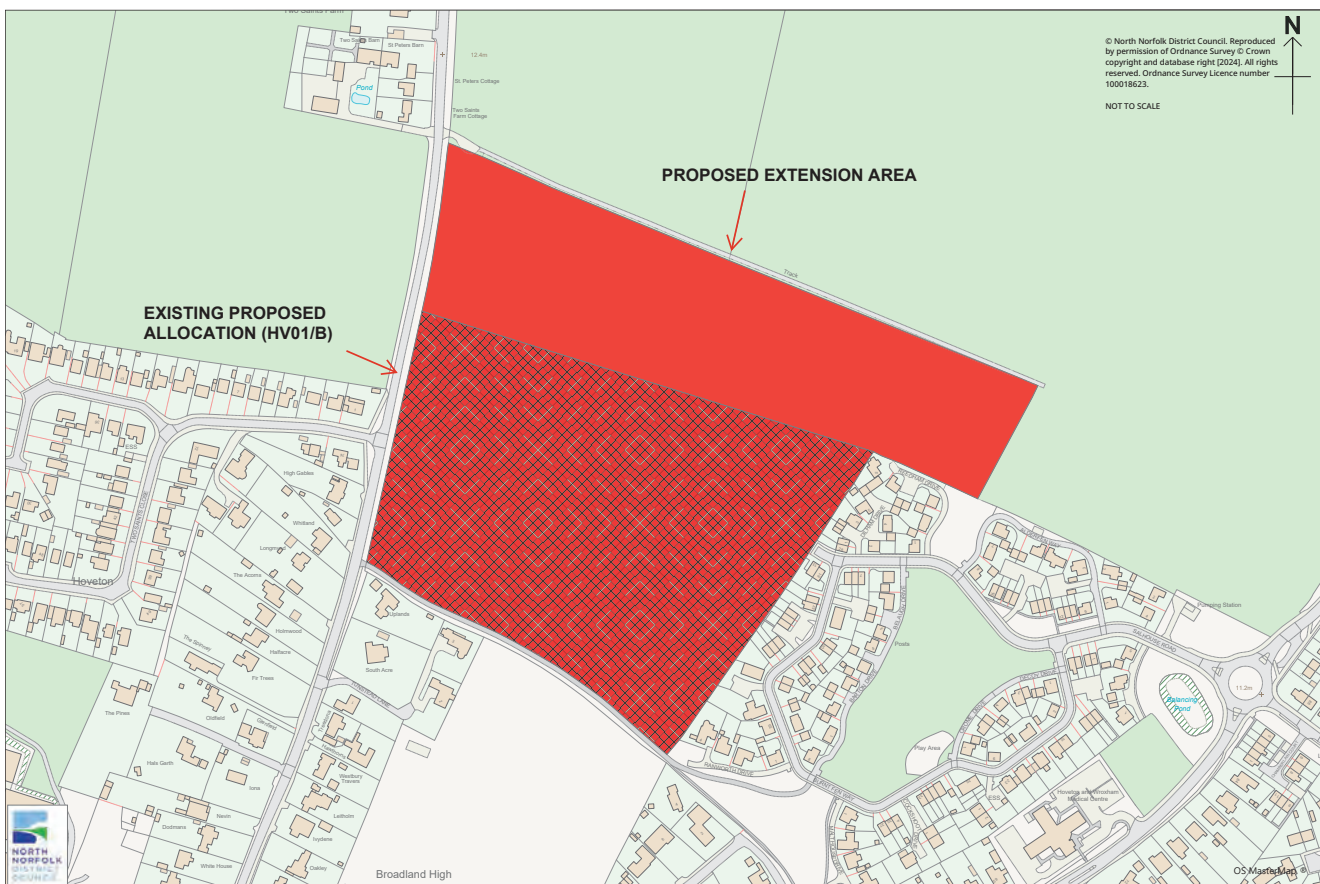
1. Provision of convenient and safe vehicular access onto the B1145 and additional access provided onto Mundesley Road/Lyngate Road;
2. Provision of a bridge over the Paston Way trail that facilitates access to the B1145 and the rest of the site, careful attention should be given to its design, layout and ability to mitigate and enhance the character of the Paston Way trail and Knaption Cutting County Wildlife Site, ensuring the north-western triangle of land is used for access and landscaping only;
3. Retention and enhancement of the existing mature hedgerows and trees along the northern and eastern boundary of the site;
4. Development should be located to the south of the site with careful attention to site layout and design which incorporates significant open space to the north along with suitable and enhanced landscaping buffer;
5. Provision and enhancement of access to the Paston Way trail and FP11 pedestrian/cycle link with a new pedestrian/cycle link connecting both, and the provision of a new pedestrian/cycle link providing access to Acorn Road;
6. The delivery of multi-functional open space together with measures for its ongoing maintenance;
7. The submission, approval and implementation of a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased;
8. The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered prior to occupation of any dwellings;
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

2.4 Hoveton: Land East of Tunstead Road (HV01/C)

Proposed Change 4

Extended Site Allocation: Land East of Tunstead Road, Hoveton⁽⁴⁾

The following site is allocated for residential development of approximately 150 dwellings and 40 dwellings equivalent of specialist elderly persons accommodation, public open space, and associated on-site and off-site infrastructure:



Land East of Tunstead Road (HV01/C)

Description

- 2.4.1** This site is a combination of the existing allocation, HV01/B and an extended area to the north of the site. The entire site is now referred to as HV01/C. The combined sites can deliver approximately 150 dwellings and 60 elderly persons accommodation units (approx. 40 dwelling equivalent), public open space and associated on-site and off-site infrastructure.
- 2.4.2** The site as a whole is situated on greenfield land, on the northern edge of Hoveton to the east of Tunstead Road. The site is level, predominately in arable agricultural use and lacks any specific topographical or landscape features, apart from the mature hedgerows that border it.

⁴ It is recommended to refer to section 13 'Hoveton' of the [Submission Version Local Plan](#) for context.

2 Places & Sites

The setting of this site has changed considerably in recent years with the development of the previous HV03 allocation at Stalham Road developed by Persimmon Homes as 'Brook Park'. It is well related to existing residential areas including this recent development.

- 2.4.3** The extended site is located within walking distance of the key services including the rail station and the High School which is around 1.2 km from the primary school. There is a surfaced cycle and pedestrian path which links Tunstead Road and Stalham Road with bus services available on both.
- 2.4.4** The hedgerow along the Tunstead Road frontage with the exception of the required access onto this road should be retained where appropriate and a landscaping buffer should be provided to soften the impact of development to the agricultural land to the north of the site.

Constraints

- 2.4.5** Development proposals will have to take into account:
- A water catchment strategy is required including a foul water drainage strategy which must complement or align with the overall catchment strategy. An acceptable foul water drainage strategy will involve appropriate / suitable mitigation measures to account for the new development flows discharging foul water while the existing foul water sewerage network is surcharged due to rainfall. Mitigation measures involve running underground pipes to the north of the existing Brook Park and then on to the site which will take foul water from the development directly to Belaugh Water Recycling Centre, where there is capacity.
 - Access to be provided off Tunstead Road with a through connection to Stalham Road and the adjoining allocation.
 - A public footpath and cycle path crosses the site.
 - The site's potential impact on existing heritage assets, including St. Peter's Church, a listed building which lies north of St. Peters Lane.
 - A water main crosses the site.

Deliverability

- 2.4.6** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy HV01/C

Land East of Tunstead Road

Land amounting to 10.6 hectares, as defined on the Policies Map, is allocated for development of approximately 150 dwellings, in addition to 40 dwellings equivalent of specialist elderly persons accommodation, open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Delivery of a carefully designed residential development that will integrate into the surrounding character;
2. Provision of convenient and safe vehicular access which includes appropriate traffic calming onto Tunstead Road, and the provision of a through-connection for all vehicles to the adjoining allocation and the Brook Park/Stalham Road Roundabout;
3. Provision of pedestrian and cycle connections through the development and adjoining allocation which encourage walking and cycling into Hoveton and neighbouring areas, including green

- access corridors to the open space and to the existing cycle path which runs through the south west of the site;
4. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on heritage assets, including the Hoveton Hall Park and Garden;
 5. Delivery of not less than 1.07 hectares of multi-functional open space together with measures for its on-going maintenance;
 6. Retention of existing trees and hedgerows where appropriate around the site;
 7. Submission of a Transport Assessment undertaken for this development and the adjoining allocation, HV06/A, identifying sustainable traffic mitigation measures that alleviate the potential cumulative impact on the road network.
 8. Submission, approval and implementation of a site-specific Water Catchment and Foul Water Drainage Strategy incorporating new pipe work to the north of the allocation and Brook Park that includes direct foul water drainage connection to Belaugh WWTW, in agreement with Anglian Water, and aligned with the Anglian Water catchment strategy, and network improvements;
 9. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;
 10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);
 11. Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses.

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

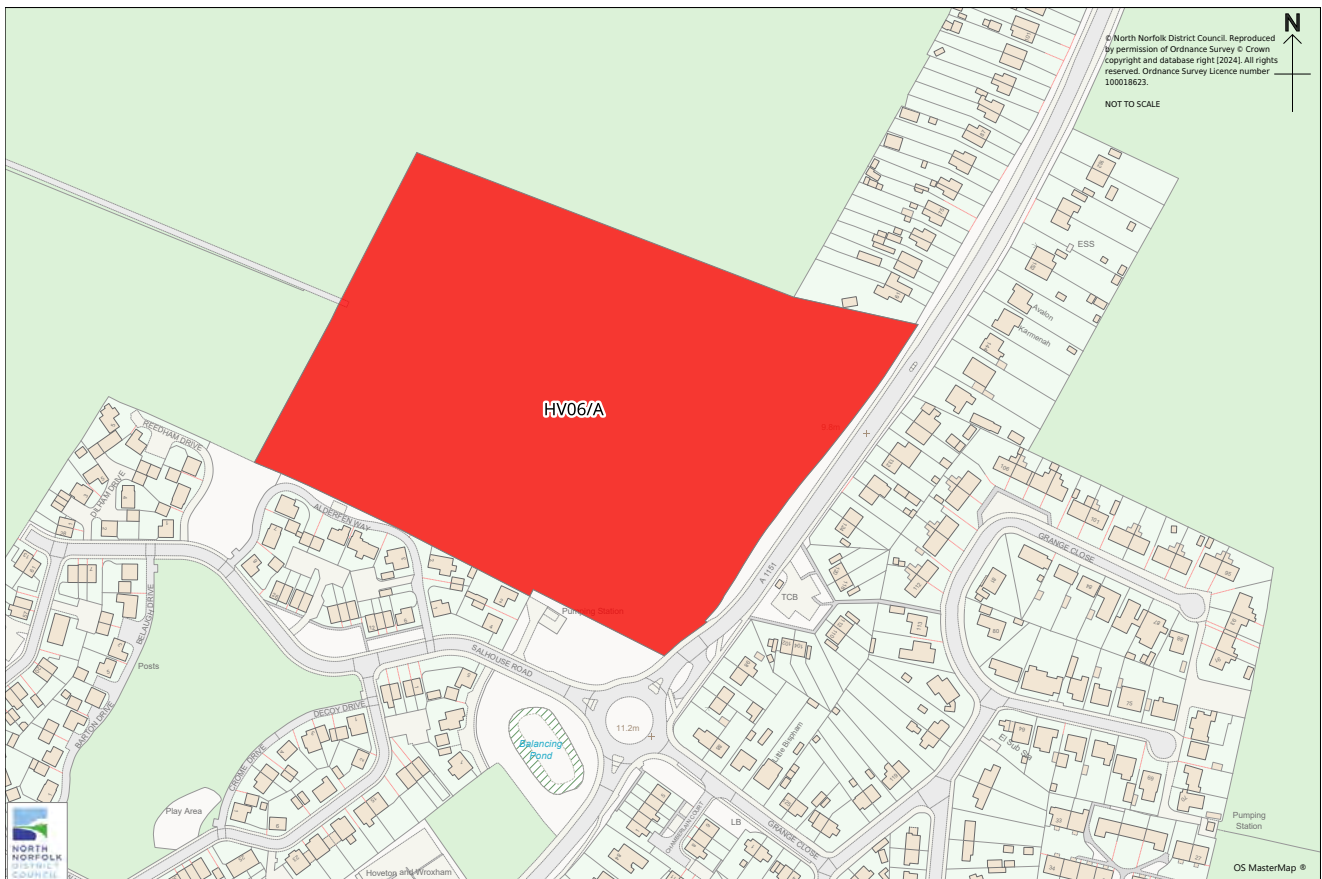
2 Places & Sites

2.5 Hoveton: Land at Stalham Road (HV06/A)

Proposed Change 5

New Site Allocation: Land at Stalham Road, Hoveton

The following site is allocated for residential development of approximately 50 dwellings, public open space, and associated on and off-site infrastructure:



Land at Stalham Road (HV06/A)

Description

- 2.5.1** This site is part of an agricultural field located to the north of Hoveton and would extend the existing linear ribbon form of development along the A1151 Stalham Road. The site is bounded by residential development to the south and abuts Stalham Road to the east where the site links to a string of existing dwellings at its northeast corner. The site abuts the more recent Brooke Park development to the south.
- 2.5.2** The site has good connectivity to village centre services and other facilities and offers sustainable travel options.

Constraints

- 2.5.3** Development proposals will have to take into account:
- The boundary adjacent to Stalham Road contains existing hedgerow.

- There is a moderate area in the centre of the site that may be susceptible to surface water flooding, however, the site is within Flood Zone 1.
- Suitable access can be achieved onto Stalham Road, however, a wider transport assessment will be required in line with the Norfolk County Council's standard guidelines due to sensitive parts of the existing network.
- The well-established hedgerow separating the site's frontage with Stalham Road.
- The site's potential impact on existing heritage assets, including St. Peter's Church, a listed building which lies north of St. Peters Lane.
- A water catchment strategy is required including a foul water drainage strategy which must complement or align with the overall catchment strategy. An acceptable foul water drainage strategy will involve appropriate / suitable mitigation measures to account for the new development flows discharging foul water while the existing foul water sewerage network is surcharged due to rainfall.

Deliverability

- 2.5.4** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

Draft Policy HV06/A

Land at Stalham Road

Land amounting to approximately 2.9 hectares, as defined on the Policies Map, is allocated for development of approximately 50 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Delivery of a carefully designed residential development that will integrate into the surrounding character;
2. Provision of a convenient and safe access onto Stalham Road;
3. Appropriate off-site mitigation improvements to the A1151/A1062 double mini roundabout prior to first occupation;
4. Provision of a 3.0m wide pedestrian/cycleway along the full extent of the site frontage onto Stalham Road and provision of pedestrian/cycle connection to adjoining allocation;
5. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on the Hoveton Hall Park and Garden;
6. Retention and enhancement of the existing hedgerow fronting Stalham Road where appropriate;
7. Delivery of multi-functional open space together with measures for its on-going maintenance;
8. Submission of a Transport Assessment undertaken for this development and the adjoining allocation, HV01/C, identifying sustainable traffic mitigation measures that alleviate the potential cumulative impact on the road network.
9. Submission, approval and implementation incorporating new pipe work north of the allocation and Brooke Park that includes direct foul water drainage connection to Belaugh WWTW, in agreement with Anglian Water, and aligned with the Anglian Water catchment strategy, and network improvements

2 Places & Sites

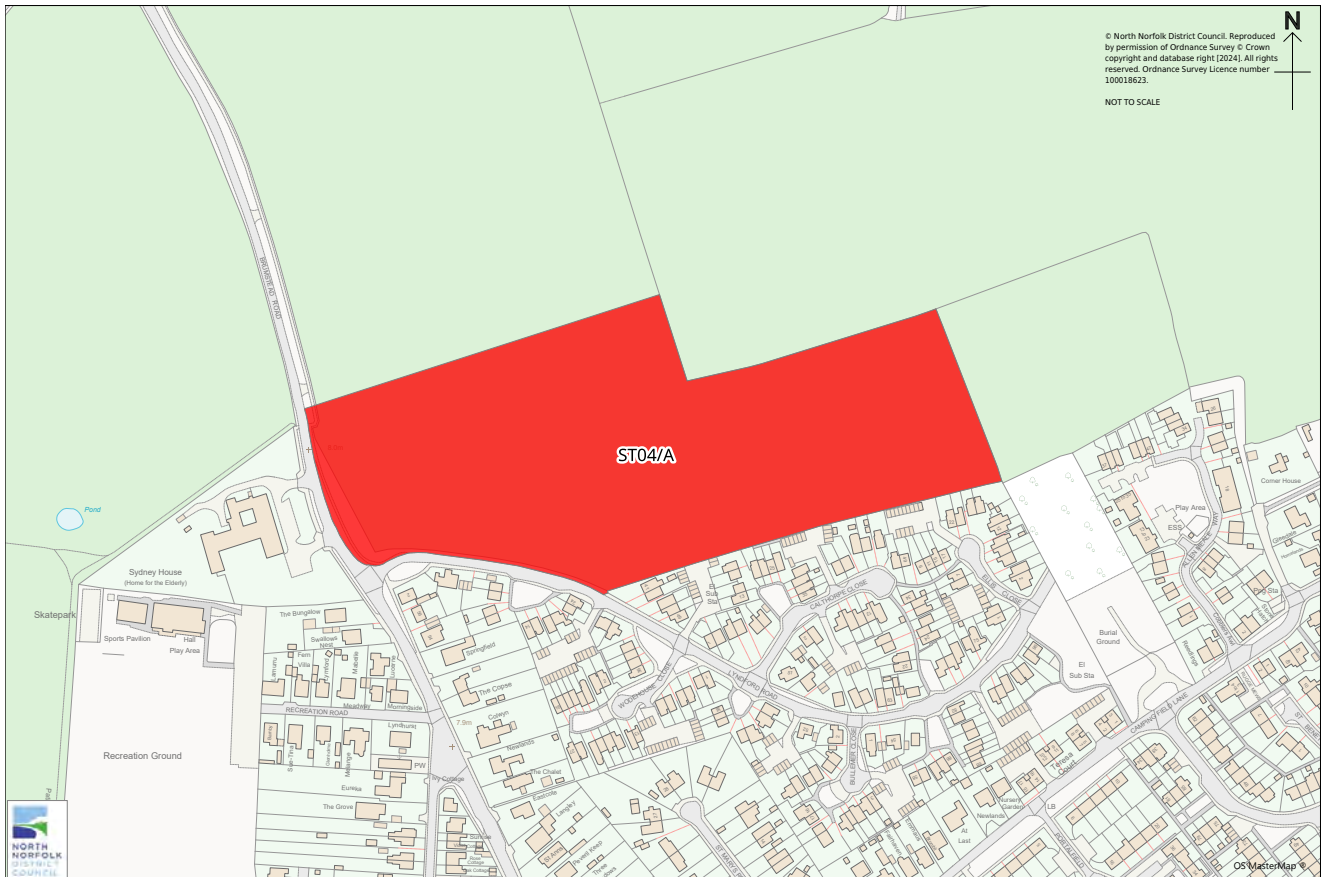
10. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

2.6 Stalham: Land at Brumstead Road (ST04/A)

Proposed Change 6

New Site Allocation: Land at Brumstead Road

The following site is allocated for residential development of approximately 45 dwellings, public open space, and associated on and off-site infrastructure:



Land at Brumstead Road (ST04/A)

Description

2.6.1 The site is flat and there are moderately long views of the site available however this is broken up by the presence of existing and well-established field boundaries to the north and north-east. The site abuts the existing built form of Stalham which in this location, the residential area immediately south of the site is considered to be of a high density. A mature hedgerow adjacent to Lyndford Road separates the entryway of Lyndford Road to the south.

Constraints

2.6.2 Development proposals will have to take into account:

- The presence of the existing mature hedgerow adjacent to Lyndford Road, which should be retained and enhanced.

2 Places & Sites

- The site extends into the open countryside without any existing field boundaries to the north. A new, landscaped boundary should be established that creates a soft edge that appropriately enhances the local character.
- Access should be onto Brumstead Road.

Deliverability

- 2.6.3** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

Draft Policy ST04/A

Land at Brumstead Road

Land amounting to approximately 5 hectares, as defined on the Policies Map, is allocated for development of approximately 45 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of convenient and safe vehicular access onto Brumstead Road.
2. Provision and enhancement of the existing footpath along the frontage of the site and Brumstead Road to create an improved pedestrian/cycle link that connects with the existing footpath at Lyndford Road;
3. Provision of a new pedestrian/cycle link that connects the site to FP10 and provides a through connection to Brumstead Road;
4. Retention and enhancement of the existing hedgerow adjacent to Lyndford Road and the enhancement of the existing hedgerows and mature trees fronting Brumstead Road where appropriate;
5. Delivery of layout, design and landscaping of the site that respects the setting of the site on the edge of the town and careful attention to building heights and materials;
6. Provision of a landscaped buffer north of the site to establish a new boundary that softens the views from the north of the site;
7. The submission, approval and implementation of a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased;
8. Delivery of multi-functional open space together with measures for its on-going maintenance;
9. The provision of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

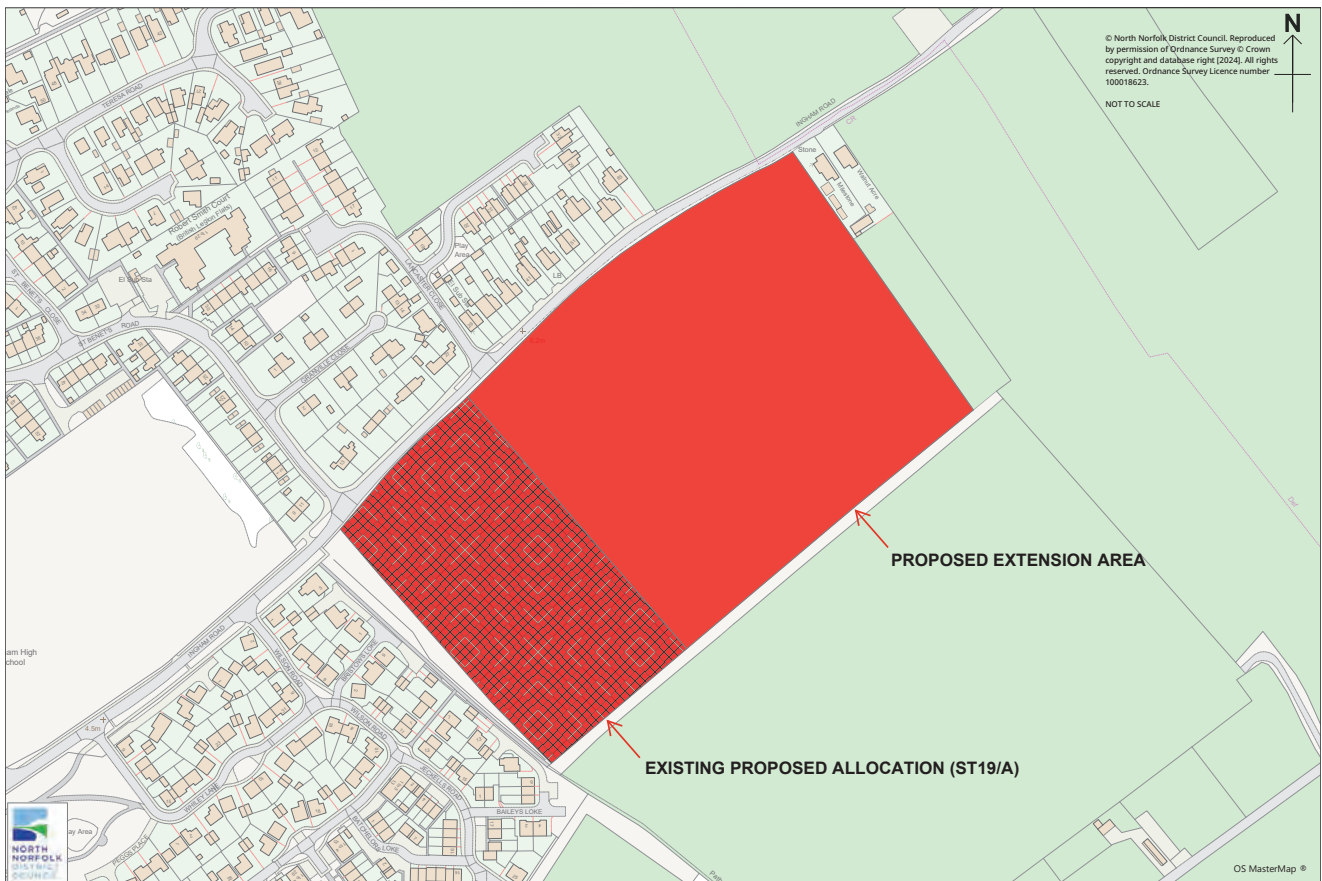
The site is partly underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

2.7 Stalham: Land Adjacent Ingham Road (ST19/B)

Proposed Change 7

Extended Site Allocation: Land Adjacent Ingham Road, Stalham⁽⁵⁾

The following site is allocated for residential development of approximately 150 dwellings, public open space, and associated on and off-site infrastructure:



Land Adjacent Ingham Road (ST19/B)

Description

- 2.7.1** This site is a combination of the existing allocation ST19/A, and an extended area to the north-east. The entire site is now referred to as ST19/B. The combined sites can deliver approximately 150 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.7.2** The site is greenfield land located on the north-eastern edge of Stalham comprising a large arable field located on Ingham Road. Existing dwellings are located adjacent to the southwestern and majority of the north-western boundaries of the site, along with linking to two properties in the northwest corner.

⁵ It is recommended to refer to section 16 'Stalham' of the [Submission Version Local Plan](#) for context.

2 Places & Sites

- 2.7.3** The site is well related to existing residential areas and to facilities and services within the town being only a short distance from the town centre and local schools. There are footpath links along Ingham Road and bus services available

Constraints

- 2.7.4** Development proposals will have to take into account:
- The site consists of Grade 1 agricultural land. However, its allocation would have a minimal impact on the overall supply in the town.
 - Anglian Water advised that off-sites mains reinforcement is required and enhancements to the foul sewerage network capacity may be required before development can proceed.

Deliverability

- 2.7.5** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy ST19/B

Land Adjacent Ingham Road

Land amounting to approximately 7.2 hectares, as defined on the Policies Map, is allocated for residential development of approximately 150 dwellings, public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access to Ingham Road;
2. Provision of a 2.0m footway along the full width of the southern frontage;
3. Widening of Ingham Road carriageway to 6.0m for the full width of the site frontage;
4. Submission, approval, and implementation of a Transport Assessment to assess whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149;
5. Delivery of layout, design and landscaping of the site that respects the setting of the site on the edge of the town and careful attention to building heights and materials;
6. Provision of a suitable landscaping scheme including, where appropriate, the retention of existing mature trees and the planting of new trees within the site;
7. Provision of appropriate landscape buffering including the retention of existing mature trees along the northern boundary to soften the impact on adjacent dwellings and mitigate the wider views from the north of the site. Retention and enhancement of existing landscaping along the south-eastern boundary of the site;
8. Provision of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;(new wording required);
9. Delivery of multi-functional open space together with measures for its on- going maintenance;
10. Site layout and design should take account of a redundant water main within the site; and,
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future

Places & Sites 2

development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

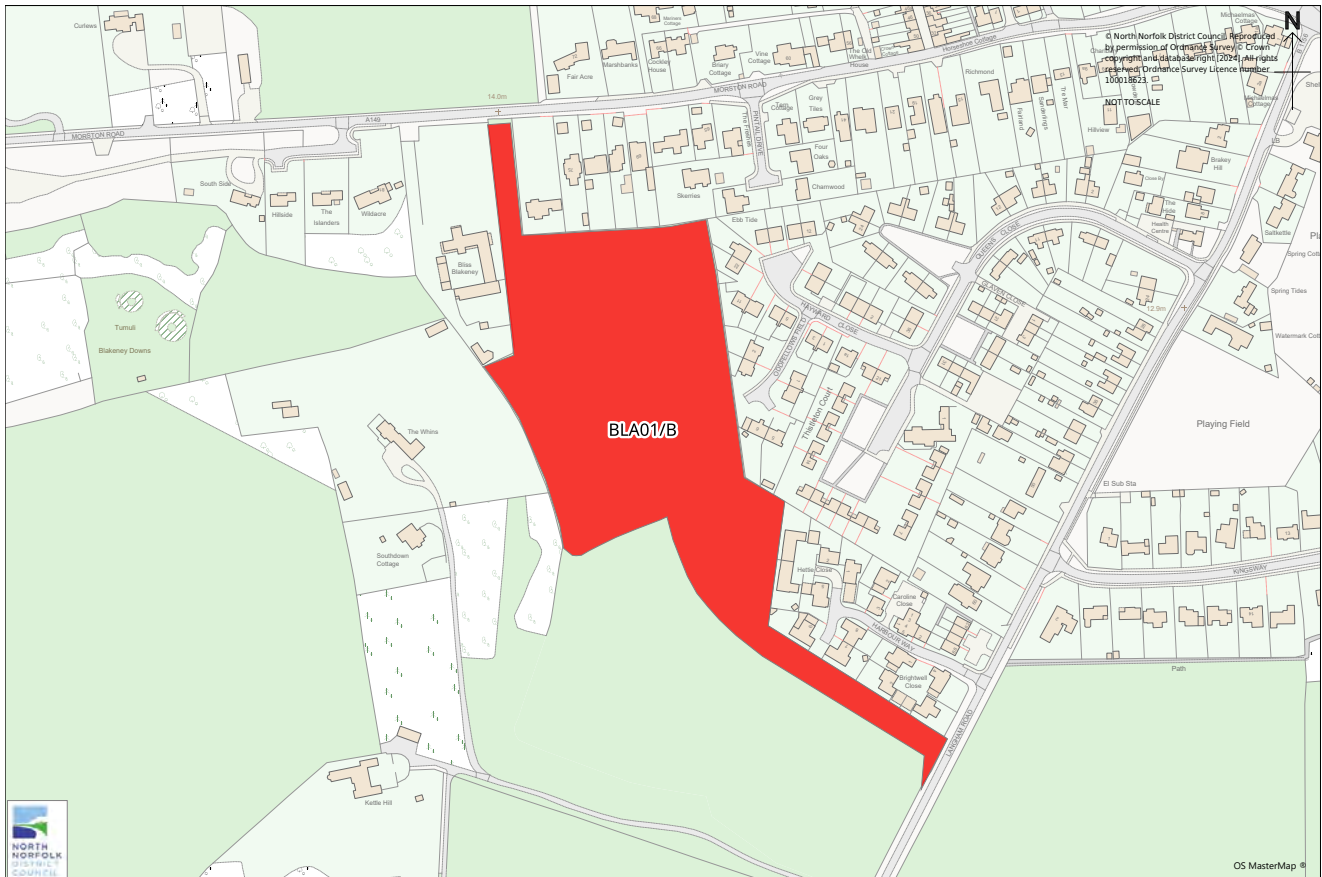
2 Places & Sites

2.8 Blakeney: Land West of Langham Road (BLA01/B)

Proposed Change 8

New Site Allocation: Land West of Langham Road, Blakeney

The following site is allocated for residential development for approximately 30 dwellings, public open space, and associated on and off-site infrastructure:



Land West of Langham Road (BLA01/B)

Description

- 2.8.1** The site comprises of part of an agricultural field located on the south-west side of Blakeney on the south side of Morston Road, where the majority of land sits adjacent to the existing built form. Existing residential dwellings, including the previous allocation now built out at Harbour Way bound the site to the north, east and partly to the west. Vehicular access is from Langham Road.
- 2.8.2** The site is within the Norfolk Coast National Landscape and acceptable proposals will need to pay particular attention to the landscape impacts of development. Successful schemes will only be supported on the northern part of the site and not on the higher ground to the south and west. Acceptable proposals will need to pay particular attention to the level changes of the site in relation to landscape and neighbouring residential impacts of development. Building heights, roofing materials, proliferation of glazing and the overall design and layout should aim to minimise the impact of development.

- 2.8.3** Vehicular and pedestrian access should be provided to Langham Road with pedestrian access also onto Morston Road. Off-site improvements to footpaths and crossing points are required to ensure safe walking routes to the villages and services.

Constraints

- 2.8.4** Development proposals will have to take into account:

- The provision of a vehicular and a pedestrian access onto Langham Road which is suitable and safe, landscaped, and well-designed.
- The provision of a pedestrian/cycle link to Morston Road.
- The site is within the Norfolk Coast National Landscape. In order to mitigate the site's impact, the built development should be located to the north-east of the site, adjacent to the existing built form.
- A Scheduled Monument is located to the west and therefore development will need to provide effective mitigation which includes the enhancement of existing natural boundaries to mitigate the impact on its setting.
- A new footpath will be required from the site access to Morston Road, eastwards to connect to the core of the settlement, alongside improvements to existing crossing points.
- An extension will also be required to Langham Road footway in order to connect to the existing footway at the junction of Harbour Way.
- Anglian Water advise that enhancements to the local foul water drainage network may be required, and any development of the site should comply with the conclusions of a comprehensive foul and surface water strategy.

Deliverability

- 2.8.5** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

Draft Policy BLA01/B

Land West of Langham Road

Land amounting to approximately 3.1 hectares, as defined on the Policies Map, is allocated for development of approximately 30 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of convenient and safe vehicular access including alterations onto Langham Road, including carriageway widening at the site frontage to a minimum of 5.0m;
2. Residential development should be limited to the north and east of the site;
3. Delivery of high-quality design which pays careful attention to site layout, building heights, materials and glazing in order to minimise the impact of the development on the National Landscape and wider landscape views of Blakeney Marshes, and to protect the residential amenities of adjacent occupiers;
4. Provision of footway improvements along Langham Road, including the provision of a 2.0m wide footway along the site frontage where appropriate, and extending within the highway to the junction of Harbour Way;
5. Provision of a new pedestrian/cycle link that connects the site to Morston Road including associated off-site improvements, connecting through to Langham Road;

2 Places & Sites

6. Provision of high-quality landscaping buffer along the western boundary to Morston Road, and the creation of a soft edge to the southern site boundary and access road to Langham Road, including the retention and enhancement of the existing boundary trees and hedgerows;
7. On-site delivery of multi-functional open space together with measures for its on-going maintenance;
8. Development should conserve, and where appropriate enhance the significance of heritage assets to the west of the site and provide appropriate mitigate for the impact of development on their setting;
9. Submission, approval and implementation of a Surface Water Management Plan ensuring that there are no adverse effects on European Sites and greenfield run off rates are not increased;
10. Submission, approval and implementation of a Foul Water Drainage Strategy demonstrating how additional foul flows will be accommodated within the foul sewerage network;
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).

2.9 Briston: Land at Astley School (BRI02/C)

Proposed Change 9

Extended Site Allocation: Land at Astley Primary School, Briston⁽⁶⁾

The following site is allocated for residential development of approximately 90 dwellings, public open space, school parking, and associated on and off-site infrastructure:



Land at Astley School (BRI02/C)

Description

- 2.9.1** This site is a combination of the existing allocation, BRI02 and an extended area to the south and south-east. The entire site is now referred to as, BRI02/C. The combined sites can deliver approximately 90 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.9.2** This site is an extension of the existing allocation, BRI02. It comprises of additional agricultural to the south. It is well located in the village with good pedestrian access to key village facilities including the primary school, village shops, doctors' surgery and recreational facilities, and provides for an additional 50 dwellings
- 2.9.3** Vehicular access to the site would be from Fakenham Road which borders the northern boundary of the site.

⁶ It is recommended to refer to section 19 'Briston' of the [Submission Version Local Plan](#) for context.

2 Places & Sites

Constraints

2.9.4 Development proposals will have to take into account:

- Provision of a car parking (pick up and drop off) facility for the school in association with BRI02. Vehicular access will be through the existing allocation, BRI02.
- Pedestrian / cycleway connections across the site from the adjoining existing housing to the Primary School should be delivered.
- Water main crosses the site and enhancement to the foul sewerage network capacity will be required.
- Potential impacts on heritage assets to the east.

Deliverability

2.9.5 The site is suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy BRI02/C

Land at Astley Primary School

Land amounting to approximately 9.4 hectares, as defined on the Policies Map, is allocated for residential development for approximately 90 dwellings, public open space, school parking and associated supporting on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan and the following site-specific requirements:

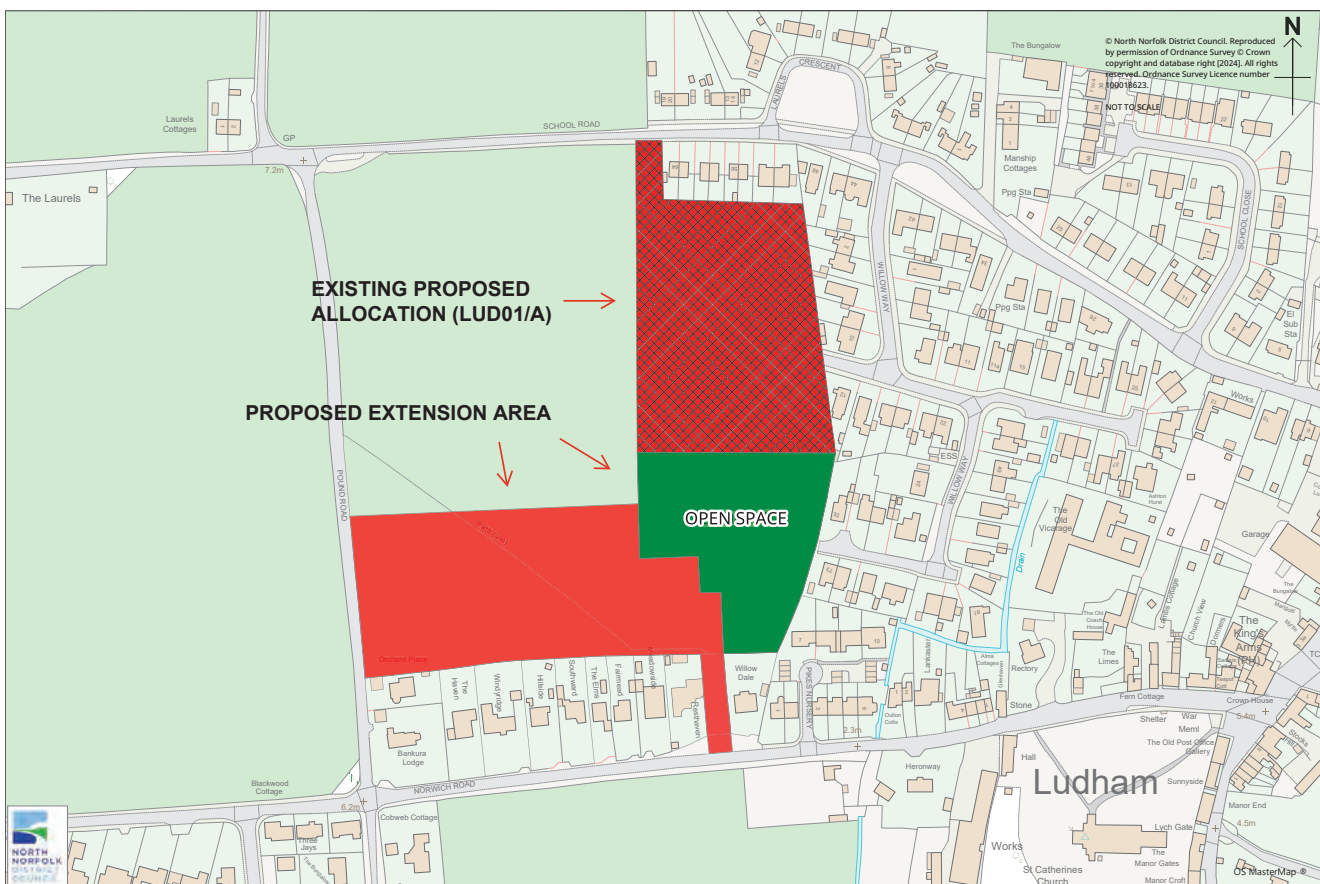
1. Setting back of development from the road frontage along Fakenham Road unless an alternative design approach is identified as more practical and feasible;
2. Provision of a convenient and safe vehicular access from Fakenham Road and/or Hillside;
3. Provision of a car parking area for the school (drop-off and pick-up);
4. Development layout that does not prejudice the potential development/ redevelopment of land to the west including provision of a vehicular access point;
5. Provision of landscaping, green wildlife links throughout the site, and pedestrian/cycle access to the existing network;
6. Submission, approval and implementation of a Foul Drainage Strategy including how additional foul flows will be accommodated within the foul sewerage network;
7. Delivery of multi-functional open space together with measures for its on-going maintenance;
8. Retention and enhancement of existing hedgerows and landscaping along the southern boundary to mitigate the impact of wider views from the south and west.
9. Development should conserve, or where appropriate, enhance the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Manor Farmhouse Grade II listed building
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)

2.10 Ludham: Land South Of School Road (LUD01/C)

Proposed Change 10

Extended Site Allocation: Land South of School Road, Ludham⁽⁷⁾

The following site is allocated for residential development of approximately 60 dwellings, public open space, and associated on and off-site infrastructure:



Land South Of School Road (LUD01/C)

Description

- 2.10.1** This site is a combination of the existing allocation, LUD01/A and an extended area to the south and south-west. The entire site is now referred to as, LUD01/C. The combined sites can deliver approximately 60 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.10.2** The extension to this site comprises of an agricultural field with hedgerow to the western boundary adjacent to Pound Lane. It lies adjacent to established residential development to the north, east and south. Convenient pedestrian links are available to the primary school, recreation ground and general store.
- 2.10.3** A development which accommodates a comprehensive landscaping scheme that reflects the site's prominent edge of settlement location can be suitable in this location.

⁷ It is recommended to refer to section 20 'Ludham' of the [Submission Version Local Plan](#) for context.

2 Places & Sites

Constraints

2.10.4 Development proposals will have to take into account:

- The eastern boundary of the site, abutting the existing built development is in Flood Zone 2, which should have a minor impact on the layout of the site. However, development should still ensure that any part of the site demonstrated to be at risk of flooding during the lifetime of the development remains undeveloped. A flood risk assessment / or Flood Warning & Evacuation Plan may be required as part of a planning application to assess all forms of flooding to and from the development and inform the inclusion of suitable control measures. The settlement is located within a larger dry island.
- Anglian Water advises that there is a sustainability reduction at Ludham water treatment works and off-site water mains reinforcement and enhancement to the water recycling centre will be required. Enhancements to the foul sewerage network may also be required before development can proceed. Anglian water's final Drainage and Wastewater Management Plan 2023 confirms the medium-term plan includes multiple solutions at the WRC and in the network. Investment in additional WRC flow capacity is planned between 2020 – 2025. In the medium-term a new permit with increased capacity is proposed at the WRC. Mixed strategies are planned for the network with a main solution of SuDS. The long-term strategy includes infiltration reduction and 25% surface water removal from the network as a solution to address the internal and external sewer flooding risk
- Wider views of St. Catherine's Church.

Deliverability

2.10.5 The site is suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy LUD01/C

Land South of School Road

Land amounting to approximately 3.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately 60 dwellings inclusive of open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access via Norwich Road and/or Willow Way to accommodate development to the south of the site. No access should be provided from Norwich Road to land north of the designated open space as shown on the Policies Map.
2. Provision of pedestrian footway to connect with the school bus service stop on School Road, and a pedestrian/cycle link that connects development to the north and south of the designated open space as shown on the Policies Map;
3. Delivery of a high quality landscaping scheme particularly along the western and northern boundary;
4. Development should have careful attention to form and site layout by providing approximately 0.7ha of designated open space to the east of the site as shown on the policies map in order to allow for wider views from School Road to the Grade I Listed, St Catherine's Church;
5. Delivery of multi-functional open space together with measures for its on-going maintenance;
6. Submission, approval and implementation a foul drainage strategy setting out how additional foul flows will be accommodated within the foul sewerage network and it is demonstrated that there is adequate capacity in the water recycling centre;

Places & Sites 2

7. Provision of required off-site water mains reinforcement;
8. Provision of adequate information in order to undertake a project Level Habitat Regulation Assessment, HRA, addressing issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites;
9. Provision of a satisfactory Flood Risk Assessment and completion of any necessary flood mitigation measures; and,
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

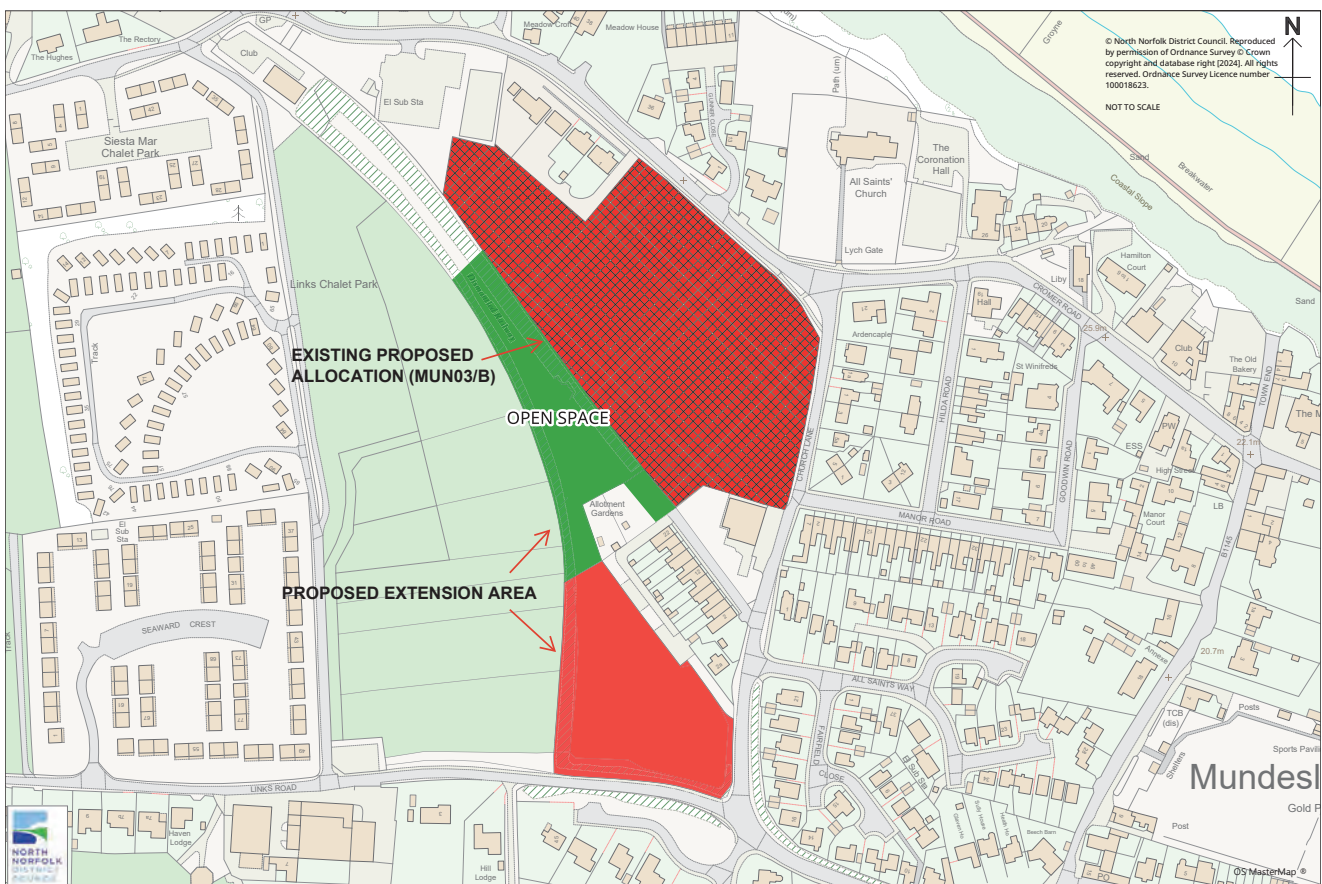
2 Places & Sites

2.11 Mundesley: Land off Cromer Road & Church Lane (MUN03/A)

Proposed Change 11

Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley⁽⁸⁾

The following site is allocated for residential development of approximately 45 dwellings, public open space, and associated on and off-site infrastructure:



Land off Cromer Road & Church Lane (MUN03/A)

Description

- 2.11.1** The site is a combination of the existing allocation, MUN03/B and an extended area to the south. The entire site is now referred to as, MUN03/A. The combined sites can deliver approximately 45 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.11.2** This site is located just outside the residential area of Mundesley with the former railway embankment abutting the western boundary. The site has three distinct characteristics: 1) the northern section is an elevated pasture field in a prominent part of the village; 2) the former railway embankment with scrub and trees; and 3) the southern part of the site is an open pasture field. The openness of both the northern and southern parts of the site should be carefully considered and developed in a way that does not negatively harm the surrounding landscape.

⁸ It is recommended to refer to section 21 'Mundesley' of the [Submission Version Local Plan](#) for context.

- 2.11.3** The site is well located to the existing infrastructure and services in the historic village center (Station Road and the High Street) and additional services along Beach Road.
- 2.11.4** The openness of both the northern and southern parts of the site and the potential impact of development on the landscape will influence design and layout. Furthermore, the site is adjacent to the Conservation Area and the northern part is directly opposite the Grade II listed church. Therefore, any development will require a considered design and landscape led approach to the layout and design of the development.
- 2.11.5** The former railway embankment and associated trees and scrub in the middle of the site would provide open space.

Constraints

- 2.11.6** Development proposals will have to take into account:
- Anglian Water identify that for new development of over 10 dwellings that some enhancement to the foul sewerage network capacity will be required and off-site mains water supply reinforcement may be required.
 - There is no footway fronting the site's entrance. A footway will need to be provided along Church Lane and connect to All Saints Way.
 - Access to the northern section of the site will need to be provided from Cromer Road. Access for the southern section of the site should be onto Church Lane and avoided from Links Road as it is of a higher elevation.

Deliverability

- 2.11.7** The site is considered suitable and available for development. It is in single ownership and the owner confirms availability for development. There are limited constraints on the site and development should be achievable within the plan period.

Draft Policy MUN03/A

Land off Cromer Road & Church Lane

Land amounting to approximately 3.2 hectares, as defined on the Policies Map, is allocated for residential development of approximately 45 dwellings inclusive of open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies of this Plan and the following site-specific requirements:

1. Development proposals should be stepped back from Church Lane and the Coastal Change Management Area to take account of coastal change and maintain key landscape and heritage views through siting, scale, massing, materials, vernacular style and design to conserve, and where appropriate enhance the Mundesley Conservation Area and grade II listed All Saints Church;
2. Careful attention to layout and building design to ensure no unacceptable overlooking or overshadowing of properties on Church Lane;
3. Retention and enhancement of existing mature trees and hedgerows which form the sites western boundary;
4. Provision of a convenient and safe access from Cromer Road for land north-east of the designated open space as identified on the Policies Map or, if not feasible, from Church Lane to the satisfaction of the Highway Authority. An additional access should also be provided for land south of the area of designated open space, onto Church Lane;

2 Places & Sites

5. Provision of approximately 0.5ha of designated open space as shown on the Policies Map that incorporates the railway embankment which provides a pedestrian/cycle link between Cromer Road and Church Lane, and connects to a new footway along the site's frontage on Church Lane to All Saints Way;
6. Delivery of multi-functional open space together with measures for its on-going maintenance;
7. Submission, approval and implementation of effective Surface Water Management plan, ensuring that there is no increase of surface water run-off from the site;
8. Enhancements to the sewage network capacity ahead of occupation of dwellings to prevent detriment to the environment and comply with Water Framework Directive obligations; and,
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

3 Small Growth Villages

- 3.0.1** Policy SS1 sets out the spatial strategy for the district and the approach to where new development will be located. The majority of development will be focused through proposed allocations in the **Large Growth Towns** of Cromer, Fakenham and North Walsham, then the **Small Growth Towns** of Holt, Hoveton, Sheringham, Stalham and Wells-next-the-Sea.
- 3.0.2** A smaller percentage of growth is directed to the **Large Growth Villages** of Blakeney, Briston, Ludham and Mundesley. A further proportion of growth is directed through indicative housing allowances for **Small Growth Villages**. Growth in Small Growth Villages will only be permitted where development proposals comply with the policy criteria set out in Policy SS1, criterion 3 of the submitted Plan (as modified).
- 3.0.3** Small Growth Village selection is based around a number of sustainability criteria which is set out and justified in Background Paper 2: Distribution of Growth [examination library ref [C2](#)]. The approach adopted is based around the availability of Key Services, Secondary Services and Desirable Services⁽⁹⁾ in order to help provide for local daily needs.
- 3.0.4** The qualifying criteria for the submitted Local Plan was that a settlement must provide a limited range of services including one Key Service and four of the identified Secondary or Desirable Services. In his initial letter (examination reference EH006(f) - see [Appendix 7](#)), the inspector suggested that in order to bring forward more housing in the Plan period, Small Growth Villages could be expanded to include those settlements with one Key Service and three Secondary or Desirable Services.
- 3.0.5** An addendum to the Background Paper 2: Distribution of Growth [examination library ref [C2](#)] is included at [Appendix 2](#). The addendum supports the Proposed Change below by reviewing, identifying and justifying the 10 additional settlements which qualify for the Small Growth Village category based on the adjusted methodology.

Proposed Change 12

Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)⁽¹⁰⁾

- 3.0.6** Policy SS1 Spatial Strategy is proposed to be amended to incorporate the following Small Growth Villages in addition to the list of 23 selected Small Growth Villages as listed in section 4.1 'Spatial Strategy' of the [Submission Version Local Plan](#):
- Beeston Regis
 - Erpingham
 - Felmingham
 - Great Ryburgh
 - Itteringham
 - Langham
 - Northrepps
 - Stibbard
 - Tunstead
 - Worstead

9 **Key Services:** Primary School, Convenience shopping, GP surgery. **Secondary Services:** Post Office, Other Shopping, Public House/Restaurant, Meeting Place (e.g. Village Hall), Connectivity and public transport (Main Road) **Desirable Services:** Petrol Filling Station, Vehicle Repair Shop, Place of Worship, Employment Land.

10 It is recommended to refer to Section 4.1 'Spatial Strategy' of the Submission Version Local Plan for context.

3 Small Growth Villages

3.0.7 Each village has been assessed for its suitability as a Small Growth Village, and a settlement boundary drawn based on an agreed methodology. The evidence to support this can be found below.

Supporting Evidence

- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'
- 'Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum'

3.0.8 In each identified **Small Growth Village**, rather than allocating specific new development sites, new growth is planned for through an indicative housing allowance which is proportionate to the existing settlement and its size.

3.0.9 The adopted approach allows for sites to come forward on a 'windfall basis', where development proposals are adjacent to the defined settlement boundary, and where they adhere to the other elements of criterion 3 (as modified) in Policy SS1.

Proposed Change 13

Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages

3.0.10 Policy SS1 Spatial Strategy is proposed to be amended to increase the indicative level of housing growth in all Small Growth Villages from 6% to 9%.

3.0.11 The indicative level of growth that this approach could deliver across Small Growth Villages over the adjusted Plan period 2024-2040 is set out below in an updated 'Table 2 Small Growth Villages Housing Apportionment', with the adjusted Indicative Housing Allowance shown in red text, and the additional Small Growth Villages detailed in Proposed Change 12, above, denoted by bold text.

3.0.12 In total, the revised strategy allows for approximately 873 new dwellings across all Small Growth Villages during the period 2024-40.

Settlement (Parish)	Indicative Housing Allowance at 6%	Proposed Indicative Housing Allowance at 9%
Aldborough	15	22
Bacton	31	45
Badersfield (Scottow)	37	35
Beeston Regis	-	43
Binham	8	11
Catfield	27	39
Corpusty & Saxthorpe ⁽¹⁾	19	29
East & West Runton	43 ⁽²⁾	64 ⁽²⁾

Small Growth Villages 3

Settlement (Parish)	Indicative Housing Allowance at 6%	Proposed Indicative Housing Allowance at 9%
Erpingham	-	29
Felmingham	-	23
Great Ryburgh⁽¹⁾	-	26
Happisburgh	24	36
High Kelling	17	20
Horning ⁽³⁾	29	0
Itteringham	-	5
Langham	-	15
Little Snoring	16	24
Little Walsingham (Walsingham)	21	31
Northrepps	-	43
Overstrand	25	38
Potter Heigham ⁽³⁾	0	0
Roughton	24	37
Sculthorpe	20	28
Sea Palling ⁽³⁾	0	0
Southrepps	21	34
Stibbard	-	13
Sutton	30	46
Trunch	24	37
Tunstead	-	42
Walcott ⁽³⁾	0	0
Weybourne	21	20
Worstead	-	38
Total Housing Delivery	452	873

Table 2 Small Growth Villages Housing Apportionment

1. Indicative allowance allocated through adopted Neighbourhood Plan
2. Housing figures in Small Growth Villages are based on the existing housing stock as detailed in available census data. Census data is only available for East & West Runton settlements combined.
3. Indicates that although the settlement has the service and facilities to be considered an infill village, the settlement is environmentally constrained and no growth is relied upon. Settlement referred to as a 'Constrained Small Growth Village'

Supporting Evidence

- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'

3 Small Growth Villages

4 Gypsy, Traveller & Travelling Showpeople's Accommodation

Proposed Change 14

Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'⁽¹¹⁾

The purpose of this policy is to meet, **as a minimum**, the needs for both permanently occupied and transit pitches for the gypsy and traveller communities.

- 4.0.1** The accommodation needs of Gypsies and Travellers should be considered alongside the housing needs of the whole community. Gypsies are protected by the 2010 Equalities Act, and the Council has a duty to seek to eliminate unlawful discrimination and to promote equality of opportunity and good race relations in everything it does.
- 4.0.2** Government policy, through the NPPF, supported by the updated 2023 'Planning Policy for Traveller Sites' (PPTS), requires Local Authorities to identify and meet any identified accommodation needs for Gypsies and Travellers, including households who have ceased to travel temporarily or permanently. It is recognised that the future need in north Norfolk mainly arises from the existing few families already resident in the district and that the location of sites needs to meet the dispersed working and living patterns of Gypsies and Travellers across the rural district and that this may include locations in the Countryside. However it is also important to ensure that locations allow for access to essential services, such as education and health, are not damaging to the character of the area, and foster good community relations and be consistent with the wider sustainable development principles of the Local Plan.
- 4.0.3** In December 2023 the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that the 2015 PPTS was discriminatory by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. In response, the government amended the definition by re-inserting the word 'permanent'. As now set out in the subsequently updated PPTS, December 2023 for the purposes of planning policy, gypsies and travellers means:
- 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'*
- 4.0.4** The PPTS does require the need to assess the accommodation needs of Gypsy and Traveller households who have ceased to travel temporarily or permanently, but only for the reasons due to education or health needs or old age.
- 4.0.5** The updated 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)' provides the accommodation needs based on the updated PPTS 2023 definition and a further figure based on ethnic identity and broader ethnic definition. This approach acknowledges the distinctions between planning definitions under PPTS 2023 and broader cultural identities which includes any economic needs, ensuring that all relevant accommodation needs are considered,

11 It is recommended to refer to section 7.5 'Gypsy, Travellers & Travelling Showpeople's Accommodation' of the [Submission Version Local Plan](#) for context.

4 Gypsy, Traveller & Travelling Showpeople's Accommodation

thereby aligning with legal obligations under the Equality Act to avoid discrimination and promote equality. The study recommends that the Council adopt the 'ethnic' definition of accommodation needs figures, i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers.

- 4.0.6** The assessment identifies that there is an overall accommodation need across North Norfolk between 2024 and 2040 of 11 pitches (ethnic need) and 9 Pitches (PPTA,2023). There is no additional accommodation need for Travelling Showpeople. This need can be broken down as follows:

Period	Ethnic Definition	PPTS 2023 Definition
2024-29	7	5
2029-34	2	2
2034-40	2	2
Total	11	9

Source: North Norfolk Gypsy, Traveller & Travelling Showpeople Accommodation Needs Assessment, September 2024

- 4.0.7** The existing two transit sites which provide for seasonal visits in the east and west of the district provide an additional 20 pitches collectively and are identified as sufficient to address the transient need. The study does however also recommend that outside the Local Plan provision and transient site use a wider corporate approach could be developed to provide additional overnight stoppage through negotiated stopping arrangements.
- 4.0.8** The evidence for North Norfolk, concluded that the future need for permanently occupied pitches mainly arises from the few Gypsy families already resident and dispersed across the district. This is mainly due to the requirement from new households' formation expected to arise from within existing family units. A smaller element of the need for pitches is also derived from households currently residing in bricks and mortar accommodation. As with the existing provision sites are in private individual ownership and dispersed across the district.
- 4.0.9** The policy provides for the accommodation needs of Gypsies and Travellers by setting Criteria, aligned with the PPTS by which windfall planning applications can be approved. This flexible approach to meet the needs of the gypsy and travellers will ensure that at least a further 11 pitches can come forward between 2024 and 2040 but also allow more subject to demand. As detailed in the PPTS, the approach is one that facilitates, wider sustainability principles along with the traditional and nomadic life of travellers while respecting also the interests of the settled community and promotes the peaceful and integrated co – existence between the site and the local community. At the same time the approach ensures both the need to travel and undue pressure on local infrastructure is avoided and services such as health and education can be accessed.
- 4.0.10** In 2017 as part of the Duty to Cooperate the Norfolk Authorities collectively prepared a **Gypsy, Traveller, and Caravan Needs Assessment**⁽¹²⁾. For North Norfolk this concluded that future need for permanently occupied pitches is likely to be very small and mainly arises from the few Gypsy families already resident in the District. Transit pitches for seasonal visits to the District are available at Fakenham and Cromer and have proved to be sufficient to address these needs in the Plan period.
- 4.0.11** In line with national policy, the criteria based policy approach set out in this policy provides the basis for decisions should such applications come forward. The approach is one that facilitates

Gypsy, Traveller & Travelling Showpeople's Accommodation 4

the traditional and nomadic life of travellers while respecting also the interests of the settled community and promotes the peaceful and integrated co-existence between the site and the local community whilst at the same time ensuring both the need to travel and undue pressure on local infrastructure is avoided and services can be accessed.

- 4.0.12** The Planning Policy for Travellers Sites (PPTS, 2015) defines the travelling community as comprising Gypsies, Travellers and Travelling Showpeople. Gypsies and Travellers are defined in the PPTS as '*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such*'. Travelling Showpeople are defined in the PPTS as '*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above*'.
- 4.0.13** In determining whether persons are 'Gypsies and Travellers' for the purposes of this policy, consideration should be given to the following issues amongst other relevant matters:
- whether they previously led a nomadic habit of life;
 - the reasons for ceasing their nomadic habit of life;
 - whether there is an intention to living a nomadic habit of life in the future, and if so, how soon and in what circumstances.
- 4.0.14** In respect of those Gypsies and Travellers who do not lead a nomadic lifestyle, the Council will continue to assess and plan to meet their needs as part of its wider responsibilities to plan to meet the accommodation needs of its settled community

Policy HOU 7

Gypsy, Traveller & Travelling Showpeople's Accommodation

- Development that meets the identified needs of Gypsies and Travellers and of Travelling Showpeople will be permitted. The accommodation needs of the districts Gypsy & Traveller community will be met by the provision of a minimum of 11 permanent pitches. Development will be permitted for new site provision or for the expansion and intensification of existing sites provided that it is of an appropriate scale and nature and that it complies with all of the following criteria:
 - the intended occupants meet the definition of Gypsies and Travellers, or the description of travelling showpeople;⁽¹³⁾⁽¹⁴⁾⁽¹⁵⁾
 - development minimises impact on the surrounding landscape;
 - safe vehicular access to the public highway can be provided and the development can be served by necessary utilities infrastructure;
 - the movement of vehicles to and from the site will not result in any unacceptable impact on the capacity of the highway network;
 - there is adequate space for parking, turning and servicing on site;

13 As defined for the purposes of planning policy in the updated 'Planning Policy for Traveller Sites' (PPTS) 2023, or subsequent updates.

14 As defined for the purposes of planning policy in the Planning Policy for Traveller Sites, DCLG, 2015 and Planning Practice Guidance Paragraph: 001 Reference ID: 67-001-20190722, revision date 22.7.2019

15 As defined for the purposes of planning policy in the Planning Policy for Traveller Sites, DCLG, 2015 and Planning Practice Guidance Paragraph: 001 Reference ID: 67-001-20190722, revision date 22.7.2019

4 Gypsy, Traveller & Travelling Showpeople's Accommodation

- f. the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities;
 - g. suitable landscaping, boundary enclosures and screening are provided to give privacy, minimise impact on the character and amenities of the surrounding area and neighbouring settled community;
 - h. proposals should include any additional uses intended to be carried out from the site.
2. Conditions will be used to control the nature and level of non-residential uses on the site.
 3. **Proposals which result in the loss of existing authorised Gypsy and Traveller sites/yards or pitches/plots will not be supported unless:**
 - a. **it can be demonstrated that there is no longer a need for such accommodation on the relevant site; or,**
 - b. **replacement pitches or plots are provided within the District.**

Supporting Evidence

'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'

Appendix 1: Additional Sites Review Background Paper

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 1: Alternative Sites Review Background Paper

Appendix 2: Distribution of Growth (Small Growth Villages) Addendum

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 2: Distribution of Growth (Small Growth Villages) Addendum

Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum

Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)

Appendix 5: Sustainability Appraisal Addendum

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 5: Sustainability Appraisal Addendum

Appendix 6: Habitat Regulations Assessment Addendum

Please select this [link](#) in order to view the supporting document (the document will download / open in a new window).

Appendix 6: Habitat Regulations Assessment Addendum

Appendix 7: Inspectors Interim Findings Letter & Related Correspondence

North Norfolk Local Plan Examination

Russell Williams
Assistant Director – Planning
North Norfolk District Council
Holt Road
Cromer
NR27 9EN

24 May 2024¹

Dear Mr Williams

NORTH NORFOLK LOCAL PLAN EXAMINATION

1. Following the three weeks of hearings held between January and March, I am now able to advise as to the main soundness issues raised by the plan and to seek the views of the Council as to how they might be addressed. Firstly however can I thank the Council for the arrangements which enabled the hearings to run smoothly and effectively, particularly to Mark Ashwell, the other officers and consultants who explained the plan, to Annette Feeney for all her work behind the scenes as programme officer and to Erika Temple & Charlotte Sandon for their invaluable assistance on sitting days. Can I also thank all the other participants who contributed to the discussions to enable a full and rounded debate to take place.
2. I am also grateful for the work carried out since the hearings to update and clarify various matters, particularly for the latest standard method calculation dated 26 April 2024 (document EH009(a)(i)) and the housing trajectory dated 2 May 2024 (EH013(I)) **which sets out the Council's latest position** regarding housing provision. These form key inputs to this letter.
3. Having taken full account of all the background evidence and representations submitted to date together with the hearing discussions, the main concerns relating to soundness that are relevant at this stage are set out in this letter. In addition, there are a number of other soundness issues but these could be corrected relatively simply in due course by modifications to the plan and will be the subject of a further letter.
4. This letter deals in turn with the plan period, local housing need and the housing requirement, the housing provision being made in the plan and its timing, employment provision and finally the policy for gypsy, traveller and travelling showpeople's accommodation, before bringing together the implications of these findings for the next stages of the examination.

¹ Not released until 19 July 2024 due to the general election.

Duty to Co-operate and Legal Requirements

5. I am satisfied that the Council has met the duty to co-operate and other legal requirements relating to plan preparation.

Plan Period

6. No doubt due to its lengthy preparation process, the submitted plan covers a twenty-year period from 2016 to 2036. At present, there are only 12 years of the plan period remaining, and once the further steps necessary to ensure a sound plan have been taken, it is likely to be nearer to 11 years. The National Planning Policy Framework (NPPF) states in paragraph 22² that strategic policies should look ahead a minimum 15 years from adoption, and to be consistent with this the plan period should be extended to 31 March 2040 to allow for adoption during the next 12 months. Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024. The plan period should therefore be 2024-40. The latest housing monitoring data for permissions and projected completions reflect the position at 1 April 2023 but these are sufficiently up to date for local plan preparation purposes.

Local Housing Need

7. The NPPF states in paragraph 61 that the minimum number of homes needed in the district should be determined by using the standard method set out in Planning Practice Guidance (PPG) unless exceptional circumstances justify an alternative approach. The standard method takes the 2014 based household projections as the demographic starting point to which an affordability uplift is applied and the figure potentially capped to limit any increase. However, the Council have used the lower 2016 based household projections for this exercise, which after the uplift and a 5% adjustment leads to a local housing need of 480 dwellings per annum (dpa) over the plan period 2016-2036, a total of 9,600 dwellings. The Council argues that there were significant errors in the 2014 based projections for the district that were corrected in the 2016 based projections. The latter are therefore more robust and should be used for the housing need calculation.
8. However, using the 2016 or more up to date 2018 based projection would be in direct conflict with national policy. PPG states that the 2014 projections should be used to provide stability, to ensure historic under-delivery and declining affordability are addressed, and to boost significantly the supply of homes. Where an alternative approach results in a lower housing need figure, as here, there need to be exceptional *local* circumstances that justify departing from the standard method. The PPG is also clear that whilst any alternative approach should be based on realistic assumptions, more recent

² Throughout this letter, NPPF paragraph numbers relate to the September 2023 NPPF which is the relevant version for the purposes of this examination.

household projections are not appropriate for use in what would otherwise be the standard method³.

9. The **Council's** objection to the 2014 based household projections is that for North Norfolk they project forward a significantly higher rate of growth than was subsequently shown to have actually happened. The projections are derived from the mid-year population estimates which suggested an increase in population of 6,000 people between 2001-11. However, the 2011 census showed the increase was actually only 3,200 people. **The 'unattributable population change'** (UPC) of minus 2,800 people was almost certainly due to net in-migration being over-estimated, figures for births and deaths being broadly accurate. The 2014 based projections build in this over-estimate, taking no account of UPC, whereas the error was corrected in the 2016 based estimates resulting in a significantly lower projection for the district.
10. The existence of a UPC factor in the case of the North Norfolk projection is not disputed, the issue is whether this constitutes exceptional circumstances that justify a departure from the standard method which in any event is only intended to identify a minimum figure. All local authorities were affected by UPC to some extent, and 25 outside London were subject to a higher over-estimate of population growth than North Norfolk in percentage terms. Whilst UPC discrepancies have been taken into account in a small number of planning appeals when determining housing land supply, including in North Norfolk, no examples have been provided of this issue being put forward by Councils or accepted by Inspectors when examining development plans. National policy could have been updated to adopt the 2016 or 2018 based household projections for use in the standard method but instead PPG specifically precludes their use as set out above. The issue was the subject of a technical consultation when it was decided that later projections could not be used to justify lower housing need⁴. Despite **the Council's** concerns about their accuracy, however valid, the 2014 based projections are to be used to support the objective of boosting housing supply.
11. In conclusion, the UPC discrepancy does not amount to an exceptional local circumstance that justifies a departure from the standard method in North Norfolk. The discrepancy is not such an extreme outlier nor a specific local factor, and although use of the standard method leads to a significantly higher local housing need figure, this reflects national policy. Furthermore, there is no obvious reason why housing provision in the district should be unnecessarily restricted.

³ PPG paragraphs 2a-005-20190220 and 2a-015-20190220

⁴ Technical consultation on updates to national planning policy and guidance, October 2018, and Government response to the technical consultation, February 2019.

12. Having concluded that the standard method should be followed instead of the **Council's** bespoke method, the latest available information should be used to derive the most up to date housing need figure for the district. With the latest affordability ratio published in March, it is possible to derive the local housing need figure as follows:

2014 based household projection for 2024-34	391 dpa
Latest affordability ratio 10.80 so uplift	1.425
Local Housing Need 2024-34	557 dpa ⁵
Local Housing Need 2024-40 (16 years)	8,900 dwellings

13. The local housing need methodology takes account of any previous over or under supply, so there is no shortfall or surplus arising pre 2024 to add to this figure.

Housing Requirement

14. The housing requirement to be delivered by the plan should be the same as the local housing need figure as there is no justification to increase the figure to accommodate an employment led approach or to meet the unmet needs of a neighbouring authority, nor to reduce the figure as a result of significant environmental or other constraints that mean the need cannot reasonably be met within the district.

Five Year Housing Land Requirement

15. Paragraph 68 of the NPPF requires the plan to identify a supply of specific, deliverable sites for the first five years. With adoption likely by April 2025, the plan should identify a suitable supply for the period 2025-2030. With a 5% buffer⁶, this should be at least $557 \times 5 + 5\% = 2,925$ dwellings, plus any shortfall from 2024/25.

Spatial Strategy and Site Selection

16. The spatial strategy of the plan (Policy SS1) is based on a settlement hierarchy with five tiers – Large Growth Towns (Cromer, North Walsham and Fakenham), five Small Growth Towns, four Large Growth Villages, 22 Small Growth Villages and Countryside. For sustainability and accessibility reasons the plan aims to direct the majority of growth towards the larger towns with successively lower levels of growth in the case of the lower tiers with fewer services and facilities. This is a justified approach. The methodology for arriving at the hierarchy is set out in Background Paper 2 (C2) and the site selection methodology in Background Paper 6 (C6); neither were subject to serious dispute at the hearings. The apportionment of growth to the towns and large growth villages is not however prescriptive and site allocations are made on a detailed assessment of promoted sites for their availability and suitability. The results of this exercise are set out in the site assessment

⁵ The figure is uncapped as it is below 560 dpa

⁶ NPPF Paragraph 74

booklets for each individual settlement (D1-D12) and the conclusions are supported by the evidence unless stated otherwise below.

Overall Housing Provision in the Plan

17. During the plan period, housing would be provided in the following ways which are discussed in turn:
 - (i) allocations being made in the plan
 - (ii) the small growth village policy
 - (iii) large and small sites with planning permission as at April 2023
 - (iv) windfall sites that arise during the plan period
- (i) Allocations being made in the plan
18. The plan proposes a series of allocations which were selected using the process described above. With the exceptions set out below, the allocations are justified by the evidence and suitable for inclusion in the plan. In relation to the timing of development on these sites, **the Council's** latest trajectory (EH013(I)) acknowledges slippage in some cases from that expected in the submission plan. However, the trajectory still appears unduly optimistic in the case of the two large allocations at North Walsham and Fakenham and this has significant implications for housing delivery in the plan period. My conclusions in this respect are also explained below.

North Walsham

19. North Walsham is a large growth town without significant environmental or landscape constraints and has been correctly identified as suitable for large scale development in the plan. There are however a number of highway concerns affecting key junctions and some residential roads caused by the nature of the road network, three low railway bridges and the location of the main industrial area to the north of the town. Without improvement, major development would exacerbate these issues and the strategy to concentrate growth to the west of the town in conjunction with a new western link road (WLR) is a well evidenced response.
20. The plan as submitted proposes a WLR linking Norwich Road, Cromer Road and the industrial estate in conjunction with the allocation of Site NW62/A (Land West of North Walsham) for mixed use including 2,000 dwellings⁷. However, the transport assessment dated November 2023 (EX017/EX018) concludes that a northern extension of the WLR over the railway line to the industrial estate is not necessary to mitigate the traffic impacts of the development. Such an extension would in any event involve major road widening/new construction and potentially a new railway bridge, with serious implications for scheme viability. In addition, the extension would encourage heavy goods vehicles (HGV) from the industrial estate to use the Norwich Road (B1150), increasing HGV flows on a sub-optimal route through the villages of Coltishall and Horstead.

⁷ 1,800 dwellings and elderly accommodation totalling 200 dwelling equivalents.

21. The Council therefore seek a modification to the plan to reduce the WLR to a link between Norwich Road and Cromer Road, with any northern extension a matter for the future. Whilst a shorter WLR would reduce its benefit to the town, with many HGV movements to and from the industrial estate still needing to pass through the town centre and along the residential Aylsham Road, the extension is effectively undeliverable at this time.
22. With this modification the potential access arrangements for a small part of the allocation to the north of the railway line are unclear. Intended to facilitate the WLR extension to the industrial estate, without the extension this area would comprise an isolated area of housing development, poorly related to the town and an unjustified intrusion into the countryside. This part of the allocation should therefore be deleted from the plan. This would not significantly affect the 2,000 dwelling capacity of the allocation.
23. The 2.4 ha employment allocation Land East of Bradfield Road (NW52) is also intended to facilitate a link from the industrial estate to the WLR and without it would undesirably increase HGV movements through the town. The site is not essential for employment purposes in the plan period as explained in paragraphs 50-53 below and would encroach into the countryside to the north-west of the town. The site should therefore be deleted from the plan pending consideration of any northern extension of the WLR in the future.
24. The timing of the development west of the town is not clear at this stage. Although much preparatory work has been done, the overall scheme is complex, with two roundabouts needed to gain access to the initial phases, off-site highway improvements, some before construction can commence in earnest, and much legal and technical work required. **The consortium's** evidence on timing has been inconsistent, indicating the situation is still fluid, and only a 'high level' Gantt chart with little detail has been produced. It is intended to submit an outline planning application in Summer 2024 with approval anticipated by the end of 2025, after which reserved matters, technical approvals and early site works will be required before house construction can commence. The viability assessment allows two years for these processes, to the end of 2027, and then 9 months until the first house completions in 2028/29. The plan as submitted assumed completions would commence in 2026/27 whilst the latest schedule indicates slippage of a year to 2027/28. However, the current level of uncertainty and clear scope for delay suggests 2028/29 for the first completions is more likely, slippage of two years from the submitted plan. Indeed, this is still optimistic in the light of the findings of the Lichfields Start to Finish research.
25. In terms of anticipated completion rates, the development will overlap with the build out of Site NW01/B (Land at Norwich Road & Nursery Drive), a more straightforward site with hybrid planning permission due to be issued shortly. House completions and a care home on this site from 2026/27 to 2033/34 are likely to compete with those coming forward on NW62/A. The completion rate provided at the hearing of an average of 100 dpa based on two outlets, with periodic tranches of elderly accommodation, as originally put forward in the submitted plan, is thus more realistic than the overly

optimistic and widely fluctuating profile of completions in the latest schedule. The plan should therefore assume the trajectory in the submitted plan but delayed by two years. The upshot of this is the provision of about 1,270 dwellings on the site during the plan period instead of the 1,596 shown on the **Council's** latest schedule, a reduction of 326.

Fakenham

26. Significant development was proposed for Fakenham, another large growth town, when 85 ha of primarily agricultural land north of Rudham Stile Lane **was allocated in the Council's Site Allocations DPD adopted in 2011. Progress** in delivering the main site however has been slow, with a development brief approved in 2015 and outline planning permission for up to 950 dwellings on the area east of Water Moor Lane only granted in 2021 following a four-year determination period. Several reserved matters still remain to be resolved, the means to address the nutrient neutrality issue that emerged in 2022 are not yet fully identified, and no developer is currently in place. As a result, the latest trajectory assumes the scheme will start to deliver completions in 2027/28, three years later than the 2024/25 date in the plan as submitted. Completions are projected to rise to an average of 100 pa from two outlets. Whilst many steps still need to be taken, this should be achievable.
27. Whilst the site east of Water Moor Lane is thus a commitment, that to the west has no planning permission in place and consequently is reallocated in the local plan as Site F01/B (Land North of Rudham Stile Lane) for about 627 dwellings⁸. The site is in effect a continuation of that to the east and for the most part is in the hands of the same institutional landowner. The strategy for development of the allocation forms part of that drawn up for the wider site and there is little doubt that the necessary applications will be made in due course to enable the full site to be built out. However, the delays so far will have a knock-on effect on the timing of completions.
28. Whilst there may be some overlap between the development of the land east and west of Water Moor Lane the sites would be in direct competition. The plan as submitted assumed that building on the land to the west would pick up as that to the east winds down, the most likely scenario. However, the **Council's latest trajectory** for delivery of the site is the same as that in the submitted plan, with no allowance for slippage. There is no evidence for this, and delivery in parallel of up to 200 or so dwellings a year is unlikely. A more realistic assumption is that building on the land to the west would be delayed by three years from the date assumed in the submitted plan, like that to the east. Completions from both sites together would then peak at a maximum of 150 in a single year. This would mean Site F01/B starting delivery in 2035/36 with the profile then as in the submitted plan. The upshot of this is the provision of about 327 dwellings on the site during the plan period (plus 950 on the site to the east) instead of the 627 shown on **the Council's** schedule, a reduction of 300.

⁸ 560 dwellings and elderly accommodation totalling 67 dwelling equivalents.

Cromer

29. The plan as submitted allocates three sites in Cromer, the third large growth town. Two lie in the Norfolk Coast National Landscape (formerly Area of Outstanding Natural Beauty), the Former Golf Practice Ground, Overstrand Road (C16) for 150 dwellings and Land West of Pine Tree Farm (C22/2) for 400 dwellings plus an element of elderly accommodation in each case. Whilst major developments in relation to Cromer the requirement for growth to meet local housing need **and the town's** position in the settlement hierarchy constitute exceptional circumstances to justify the developments in the public interest. However, a further site outside the National Landscape, Land at Runton Road/Clifton Park was proposed as an allocation for 90 dwellings in the 2019 draft plan but was not carried forward into the submitted plan. The merits of this site should clearly be reconsidered as one of the options under paragraph 48(i) below. Site CO7/2 (Land at Cromer High Station) has been allocated since 2011 without development coming forward and in the circumstances none should be assumed in this plan period.

Wells

30. Wells lies within the Norfolk Coast National Landscape, but as a small growth town with particularly high house prices and second/holiday home ownership, there are exceptional circumstances that justify further housing development in the public interest where suitable sites are available. The submitted plan allocates two sites, with Site W01/1 (Land South of Ashburton Close) forming a natural extension to the Home Piece Road estate, a recent scheme which demonstrates how the town can acceptably expand away from the front.
31. However, the second allocation, Site W07/1 (Land adjacent Holkham Road) lies on the coastal side of the ridge which extends to the west of the town. The site comprises the top section of a grassed field which rises from the B1105 Holkham Road at about sea level up to the 20 m contour and the rear gardens of the houses fronting Mill Road on the ridge. The site enjoys wide views to the north over the Wells salt marshes, harbour, Holkham Meals and reclaimed farmland as far as **Lady Ann's Drive**, but the corollary of this exposed position is the impact that housing development on the site would have on this sensitive and nationally defined heritage coast landscape.
32. The site is well screened from Holkham Road by the roadside hedgerow but is clearly seen in intermittent long-distance views from the North Norfolk Coast **Path from the café at the end of Lady Ann's Drive to Wells beach car park**, and most seriously in ever closer views when approaching the town along the top of the Beach Road embankment, a heavily used route which also forms part of the long distance path. The scheme would also be intrusive when seen from the Wells Town football ground and overflow car park area. Whilst the houses along Mill Road would lie behind the development on the skyline, the trees within and at the back of their long rear gardens do much to mitigate their impact. By contrast, a new development of 50 dwellings along

the top of the field, however well designed and landscaped on its northern edge, would appear raw and intrusive in the landscape for many years.

33. The site itself lies just within the Rolling Open Farmland landscape character type (LCT)⁹ but is heavily influenced by its position overlooking the Drained Coastal Marshes and Open Coastal Marshes LCTs. Contrary to the landscape guidance for these LCTs the proposed allocation would consolidate a form of linear sprawl along the undeveloped coast, intrude into views inland from the coastal marshes, detracting from their naturalistic nature and reducing their relative tranquillity and remoteness, including at night when additional light sources on the ridge would erode the dark night sky.
34. The proposed access to the site from Mill Road, cutting across an attractive grass paddock in front of the Mill Farm buildings and adjacent to Nos 106-110, would also be an unduly intrusive feature. It would be poorly related to the housing estate behind, an odd entrance to the scheme, both spoiling the existing paddock and urbanising the A149 western approach to the town.
35. For these reasons the evidence base supporting the allocation is flawed. In particular, the landscape impact assessment under the site selection methodology should be red – the landscape impact on a sensitive landscape cannot be mitigated – rather than amber – mitigation would be possible. There is no clear physical boundary on the ground to distinguish this site from the larger site W07 of which it forms part, and which has rightly been assessed as unsuitable for development. The allocation of Site W07/1 is not justified and thus it should be deleted from the plan.

Sheringham

36. Full planning permission has been granted and construction is well underway on Site SH07 (Former allotments, Weybourne Road, adjacent to The Reef). The allocation should now be deleted from the plan.

Hoveton

37. In the case of Site HV01/B (Land East of Tunstead Road), the Council are proposing that the allocation as submitted should be extended to the north with the site capacity increased from 120 to 150 dwellings plus elderly accommodation. Although there was some discussion about the larger site at the hearings, the extension proposal has not been subject to full public consultation, and this should be carried out as part of the process outlined in paragraph 58 below.

Ludham

38. Site LUD06/A (Land at Eastern End of Grange Road) has been allocated since 2011 with no development coming forward. The access is constrained by the presence of preserved trees with no evidence this can be overcome. The allocation should therefore be deleted from the plan.

⁹ As defined by the North Norfolk Landscape Character Assessment SPD January 2021

(ii) The Small Growth Villages Policy

39. The strategy in Policy SS1 and set out in Appendix 4 relating to Small Growth Villages is not justified or effective as submitted. Whilst it is potentially a sound approach to specify an acceptable percentage growth figure for such settlements rather than to allocate sites in the plan, the approach is inherently uncertain and brings significant disadvantages both for the communities concerned and other interested parties. However, there are precedents for such an approach (eg Breckland Local Plan Policy HOU04) and should the Council wish to pursue it, some modifications would be required.

40. In particular, these are:

- the stipulation that no further permissions will be granted after the village 'allowance' is reached is arbitrary and not justified. The policy should be reworded to allow 'not significantly more than' a 6% increase in dwellings.
- there is no justification for an arbitrary quantitative limit on new dwelling provision within the defined settlement boundaries at any time.
- criterion (e) should be deleted as there is no justification for small sites to incorporate substantial community benefits. Any requirements to make the development acceptable can be secured under Policy HC4.
- criterion (f) is not justified as currently worded and would render the policy ineffective by causing uncertainty and acting to deter schemes coming forward¹⁰. The criterion could however be reworded to state that suitable schemes proposed in partnership with a registered social landlord that would deliver affordable housing in excess of the normal Policy HOU2 requirement will receive particularly favourable consideration.
- **Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance (31 in the revised list in document A5.11) set at 0 as there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future. This is due to unstable ground conditions and a permanently high water table leading to groundwater infiltration of the sewerage network for which no solutions have yet been identified.**

41. The total provision from this source over the plan period should therefore be reduced from 453 to 422 dwellings starting in 2027/28 as the policy only commences on adoption of the plan. However, there is considerable scope for widening the policy as explained in paragraph 48 below.

¹⁰ Breckland Local Plan Policy HOU04 does not contain such a criterion.

(iii) Large and Small Sites with Planning Permission as at April 2023

42. **The Council's** monitoring of sites with planning permission as at April 2023 indicates 1,646 dwellings are likely to come forward during the plan period 2024-40 on large sites of over 10 dwellings (950 of these on the site north of Rudham Stile Lane at Fakenham) and 441 on small sites. These figures allow for a non-implementation rate.

(iv) Windfall sites that arise during the plan period

43. The submitted plan was based on April 2021 monitoring data and assumed that previously unidentified windfall sites would start to contribute housing completions just one year later, in 2022/23. However, the latest trajectory, with planning permissions recorded as at April 2023, assumes a two-year gap with windfall sites making a contribution from 2025/26. This is a reasonable assumption. The likely contribution from this source can only ever be an estimate, with the submitted plan assuming 135 dpa, a cautious figure well below the historic average of 295 dpa which came forward from windfall sites during the period 2016-23. It should be noted that under Policy SS1 windfall sites in 22 small growth villages will now count towards a separate total.

44. In the letter dated 25 March 2024 (EH013(k)) the Council propose that the windfall allowance for the period 2029/30 to 2039/40 should be increased to 180 dpa, an additional contribution of 495 dwellings over the plan period. This is considered in paragraph 47 below.

Overall Housing Provision in relation to the Requirement

45. With the adjustments set out above, the overall conclusion is that the plan would provide about 8,212 dwellings over the plan period 2024-40 towards the overall requirement of 8,900, a shortfall of about 700 dwellings. In relation to housing land supply for the five-year period 2025-30, the plan would provide about 2,893 dwellings compared to a requirement of 2,925 dwellings. When the shortfall from 2024/25 is added, this would amount to a significant undersupply and there would be no allowance for any unforeseen contingencies.

Housing Provision – Way Forward

46. Unfortunately, for the reasons set out above, the plan does not at present provide sufficient housing to meet the housing needs of the district over the full plan period, with a projected shortfall in both the early and later years. There is an initial five-year housing land supply shortfall. Furthermore, should the planned allocations or other sites not come forward as currently anticipated, which is quite possible, the shortfall in the early years would increase. A standard plan review after five years would not address this early-years issue, although it could bring forward further land later in the plan period if necessary. I am not therefore able to conclude at present that the plan is positively prepared, meeting the objectively assessed needs of the district, one of the tests of soundness in paragraph 35 of the NPPF.

47. The shortfall is about 700 dwellings, but this allows no contingency for unforeseen events such as further slippage of the large allocations, the non-implementation of smaller allocations, the small growth villages policy not working as intended or insufficient windfall sites coming forward. The need for schemes to deliver nutrient neutrality in much of the district, with solutions still uncertain at the time of writing, is a factor here. Therefore, as matters currently stand, the provision made by the submitted plan should be increased by at least 1,000 dwellings to allow some flexibility. I do however agree that in North Norfolk with its numerous settlements and extensive countryside there is enough scope for windfall sites to come forward that the **Council's revised estimate of** an additional 495 dwellings from this source over the plan period can go some way to filling the gap.
48. However, excessive reliance on unspecified windfall sites adds uncertainty to the plan and more concrete steps need to be taken to bring forward more housing in the plan period, particularly in the early years. The options available include, and there may be others:
- (i) Additional or extended allocations in large and small growth towns and large growth villages in accordance with the spatial strategy and settlement hierarchy of the plan. Whilst further sites in Fakenham and North Walsham should not be ruled out, they may divert some demand from the large-scale developments already proposed for these towns.
 - (ii) Increasing the expansion of small growth villages above 6%.
 - (iii) Expansion of the list of small growth villages to include those with a single key service or (say) three secondary/desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not currently included.
 - (iv) Inclusion of a new policy allowing sensitive infilling and rounding off in small villages and hamlets without a settlement boundary (Breckland Local Plan Policy HOU05 is an example in an area with a similarly dispersed settlement pattern). Alternatively, settlement boundaries could be defined but without any provision for development beyond the boundary.
 - (v) If the allocation in the Wells Neighbourhood Plan at Two Furlongs Hill is included in the finalised plan the proposed 45 dwellings could be included in the future supply.
49. Policy support for (ii) – (iv) above is provided by paragraph 79 of the NPPF which advises that housing should be located to enhance or maintain the vitality of rural communities, opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may **support services in a village nearby**. **As submitted the plan's policies** for smaller villages, even some with key services, are unusually restrictive.

Employment Land

50. Whilst much of the employment in the district lies in other sectors, with jobs in food/accommodation, agriculture and retail above the regional average, it is important to provide and protect an adequate supply of employment land for industrial and other businesses to develop and thrive. To secure this, Policy E1 in the submitted plan seeks to allocate 200 ha of existing, 54 ha of undeveloped and 16 ha of new employment land in the various settlements across the district, 271 ha in all¹¹. There is much redevelopment of existing employment land as the needs of individual businesses change, but the scope for 70 ha of new development is more than sufficient to accommodate the most optimistic projection for a take up of 40 ha during the submitted plan period 2016-36. Other projections indicate that the realistic requirement is in fact much less, perhaps as low as 6.5 ha.
51. Unfortunately, the owner of the proposed 6 ha employment allocation at Heath Farm, Holt (Site H27/1) does not now wish to pursue development, and as explained in paragraph 23, the 2.4 ha allocation east of Bradfield Road, North Walsham (Site NW52) should also be deleted from the plan. However, even with 8.4 ha less provision for new development and a plan period extended by four years to 2040, there would still be sufficient land being made available to meet the likely need.
52. This is particularly the case as it is proposed to amend Policy E3 to allow scope for employment development outside designated areas if no suitable land is available within them. In addition, Policy E3 could include support for alternative proposals to come forward in Holt if suitable sites become available, as the withdrawal of the allocation results in a lack of employment land options in the town.
53. Overall therefore, there are no significant soundness issues in relation to the provision of employment land in the plan.

Gypsy, traveller and **travelling showpeople's** accommodation

54. Policy HOU5 seeks to meet the accommodation needs of gypsies, travellers and travelling showpeople in the district with a criteria-based policy on the basis that the latest needs assessment demonstrates that the requirement for further sites is likely to be very small. However, that assessment¹² is based on seven-year old fieldwork with its most accurate projections of need relating to the five-year period 2017-22.
55. With the passage of time the evidence base of the plan is not now sufficiently robust to assess future need in order to set pitch/plot targets in accordance with paragraph 9 of the Planning Policy for Traveller Sites¹³, nor, if necessary, to identify a supply of sites in accordance with paragraphs 10-11. The

¹¹ Corrected figures, the new allocation at Stalham is 1 ha

¹² Norfolk Caravans and Houseboats Accommodation Needs Assessment including for Gypsies, Travellers and Travelling Show People, RRR Consultancy Ltd, October 2017

¹³ December 2023 version

existing assessment also pre-dates the change in the definition of gypsies, travellers and travelling showpeople made in December 2023.

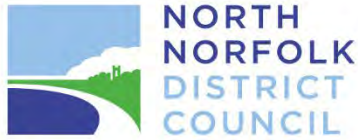
56. In order to ensure the plan is sound, the Council should therefore commission an updated study to assess need in accordance with latest best practice and then to consider what steps might need to be taken to address its findings in the plan, including if necessary proposing allocations or amending the criteria in Policy HOU5.

Conclusion

57. Whilst the Council may be disappointed that it is not possible to move directly to the main modifications stage, there is a clear way forward for the plan if the shortfall in housing provision is addressed together with any implications of an up to date accommodation assessment for gypsies, travellers and travelling showpeople.
58. The Council will no doubt wish to take some time to consider how to address the housing provision issue. Please keep me informed of progress. In due course I should be advised of the suggested changes to the submitted plan to ensure they have the potential to overcome the soundness issue, after which the Council should carry out a six-week public consultation exercise on those changes. Assuming the Council wish to proceed in the light of the response, any representations made would be treated as representations on the local plan and would be considered as part of any future resumed hearings that may be necessary.
59. In due course I would be grateful for a formal response to this letter setting out how the Council wish to proceed and the anticipated timetable for the work that is necessary.
60. This letter should be placed on the examination website for information. I will ask the programme officer to inform hearing participants when it is published but I am not inviting or accepting submissions from other parties at this stage.

David Reed

INSPECTOR



16 August 2024

Mr David Reed
Planning Inspector
c/o Mrs Annette Feeney
North Norfolk Local Plan Examination Programme Officer
Sent via email

Dear Mr Reed,

NORTH NORFOLK LOCAL PLAN EXAMINATION

Thank you for your post-hearings letter of 24 May 2024 (received 22 July 2024), which sets out your initial findings of the main soundness issues and a number of options to address these.

The Council appreciates and is pleased with the positive view that there is a clear way forward for the Plan if the shortfall in housing provision is addressed together with any implications of an up-to-date accommodation assessment for gypsies, travellers and travelling showpeople.

In your letter you requested a formal response, setting out how the Council wishes to proceed and the anticipated timetable for undertaking the necessary work. Accordingly, the Council can advise the below broad actions to address the main soundness issues raised.

An action plan and anticipated timetable are included at the end of this letter.

Plan Period

The Council agrees to adjusting the plan period from 2016-36 to 2024-40.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

It is understood that the latest housing monitoring data for permissions and projected completions which reflect the position at 1 April 2023 are considered to be sufficiently up to date as the base housing monitoring date for local plan preparation purposes, and as such will not be revisited.

Local Housing Need

The Council is disappointed with the stance taken and justification given on the calculation of local housing need, however, accepts the direction that, for the purposes of preparing this Local Plan, the standard method for calculating local housing need with 2014-based household projections is to be followed instead of the Council's proposed alternative method.

Action: This change will result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

The Inspector concluded that the Unattributable Population Change (UPC) discrepancy does not amount to exceptional local circumstances that justify a departure from the standard method and 2014 based projections.

The implications of this, is a housing need of 8,900 dwellings over the new Plan period 2024-40 and an annual requirement of 557 dwellings per annum - an increase of 77 dpa.

It should be noted that the Council maintains the 2014 based projections do not provide an accurate assessment of future household growth in this local area as they project significantly higher population growth from inward migration than what has been proven to have occurred, referred to as 'Unattributable Population Change' (UPC). It is also considered that the lack of other examples strengthens rather than weakens its argument that these are exceptional local circumstances that justify the use of an alternative methodology.

The Council's alternative approach uses more recent official projections to provide robust assessment that *"reflects current and future demographic trends"* as required by the Framework. It then uses the same approach as the standard method to reflect *"market signals"*. The use of the Council's alternative method was intended to provide an accurate assessment of need to enable it to properly plan for and support the objective of boosting housing supply.

Notwithstanding the Council's opinion on this matter, it is nevertheless, keen to address the concerns raised and to undertake the adjustments considered necessary as set out, to calculate and plan for the most up-to date housing need figure for the district. The Council does not want to unnecessarily delay the Plan and in taking a pragmatic stance considers that this is achievable as set out below in a reasonable time period.

Five Year Housing Land Supply

The Council agrees that the plan should identify a suitable supply for the period 2025-2030 as set out in Paragraph 15 of the May 24 Letter. The Plan should identify a suitable supply for the 2025-2030 period incorporating a 5% buffer. This should be at least $557 \times 5 + 5\% = 2,925$ dwelling plus any shortfall from 2024-25.

Action: This change will result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

Allocations being made in the Plan

CROMER

Land at Cromer High Station, Norwich Road (C07/2)

The Council agrees that no dwelling completions should be assumed for this site during the plan period 2024-40.

Action: The latest trajectory (EH013 (I)) has already been updated to reflect that zero dwellings are project within the Plan period. This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

Land at Clifton Park (C10/1)

The Council agrees to reconsider the merits of Land at Runton Road/Clifton Park as one of the options under paragraph 48 (i) in the letter.

Action: Subject to member endorsement, this change will result in a proposed Main Modification to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

FAKENHAM

Land North of Rudham Stile Lane (F01/B)

The Council accepts that the delivery schedule for F01/B should show delivery starting in 2035/6 with the delivery profile then the same as the submitted Plan (January 2022).

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

Examination Library document EH013(I) projects first dwelling completions on the site in 2032/33. It is understood that the implications of moving the delivery schedule back by three years to 2035/36 results in 327 dwellings being delivered within the Plan period - a reduction of 300 dwellings.

NORTH WALSHAM

Land West of North Walsham (NW62/A)

The Council accepts that the delivery schedule for NW62/A should show delivery starting in 2028/29 with the delivery profile then the same as the submitted Plan (January 2022).

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The submitted Local Plan trajectory timeline for North Walsham West (page 267) has been used as it is concluded to be a more realistic projection of likely delivery than the position set out in examination document EH013(I).

It is understood that the implications of moving the delivery schedule back by two years to 2028/29 results in 1,270 dwellings being delivered within the Plan period - a reduction of 326 dwellings.

The Council agrees that delivery of an extension of the proposed Western Link Road over the railway line is shown to be undeliverable at this time and is not necessary to mitigate the wider traffic impacts of the development.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The Council agrees to remove a small part of the allocation north of the railway and that this does not materially affect the overall dwelling capacity of NW62/A.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

Land East of Bradfield Road (NW52)

The Council accepts that the 2.4-hectare employment allocation should be deleted from the Plan pending consideration of any northern extension of the Western Link Road in the future.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

WELLS-NEXT-THE-SEA

Land Adjacent Holkham Road

The Council is disappointed with the conclusion to delete the site based on landscape impacts.

Action: This change would result in a proposed Main Modification to the Plan which would potentially be subject to future public consultation. However, the Council supports the retention of the site as an allocation. It should be noted that a planning application has since the initial hearing sessions been submitted to the Council and as such the site may in any case benefit from a granted planning permission in due course.

The Council notes the issues raised but has concerns around the justification offered for deletion of the site. The application planning statement states that *“the proposed scheme has evolved in response to feedback received during detailed pre-application consultation with North Norfolk District Council, Wells-next-the-Sea Town Council and local residents. The result is a scheme that is tailored to meet local needs, respect the character of the area and the amenity of local residents”*. The application is also supported by a further independent landscape visibility impact assessment which along with evidence put forward by the Local Plan team, the

Wells Np steering group and the promoters through The Landscape Partnership conclude that the site can be mitigated. The site sits outside the Heritage Coast and it is considered that the site would appear as a natural extension to the settlement which could be carefully designed to minimise any adverse effect on the wider landscape through the use of (but not limited to) bungalows to reduce sale, buffer zone on the ridge and increased planting and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area.

In addition, there are considerable material considerations as detailed through the Hearing sessions in the form of a bespoke housing approach designed to address the very specific local circumstances of Wells-Next-The-Sea. The approach agreed with the promoters, Wells Town Council and the Council and could be included in any site allocation policy achieves a mix of dwellings on the site that would help meet the unique and critical needs of the local community. The approach consists of 45% affordable dwellings and a further 10% for private rent to local people which is seen as beneficial in order to help replenish a diminishing resource due to the demand for holiday lets in the area. The remaining (21) dwellings would be for private sale. The site is also capable of being delivered in the first five years of the Plan period.

SHERINGHAM

Former Allotments, Weybourne Road, Adjacent The Reef

The Council agrees to remove the allocation, which has full planning permission and is currently nearing completion.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

HOVETON

The Council agrees to consult on the proposed extension of the site, as proposed during the earlier hearings.

Action: This change will result in a proposed Main Modification to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

LUDHAM

The Council agrees to remove the allocation due to access constraints.

Action: This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The Small Growth Villages Policy

The Council agrees to the actions set out in the first three bullet points as set out in paragraph 40.

Action: This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The Council agrees (in relation to para 40 bullet, point 4 of your letter) that modification is required to criterion 3(f) of Policy SS1.

Action: Could it be clarified if one of the below proposed replacement criteria is suitable? This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The Council has already proposed modifications (including PMIN/SS1/02 and through the earlier Hearings) to criterion 3(f) of Policy SS1 as follows:

f. In the case of sites in excess of 0.5 hectares, the site, together with any adjacent developable land⁽²⁾, has first been offered to local Registered Providers⁽³⁾ on agreed terms⁽⁴⁾, which would allow its development for affordable homes, and such an offer has been declined.

2. 'adjacent developable land' relates to land all in the same ownership.
3. 'local Registered Providers' that are active in the area.
4. 'agreed terms' relates to the terms agreed with the Local Authority.

Alternative wording could be considered, more in line with the suggested wording set out in the May 24th letter which also reflects the reality and priorities around the delivery of exceptions sites in North Norfolk, as set out below:

f. suitable schemes proposed in partnership with a Registered Provider that deliver a minimum of 50% affordable housing would receive favourable consideration.

The reasons for this, is that the purpose of criterion 3(f) of Policy SS1 stems from the need to align the Small Growth Villages approach with Policy HOU3: Affordable Homes in the Countryside (Rural Exceptions Housing). From the experience of the Council's Housing Strategy team, the Small Growth Villages are (aside from the towns) the most 'desirable' places for Registered Providers to develop affordable housing (rural exceptions schemes) as they provide homes in the more sustainable locations with access to facilities. Consequently, without some form of appropriate wording at criterion 3(f) there is significant concern that, in reality, the remaining criteria would curtail future opportunities for such exception schemes in many of the Small Growth Village locations, not least because of residual hope value.

The Council agrees that Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance removed.

Action: This will result in a proposed main modification to the Plan which will be subject to future public consultation.

Windfall sites that arise during the plan period

The Council agrees that the likely contribution from this source of housing supply from 2029/30 to 2039/40 can increase to 180dpa and remains an acceptably cautious figure.

Action: This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

Housing Provision - Way Forward

The Council agrees to a number of proposed options as set out in paragraph 48, and will review the potential for:

- a) Additional or extended allocations
- b) Increasing the expansion of small growth villages above 6% (to 8%)
- c) Expansion of the list of small growth villages to include those with a single key service and (say) three secondary/desirable services and in line with the further stages of review as set out in the Council's methodology for site selection background paper [C2]
- d) Inclusion of the allocated 45 dwellings at Two Furlong Hill in the adopted Wells-next-the-Sea Neighbourhood Plan in the future supply.

Action: These changes would result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

Employment Land

The Council agrees to the removal of H27/1 Land at Heath Farm, Holt, (site withdrawn by owner) and NW52, Land at Bradfield Road, North Walsham from the Plan.

Action: These will result in proposed Main Modifications to the Plan which will be subject to future public consultation.

Gypsy, traveller and travelling showpeople's accommodation

The Council agrees that an updated Gypsy & Traveller Accommodation Needs Assessment is required.

Action: A revised Gypsy and Traveller Accommodation Need Assessment has already been commissioned and is expected to be available late August / early September. This evidence, and any resulting changes to the Plan, will be made publicly available through further public consultation as part of the action plan detailed below.

Action Plan

The following details the substantive areas where additional work and/or evidence is required in order to address the main soundness issues. These changes will be subject to member endorsement, public consultation to enable feedback, to inform any required future hearing session(s) and the content of further Main Modifications so that the Local Plan addresses the concerns raised.

1. Gypsy, traveller and travelling showpeople's accommodation

A revised Gypsy and Traveller Accommodation Need Assessment has been commissioned based on best practice is expected to be available late August/ early September. Any necessary changes to the Plan that arise from the assessment will be drawn up.

2. The Small Growth Villages Policy

Pending officer review and member endorsement:

- a) Increase the growth allowance to 8%,
- b) Review the policy options and potential to increase the number of SGVs to include those with a single key service and, say 3 secondary/desirable services, taking into account environmental and infrastructure constraints.

3. Local Housing Need & Overall Housing Provision in the Plan

In order to address the minimum 1,000 dwelling shortfall identified, the Council proposes a range of measures that could increase the supply and flexibility of housing delivery across the Plan period by approximately 1,300 -1,500 additional dwellings. This will be achieved by a combination of:

- a. **Additional Sites** - undertaking a high-level review of additional sites considered suitable for development but not previously selected, (approximately 430)
- b. **Extended Sites** - identification of existing proposed allocations with suitable scope to be extended. (approximately 220 dwellings)
- c. **Increased Capacity of Sites** - identification of existing proposed allocations with suitable scope for their dwelling yield to be increased. (approximately 100)
- d. **Small Growth Villages Policy**
 - i. Increasing the overall capacity of Small Growth Villages from 6% to 8%.
 - ii. A review of the potential to expand the number of Small Growth Villages and potential policy options [if endorsed, this approach would result in further additional housing supply over and above the 1,300 dwellings].
- e. **Windfall** - based on a proven historical delivery trend of delivering 295 dwellings per annum as 'windfall', the Council proposes to include in the housing supply from 2029/30 an annual windfall allowance of 180dpa. This will account for an addition 495 dwellings across the plan period.
- f. **Wells-next-the-Sea Neighbourhood Plan** - incorporating the 45 proposed dwellings from the adopted Neighbourhood Plan in the housing supply of the Local Plan.

Timeline

Subject to member endorsement, it is anticipated that this work, including a six-week public consultation period, as set out below, could be achieved within five months meaning that any further hearing session(s) could be held early in the new year.

This would keep the Plan on track to meet anticipated adoption in April 2025, as anticipated in Paragraph 15. An indicative breakdown based on the work detailed above is set out below, where any further work could impact this:

Task		Date Expected
1.	Initial scoping and background work	August 2024
2.	Completion of Background Papers and detailed assessments	September 2024
3.	Member endorsement (Planning Policy & Built Heritage Working Party)	October 2024
4.	Member endorsement (Cabinet)	November 2024
5.	Six-week Public Consultation	Mid November - December 2024 (TBC)
6.	Further Public Hearing(s)	February 2025 (TBC)
7.	Consolidation and finalisation of proposed modifications and supporting documentation and required consultation	TBC
8.	Receipt of Inspector's Report	TBC

We trust that the above provides a pragmatic approach and brings clarity on the Council's intentions. We would be very grateful for your response in due course to clarify if the actions proposed at this time will, in your opinion, address the main soundness issues, subject to the outcomes of further public consultation, future public hearings and the ongoing examination process.

We would be grateful for your clarification on the question raised in relation to Policy SS1 3 (f)

We will of course provide the detailed policy proposals to be contained in the six-week public consultation following member endorsement.

In April the Council submitted draft schedules covering the strategic policies and sites which consolidated the main and additional modifications put forward through the earlier Hearings. Whilst recognising that some of these areas will now need to be informed by further consultation it is understood that the remaining issues can be corrected in due course through modifications to the plan once the specific wording has been agreed. Officers would welcome

timely feedback on these proposed so as to progress the work in a manageable way alongside the actions above.

Yours sincerely

Iain Withington

Acting Planning Policy Manager

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North Norfolk Local Plan Examination

Russell Williams
Assistant Director – Planning
North Norfolk District Council
Holt Road
Cromer
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30 August 2024

Dear Mr Williams

NORTH NORFOLK LOCAL PLAN EXAMINATION

Thank you for your letter dated 16 August 2024 in response to my post hearings letter dated 24 May 2024¹ and for the Council's mostly positive approach to seek to address the main soundness issues raised. I have the following response.

1. The intention to base the plan's examination on the housing monitoring information from April 2023 is in order to provide stability but may need to be reviewed if the timescale for the future steps set out in your letter slips significantly.
2. The receipt of a planning application for Site W07/1 at Wells is noted but this does not change the merits of the allocation set out in my previous letter and in the light of unallocated sites on the southern side of the town with little or no impact on the most sensitive coastal landscape character areas. Given the conclusion of the examination that the allocation be deleted any decision to approve the application should be considered a departure from the emerging local plan in conflict with its evidence base.
3. The plan places significant reliance on housing delivery from an untried and unproven (in this district) small growth villages policy, as opposed to the previous approach of allocating sites in such villages. It follows that the wording of Policy SS1(3) and criterion f must not render the policy ineffective by causing uncertainty and/or acting to deter schemes from coming forward. The matter can be discussed at any further public hearings, but the latest wording you suggest for criterion f seems encouraging of schemes and may therefore be acceptable.
4. I must emphasise that, in addition to publishing an updated Gypsy, Traveller and Travelling Showpeople accommodation needs assessment, the Council should consider what steps need to be taken to address the findings in the plan, including if necessary proposing allocations or amending the criteria in

¹ Not released until 19 July 2024 due to the general election.

Policy HOU5. Any proposed changes to the plan should form part of the forthcoming six-week public consultation.

5. Turning to the Council's proposals to increase the supply and flexibility of housing delivery by approximately 1,300 to 1,500 additional dwellings over the plan period, depending on how it is done this should be a good basis for the examination to proceed. This is without prejudice to the future findings of the examination which will depend on the evidence presented, consultation responses and any further public hearings.
6. However, the Council will know better than anyone the latest position in relation to housing completions, unidentified sites coming forward, nutrient neutrality constraints and the latest progress in relation to large schemes, particularly those at Fakenham and North Walsham. These matters are likely to be raised at any future public hearings and will have a bearing on the number of additional dwellings needed to ensure an adequate housing land supply going forward.
7. The timeline the Council proposes for the various steps to progress the plan are acceptable but should not be allowed to slip significantly. Please keep me advised as to progress. The Council will be aware of the letter from the Minister of State dated 30 July 2024 regarding 'pragmatism' in local plan examinations and the reply from the Chief Executive of the Planning Inspectorate dated 1 August 2024. In this case the plan is capable of being found sound with limited additional work to address soundness issues, but that additional work should be progressed at pace.
8. This letter should be placed on the examination website for information. I will ask the programme officer to inform hearing participants when it is published but I am not inviting or accepting submissions from other parties at this stage.

David Reed

INSPECTOR