



Report to North Norfolk District Council

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an Inspector appointed by the Secretary of State for Housing, Communities and Local Government

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

Report on the Examination of the North Norfolk Local Plan

The Plan was submitted for examination on 11 May 2023

The examination hearings were held between 23-25 January 2024, 13-15 February & 5-7 March 2024 and 8-10 April 2025

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Abbreviations used in this report

dpa	Dwellings per Annum
FC	Further Consultation (in November/December 2024)
HGV	Heavy Goods Vehicles
HIA	Health Impact Assessment
HRA	Habitats Regulation Assessment
MM	Main Modification
NL	National Landscape (Area of Outstanding Natural Beauty)
NNLP or the plan	North Norfolk Local Plan
NPPF	National Planning Policy Framework (2021 version unless otherwise stated)
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SGV	Small Growth Village
UPC	Unattributable Population Change
WLR	Western Link Road
(xx)	Examination Document Numbers

Non-Technical Summary

This report concludes that the North Norfolk Local Plan provides an appropriate basis for the planning of the District provided that a number of main modifications [MMs] are made to it. North Norfolk District Council has specifically requested that I recommend any MMs necessary to enable the Plan to be adopted.

Following two sets of hearings in early 2024 and April 2025, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period from 6 August to 17 September 2025. In some cases I have amended their detailed wording where justified and necessary. I have recommended their inclusion in the Plan after considering the sustainability appraisal and habitats regulations assessment and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Changing the plan period to 2024-2040;
- Amending Policy CC13 to ensure development demonstrates nutrient neutrality in critical river catchments;
- Increasing the housing requirement to be delivered by the plan;
- Allocating further housing sites consistent with the spatial strategy of the plan and amending the policy requirements for allocated sites as necessary;
- Amending the strategy for strategic growth at North Walsham and clarifying the requirements for on and off-site infrastructure;
- Deletion of allocation W07/1 at Wells-next-the-Sea;
- Increasing the number of Small Growth Villages, their potential for growth and clarifying the criteria for considering schemes;
- Amending Policy HOU2 to clarify the mix of homes required on housing sites;
- Updating Policy HOU5 for Gypsy, Traveller and Travelling Showpeople's Accommodation to reflect the latest evidence;
- Updating the housing supply figures and housing trajectory to reflect the evidence;
- Deletion of employment allocations H27/1 at Holt and NW52 at North Walsham;
- Updating the overall employment land provision in the plan;
- Identifying the strategic policies of the plan;
- Other modifications to the policies of the plan to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains my assessment of the North Norfolk Local Plan (hereafter the NNLP or the plan) in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the plan's preparation has complied with the duty to co-operate. It then considers whether the plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework (NPPF) in paragraph 35 makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The plan was submitted for examination on 11 May 2023 when the July 2021 version of the NPPF was extant. In December 2024 the latest revision of the NPPF was published. Under paragraph 234(b) it includes a transitional arrangement which means that, for the purpose of examining this local plan, the policies in the July 2021 NPPF remain applicable. Therefore, unless otherwise stated, any references to the NPPF in this report relate to the July 2021 version. However, paragraph 236 of the December 2024 NPPF also applies, and in the circumstances the local planning authority will be expected to begin work on a new local plan under the revised plan-making system as soon as the relevant provisions are brought into force.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The NNLP as submitted in May 2023 is the basis for my examination. It is the document that was published for consultation in January 2022 with the subtitle 'Proposed Submission Version: Publication Stage: Regulation 19' (Document A1).
4. Following the first set of hearings in early 2024 two fundamental issues were identified in respect of the soundness of the plan. As explained under Issues 2 and 6, these were a shortfall in housing provision to meet the needs of the area and the policy for gypsy, traveller and travelling showpeople's accommodation being based on out-of-date evidence. To address these issues, the Council put forward revised proposals in a 'Further Consultation' (FC, Document FC001) between 7 November and 19 December 2024. These further proposals are in effect amendments to the submitted plan and were considered during the second set of hearings in April 2025.

Main Modifications

5. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.

6. Following the two sets of examination hearings, the Council prepared a schedule of proposed MMs (MMC01) and carried out sustainability appraisal (SA) and habitats regulations assessment (HRA) of them. The MM schedule was subject to public consultation for six weeks from 6 August to 17 September 2025. I have taken account of the consultation responses in coming to my conclusions in this report and in their light I have made some amendments to the detailed wording of the main modifications where justified, for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

7. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map was submitted as a web-based link (A2).
8. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are justified and effective.
9. These further changes to the policies map were published for consultation alongside the MMs in the Schedule of Policies Map Changes: Public Consultation Version dated August 2025 (MMC02). No significant comments were received.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the submission policies map and the further changes published alongside the MMs.

Context of the Plan

11. The NNLP once adopted will replace both the North Norfolk Core Strategy incorporating Development Control Policies adopted in September 2008 and the North Norfolk Site Allocations Development Plan Document adopted in February 2011. The development plan will then comprise the NNLP, the Norfolk

Minerals and Waste Plan adopted in May 2025 and any Neighbourhood Plans that have been made (finalised). The NNLP does not cover that part of the district within the Broads Authority area which has its own local plan.

12. North Norfolk District comprises a large rural area of about 336 square miles (excluding the Broads Authority area) with 43 miles of North Sea coastline. The population is currently about 103,000 who live in three main towns, Cromer, North Walsham and Fakenham, a range of smaller towns, villages, hamlets and scattered dwellings throughout the district. The area is primarily agricultural in nature with tourism important along the coast, much of which is designated as a National Landscape (NL) recognising its outstanding natural beauty.

Public Sector Equality Duty

13. I have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included my consideration of several matters during the examination including the provision of accommodation for gypsies, travellers and travelling showpeople, and policies relating to accessible and adaptable housing. I have taken account of the Council's Equality Impact Assessment of the plan (A7).

Assessment of Duty to Co-operate

14. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with the duty imposed on it by section 33A in respect of the plan's preparation. The Council is obliged to co-operate with relevant local authorities and other prescribed bodies in relation to cross boundary strategic matters in order to maximise the effectiveness of the NNLP. I have taken account of the Council's Statement of Compliance with the duty (A8).
15. Prior to plan submission the Council co-operated over an extended period with neighbouring district authorities and Norfolk County Council as Lead Flood Risk Authority and provider of key services such as highways and education, also with critical agencies including Natural England, the Environment Agency and local health bodies. Under the auspices of the wide-ranging Norfolk Strategic Planning Framework, overseen by a member steering group, joint work has been commissioned and co-operation ensured on a range of strategic cross boundary issues including recreational disturbance, nutrient neutrality, housing needs, gypsy and traveller accommodation, infrastructure and health services.
16. Outcomes from this co-operation which have maximised the effectiveness of the NNLP have included the Norfolk-wide recreation mitigation strategy, the Norfolk Environmental Credit Scheme to address nutrient neutrality, the Planning in Health Protocol and common policies to tackle climate change.

17. One specific local issue, the implications of traffic generation from major growth at North Walsham on the B1150 through Coltishall, required co-operation with neighbouring Broadland District Council to commission relevant traffic studies, assess the implications of increased traffic flows, draw up mitigation measures for the village and to agree a suitable policy response for inclusion in the plan.
18. I am therefore satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has been met.

Assessment of Other Aspects of Legal Compliance

19. As required by Section 245 of the Levelling-up and Regeneration Act 2023 in examining the plan I have sought to further the purposes of conserving and enhancing the natural beauty of the Norfolk Coast NL. In so doing I have taken account of the Norfolk Coast Area of Outstanding Natural Beauty Management Plan (G14) and other relevant evidence.
20. The Plan has been prepared in accordance with the Council's Local Development Scheme (A10).
21. Consultation on the Plan, FC and the MMs was carried out in compliance with the Council's Statement of Community Involvement (A9).
22. SA has been carried out throughout each stage of the preparation of the plan as an iterative process. A comprehensive SA was published alongside the plan and other submission documents under Regulation 19 (A3) and an addendum report prepared to assess the MMs (MMC04). The SA process has adequately assessed the NNLP to establish, when judged against reasonable alternatives, that the plan will help to achieve relevant environmental, economic and social objectives.
23. The HRA of the plan published alongside the submission version in January 2022 (A4) identified likely significant effects on European sites from urban effects, recreational pressure and hydrological impacts. However, the subsequent Appropriate Assessment concluded that the first issue would be localised and could be addressed by site design; the second more widespread concern could be mitigated primarily by the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS); and the third by limitations on growth or the expansion of sewage treatment capacity to avoid the discharge of nutrients to rivers. These protections and mitigation measures would be secured by suitable policies in the plan enabling the overall conclusion to be reached that the plan would not cause adverse effects, either alone or in combination, on European sites.

24. The HRA process was repeated at MM stage (MMC03) to consider the potential effects arising from the additional housing growth proposed and took account of Natural England's advice in March 2022 that nutrient pollution resulting from new overnight accommodation could affect the integrity of European sites in the Broads and River Wensum catchments. The updated HRA reaches the same conclusion of no adverse effects having regard to **MM9** which modifies Policy CC13 to require nutrient neutrality to be demonstrated by relevant schemes in these two catchments.
25. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
26. The Development Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. In particular, Chapter 3 of the NNLP seeks to deliver climate resilient sustainable growth with a suite of policies including support for renewable and low carbon energy, energy/water efficiency and coastal change management/adaptation given the eroding coast east of Cromer.
27. The Plan complies with all other relevant legal requirements, including the 2004 Act and the Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Assessment of Soundness

Main Issues

28. Taking account of all the representations received, the written evidence submitted and the discussions that took place at the examination hearings, I have identified 8 main issues upon which the soundness of this plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Whether the strategic policies in the plan look sufficiently far ahead and are clearly distinguished from the non-strategic policies

Plan Period

29. When submitted in May 2023 the plan was intended to cover the twenty-year period from 2016 to 2036, with 13 years of the plan period then remaining. By the time of the first set of hearings, just 12 years remained. NPPF paragraph 22 states that the strategic policies in a local plan should look ahead a minimum 15

years from adoption, and to be consistent with this it was determined during 2024 that the plan period should be extended to 2040 on the basis that the plan would be adopted during 2025. The base date of the plan should correspond to the date from which the housing needs of the district have been quantified, and as explained below, this exercise was undertaken using up to date statistics as at April 2024. In order to be consistent with national policy the plan period should therefore be amended to 2024-40. **MM1** makes this change.

Strategic Policies

30. NPPF paragraph 21 states that plans should make explicit which policies are strategic policies and which are non-strategic, but the NNLP as submitted fails to make this clear. To ensure the NNLP is consistent with national policy **MM68** incorporates a new Appendix into the plan to identify the connections between the plan's policies and its strategic aims, thus providing a comprehensive table of strategic, hybrid and non-strategic policies.

Conclusion

31. Subject to **MM1** and **MM68**, the strategic policies in the plan look sufficiently far ahead and are clearly distinguished from the non-strategic policies.

Issue 2 – Whether the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing

Determining local housing needs

32. Paragraph 61 of the July 2021 NPPF states that the minimum number of homes needed in the district should be determined by using the standard method set out in the Planning Practice Guidance (PPG) at that time unless exceptional circumstances justified an alternative approach. The standard method at the time took the 2014 based household projections as the demographic starting point to which an affordability uplift was applied and the figure potentially capped to limit any increase. However, the submitted plan uses 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 2016-2036 plan period of the submitted plan, a total of 9,600 dwellings. It is argued that there are 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.
33. However, using the 2016 or more up to date 2018 based projection would be in direct conflict with national policy. The then PPG stated that the 2014 based projections should be used to provide stability, to ensure historic under-delivery and declining affordability were 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 then PPG was also clear that whilst any alternative approach should be based on realistic assumptions, more recent household projections were not appropriate for use in what would otherwise be the standard method.

34. The 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.
35. 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 relevant 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 the then PPG specifically precluded 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 need. Despite concerns about their accuracy, however valid, to be consistent with national policy the 2014 based projections should be used to support the objective of boosting housing supply.
36. For these reasons 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.
37. Having concluded that the standard method should be followed instead of the Council's bespoke method, it was determined during 2024 that the then latest available information should be used to derive the most up to date housing need figure for the district. Using the affordability ratio published in March 2024 the local housing need figure for North Norfolk is derived as follows:

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

38. 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

39. 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.
40. To be positively prepared the plan therefore needs to provide for a minimum of 8,900 additional dwellings over the 2024-40 plan period.

Increasing the Housing Provision in the Plan

41. Policy HOU1 as submitted provides for an additional 12,096 homes in the district after the April 2016 base date of the plan, although an estimated 1,497 of these would be delivered after the end of the plan period in 2036. This would have been sufficient to meet the earlier assessed housing need of 480 dpa over the 2016-36 plan period with a reasonable surplus to allow for contingencies. However, reassessing the district's local housing need as 557 dpa and revising the plan period to 2024-40 to be consistent with national policy means the housing provision in the submitted plan is insufficient. Without further provision the plan would not meet the area's objectively assessed needs in conflict with the requirement in NPPF paragraph 35 for it to be positively prepared. In these circumstances the plan would fail a key test of soundness.
42. In the event, advised of this by my letter dated 24 May 2024 (EH006(f)), the Council responded by putting forward a series of proposals to address the shortfall in the FC in Autumn 2024 and subsequently proposed their inclusion in the plan. These proposals are discussed below and account for many of the MMs that are necessary to enable the plan to be adopted.
43. As a result of the FC proposals and various other adjustments Policy HOU1 as revised provides for an additional 9,880 homes in the district over the amended plan period 2024-40, a surplus of 980 dwellings over the housing requirement of 8,900 homes. This surplus allows a modest contingency for the slippage or the non-implementation of schemes, although it is assumed two large allocations at North Walsham and Fakenham would deliver 1,030 dwellings after 2040 which could potentially be brought forward. To ensure the plan is positively prepared, **MM22** amends the housing provision in Policy HOU1 by settlement and the

overall district figure, **MM36** sets out the revised list of housing allocations in Policy DS1 and **MM66** amends the housing trajectory in Chapter 23 of the plan to show the latest projection of annual completions for each allocation and for other sources of supply.

Five Year Housing Land Supply

44. Paragraph 68 of the NPPF states the plan should identify a supply of specific, deliverable sites for the first five years of the plan period and paragraph 74 requires local planning authorities to identify and update annually a minimum five years' supply against the housing requirement in the plan. Using the latest (April 2023) housing monitoring information used for the examination, the five-year requirement as at April 2025, including a 5% buffer, is 3,144 dwellings¹. The latest housing trajectory projection is that 3,712 house completions will be delivered during the 2025-30 period, a satisfactory 5.9 years' supply. On this basis there will be a satisfactory five-year supply on adoption of the plan.
45. To be consistent with national policy, **MM22** includes the requirement to publish a housing land supply statement each year and, if housing land supply falls below 5 years, to apply the presumption in favour of sustainable development.

Conclusion

46. Subject to **MM22**, **MM36** and **MM66**, the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing.

Issue 3 – Whether the spatial strategy of the plan is justified, positively prepared, consistent with national policy and would be effective

Spatial Strategy

47. The spatial strategy of the plan as submitted (Policy SS1) is based on a traditional settlement hierarchy with five tiers – Large Growth Towns (Cromer, North Walsham and Fakenham), five Small Growth Towns (Holt, Hoveton, Sheringham, Stalham and Wells-next-the-Sea), four Large Growth Villages (Blakeney, Briston, Ludham and Mundesley), 23 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. Neither the methodology for arriving at the hierarchy nor the site selection methodology were seriously disputed during the examination. The apportionment of growth to the towns and large growth villages is not however prescriptive and individual site allocations are made on a detailed assessment

¹ Shortfall in 2024/25 from trajectory 557-348=209. 5 years (2025-30) x 557 = 2,785. Total 2,994 plus 5% buffer = 3,144 dwellings.

of promoted sites for their availability and suitability. The merits of Individual allocations were the subject of many representations and much discussion at the hearings and my conclusions on these are set out under Matter 4 below.

Small Growth Villages

48. In addition to allocating housing sites at the larger settlements, the plan also includes a policy allowing housing growth in the next tier of the settlement hierarchy, the 23 'Small Growth Villages' (SGVs) listed in Policy SS1. These were selected as settlements identified by an audit as having at least one 'key' service and 4 'desirable' services. These villages have settlement boundaries defined on the Policies Map but instead of allocations the policy specifies an acceptable percentage growth and a series of criteria which will be used when assessing individual planning applications. The approach is inherently uncertain with that disadvantage both for the communities concerned and for other interested parties. However, it may be more flexible to effectively deliver housing and there are precedents (eg Breckland Local Plan Policy HOU04). Subject to some modifications, addressed below, the policy can be judged sound.
49. In order to boost housing supply, additional SGVs were put forward in the FC by including villages with at least one 'key' service and 3 'desirable' services, thus widening the scope of the policy. These are Beeston Regis, Erpingham, Felmingham, Great Ryburgh, Itteringham, Langham, Neatishead, Northrepps, Stibbard, Tunstead and Worstead, with settlement boundaries defined for each. Secondly, the FC proposed an increase in the growth of small growth villages from 6% to 9%. The villages have considerable scope for development which would support local services and growth of 9% would still maintain the overall strategy of accommodating most development in the higher order settlements. With these two changes the policy continues to promote growth in the most sustainable villages and, given criteria which would ensure individual proposals are acceptable in relation to the village concerned, particularly criterion 3c, the increase in potential growth enables the plan to be positively prepared.
50. The veracity of the settlement audit, and thus inclusion in the SGVs list, was disputed in some instances, for example the limited opening hours of some public houses, quality of village halls, capacity of village schools and frequency of church services were not taken into account. However, village facilities will inevitably change over time and their quality is subjective. Given the criteria based, discretionary nature of the policy, exclusion of any village from the list would not be justified. Whilst other criteria for the selection of SGVs could have been used, the approach taken is based on the evidence and inevitably involves a degree of planning judgement. The inclusion of further land within the settlement boundaries was also suggested to facilitate development, but the boundaries are tightly drawn as the function of the policy is to enable the relative merits of sites on the edge of the villages to be assessed at planning

application stage, not to prejudge these through more widely drawn boundaries being included at local plan stage.

51. In relation to individual villages, the submitted plan recognises that Potter Heigham, Sea Palling and Walcott, whilst having the facilities to be considered small growth villages, are environmentally constrained and no growth should be relied upon by the plan. Similarly, no growth should be assumed at Horning as there is no realistic prospect of the discharge from the local water recycling centre meeting the required standards. Catfield is seriously constrained but some limited development may be possible if technical drainage solutions can be found so should remain on the list. There is no reason why the potential growth figure for Badgersfield (Scottow) should be arbitrarily reduced as (like all villages) criterion 3c of the policy would protect the village from schemes of excessive scale that would adversely affect its character. The figures are thus not a requirement that has to be met but indicative of the potential.
52. Taking the SGVs in the plan as submitted with these additional villages and applying the 9% growth guidance gives a total potential growth of 929 additional dwellings over the plan period. However, given the constraints that apply in some villages and the unproven nature of the policy only 80% of this figure, some 743 dwellings, are taken into account for housing land supply purposes. The effectiveness of the policy should be kept under review.
53. In relation to the detailed criteria in Policy SS1(3), several changes are required to ensure the policy is justified and effective. The requirement in criterion (a) for proposals to 'abut' the defined settlement boundary should be replaced by 'adjacent' to increase flexibility and in (b) the stipulation that no further permissions will be granted after the village 'allowance' is reached is arbitrary and unjustified. The 9% calculations should be 'indicative growth figures' with the policy reworded to say that permissions will not be granted that significantly exceed these numbers. A new criterion is needed to clarify that new dwellings within the settlement boundary or granted under exceptional policies will not count towards the total. Criterion (e) should be deleted as community benefits are covered by Policy HC4. Criterion (f) as submitted would render the policy ineffective by causing uncertainty and acting to deter schemes coming forward; it is however justified to encourage schemes that include a greater proportion of affordable housing than generally required by Policy HOU2. Policy HOU3 will still support conventional rural exception housing schemes.
54. To ensure the plan is positively prepared and the SGVs policy is justified and effective, **MM10** amends the criteria and adds the additional SGVs into Policy SS1 and updates the supporting text. The settlement boundaries for the extra villages published in the FC need to be added to the Policies Map. In addition, it is necessary to delete Appendix 4 from the submitted plan which described the old approach in more detail. This is done by **MM67**.

Conclusion

55. Subject to **MM10** and **MM67**, the spatial strategy of the plan is justified, positively prepared, consistent with national policy and would be effective.

Issue 4 – Whether the housing allocations and settlement boundaries in the plan are justified and consistent with national policy and whether the site-specific policies for the allocations are justified and would be effective

56. The settlement pattern in North Norfolk is such that, of the settlements classified as Large Growth Towns, Small Growth Towns or Large Growth Villages, four lie within or are closely bounded by the Norfolk Coast NL. These are Cromer, Sheringham, Wells-next-the-Sea and Blakeney. The others can grow without encroaching into the NL. NPPF paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in the NL and the scale and extent of development within them should be limited. However, in order for the plan to meet the economic and social needs of these four settlements and to be positively prepared overall, certain allocations are proposed in the NL in the submitted plan and FC. These are Sites C22/4 and C16 in Cromer, SH04 and SH18/1B in Sheringham, W01/1 and W07/1 in Wells and BLA04/A and BLA01/B in Blakeney.
57. With the exception of Site W07/1 (see below), these allocations have limited landscape impact that can be acceptably mitigated and form part of a justified and sustainable strategy. An alternative strategy, allocating additional land in settlements outside the NL such as Fakenham and North Walsham, would not meet the needs of the four settlements given their distance away and would not deliver the housing requirement as there is little scope for further completions on allocated sites in those towns during the plan period (some completions are already expected to be beyond 2040). The five allocations in the NL are thus justified by exceptional circumstances, in the public interest and consistent with the duty to further the purposes of the NL.

NORTH WALSHAM

Land West of North Walsham

58. North Walsham is a Large Growth Town without significant environmental or landscape constraints and has been appropriately 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.

59. 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 dwellings. However, the transport assessment of December 2023 by AECOM (EH011(e)(ii)) concludes that the northern section 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 to Norwich through the villages of Coltishall and Horstead.
60. As such this section of the WLR is not justified and a modification to the plan is required to reduce the WLR to a link between Norwich Road and Cromer Road, with any northern section 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.
61. 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 will not significantly affect the approximate 2,000 dwelling capacity of the allocation.
62. 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 as explained in paragraphs 129-130 below and would encroach into the countryside to the north-west of the town. The site is thus not justified and should be deleted from the plan pending consideration of any northern extension of the WLR in the future. **MM49** does this.
63. In relation to traffic along the B1150 through Coltishall/Horstead, a preliminary assessment indicates a material increase in flows which require improvement and mitigation measures to be put in place. Several have been identified so far, including traffic and speed management measures, pedestrian safety and capacity measures. For effectiveness the policy should be amended to require a transport assessment to finalise these measures together with necessary measures within the town including improvements to the junction at Norwich Road, protection for Aylsham Road/Skeyton Road and improved pedestrian/cycling routes to key destinations.
64. 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 is required. In the submitted plan the start of completions was envisaged in 2026/27 but this has been overtaken by events and the revised housing trajectory suggests this in 2028/29 with some 730 dwelling completions after the end of the plan period in 2040.

65. The addition of a further allocation in North Walsham at the end of Mundesley Road (Site NW16) has implications for the funding of the off-site infrastructure improvements that will be required, particularly highways and education. To be justified and effective the policy should state these are to be proportionately funded in relation to their relative impacts as both will form part of the planned growth of the town as a result of this plan.
66. To be justified and effective **MM50** is thus necessary to delete the WLR north of Cromer Road, delete the associated housing allocation north of the railway line, require a transport assessment to identify necessary off-site measures including traffic calming/safety improvements at Coltishall/Horstead, and to secure proportionate funding with Site NW16 for off-site infrastructure needs including highways and education. It also clarifies the capacity of the site, the primary school requirement and other detailed matters.

Land at End of Mundesley Road

67. The housing allocation at the end of Mundesley Road (NW16) was put forward at FC stage. It comprises a large agricultural field adjacent to the northern edge of the town and is well contained by the tree lined ex-railway cutting forming the Paston Way, Little London Road and mature trees along the eastern boundary which could be strengthened with further landscaping. Whilst some distance from the town centre, inevitable for any new allocation on the periphery of the town, the site is still accessible to a wide range of services and facilities within a radius of about 1.5 km. The allocation is therefore justified in principle. In addition to an assessment of traffic flows and identification of any necessary off-site highway mitigation measures, a detailed assessment of walking and cycling routes into and around the town from the site will be required to identify and remedy any gaps in provision.
68. To protect local roads as far as possible from the impact of additional traffic the site requirements set out in the local plan also need to include primary access to the site from the B1145 via a roundabout, an internal layout which minimises traffic using Mundesley Road/Lyngate Road, and a requirement for fair and equitable contributions towards improved education provision in the town and traffic/pedestrian measures on the B1150 through Coltishall/Horstead taking account of the other planned development in the town (particularly Site NW62/A West of North Walsham). For effectiveness the part of the site to the west of the Paston Way, reserved for access and landscaping only, should be shown green for open space on the policies map.
69. The allocation is justified to help deliver the housing requirement. **MM51** incorporates the site into the plan with site specific requirements including those

above that are justified and would be effective. Following consultation on the MMs to ensure effectiveness the site requirements are strengthened to require the link to the B1145 as part of the first phase of the development to relieve traffic flows on Mundesley Road/Lyngate Road as soon as possible, to provide a landscaped buffer on the southern boundary adjacent to existing housing and the preparation of an ecological appraisal and mitigation/enhancement plan to be implemented as part of the development.

Land at Norwich Road & Nursery Drive

70. Land at Norwich Road & Nursery Drive (NW01/B) was initially allocated in 2011 and has been part built out. The NNLP continues to allocate the remainder of the site with an extension into the field alongside the railway which would have minimal impact. For effectiveness **MM48** is required to strengthen the boundary landscaping, require a transport assessment to identify any off-site impacts in the light of the other planned growth in the town, to clarify the capacity of the site and to raise the implications of the mineral safeguarding area.

CROMER

71. Cromer is tightly enclosed by the Norfolk Coast NL, but as one of just three large growth towns there are exceptional circumstances that justify further housing development in the public interest where suitable sites are available. Two such sites have been identified for allocation in the NL, Land West of Pine Tree Farm and the Former Golf Practice Ground, Overstrand Road, and one site outside the NL, Land at Runton Road/Clifton Park.

Land West of Pine Tree Farm

72. The submitted plan allocates Land West of Pine Tree Farm, Norwich Road (Site C22/2), some 26 hectares of open farmland between Roughton Road and Norwich Road, south of the town and severed from it by the railway line, for some 400 dwellings plus elderly accommodation. The FC proposes to extend this area further to the south (Site C22/4) with additional farmland to cover about 44 hectares in all, capable of accommodating about 100 dwellings more. The extended site surrounds Beckett's Plantation, an area of woodland and important landscape feature, providing scope for an improved, lower density layout with landscaping along the southern side to form a long-term boundary for the town. In addition to housing, the site is intended to include improved sport and recreational facilities for the town.
73. The additional land is necessary to help deliver the housing requirement and despite its location in the NL is justified given the dearth of alternatives outside the NL to allow the town to expand.
74. **MM39** replaces the existing policy to incorporate the additional land, clarify the site capacity and set the site-specific requirements that are justified and would be effective, including site access arrangements, landscaping, layout, design

and infrastructure requirements. Following consultation on the MMs and the comments of the local highway authority Criterion 1 has been amended for clarity to require both a segregated cycle/pedestrian route along Norwich Road into the town and a cycle/pedestrian link to Roughton Road unless otherwise agreed by the local highway authority. A link to Roughton Road is necessary for connectivity but the A149 is a strong, if not the strongest, pedestrian and cycling desire line from the site to local schools, healthcare and town centre facilities. The site is proposed to include community sports facilities so attractive active travel routes to and from the town are important to minimise reliance on the private car and promote active travel. The amended wording further ensures that Policy C22/4 would be justified and effective in promoting sustainable transport options at this edge of town location.

Land at Runton Road/Clifton Park

75. The housing allocation at Runton Road/Clifton Park (C10/1) was put forward at FC stage. It was included in the Regulation 18 Draft Local Plan in 2019 but was not subsequently included in the submitted plan. The site is assessed positively in the site assessments for Cromer (D1). The local prominence of the site along Runton Road and its role in maintaining openness between the town and East Runton given the extensive caravan sites in the area are significant concerns but development provides the opportunity for a well-designed scheme that mitigates the current harsh edge of the Clifton Park estate and provides a long-term visual gateway to the town. To retain some sense of openness there is a need to provide a deep landscaped frontage along the stretch of Runton Road concerned with no development proud of No 19 Clifton Park and access provided via Clifton Park rather than Runton Road. In addition to this requirement in policy, the landscaped strip should be shown green for open space on the policies map.
76. The western edge of the housing area should also be set back into the site to allow strategic landscaping along that boundary and a requirement for a landscaped buffer between the housing and the public footpaths/bridleway running through the site to maintain attractive recreational routes. There is no dispute that the southern section of the site alongside the railway should remain undeveloped to mitigate the visual and acoustic presence of the railway line, to provide separation from the rising ground to the south which is designated as part of the NL and to provide an extensive area of long term managed open space for recreation and biodiversity.
77. Whilst there is biodiversity value in parts of the site which has developed since the cessation of agricultural use in the late 1980s there are also areas of scrubland and less important habitats. With extensive scope for landscape enhancements, sustainable drainage, new shrub and tree planting a biodiversity net gain of at least 10% could be delivered on the site.
78. The site is sensitive but lies outside the NL and its allocation is justified to help deliver the housing requirement. **MM40** incorporates the site into the plan with site specific requirements that are justified and would be effective. This is further ensured following consultation on the proposed MMs by allocating the

site for *up to* 70 dwellings to recognise the constraints affecting development and a further requirement to protect existing hedgerows and trees.

Other Allocations

79. Site C16 (Former Golf Practice Ground, Overstrand Road), now a cleared site, lies between Overstrand Road and Northrepps Road. The site lies within the NL but the allocation is justified given the dearth of alternatives to allow some expansion of the town. For effectiveness the policy requires amendment to clarify the specialist elderly requirement and to raise the implications of the mineral safeguarding area. **MM38** makes these changes.
80. Site C07/2 (Land at Cromer High Station) has been allocated since 2011 without any progress as to development coming forward. In the absence of any evidence that the site is deliverable it is not justified and should be removed, although it remains within the settlement boundary. **MM37** deletes the site.

FAKENHAM

Land North of Rudham Stile Lane, West of Water Moor Lane

81. 85 ha of primarily agricultural land north of Rudham Stile Lane was allocated in 2011 but progress in delivering the site 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 granted in 2021. The site to the west (F01/B) has no planning permission and is reallocated in the NNLP for about 627 dwellings. The site is in effect a continuation of that to the east and for the most part is controlled by the same landowner. The strategy for development of the allocation forms part of that drawn up for the wider site but the delays so far will have a knock-on effect on the timing of completions.
82. In the submitted plan the start of completions west of Water Moor Lane was envisaged in 2024/25 as completions on the site to the east wound down. As the latter has been delayed the revised housing trajectory suggests completions will now start in 2035/36 with some 300 dwelling completions beyond the end of the plan period in 2040.
83. For effectiveness **MM41** clarifies the capacity of the site, the requirement for replacement sporting facilities and other detailed matters.

Other Allocations

84. Sites F02 (Land Adjacent to Petrol Filling Station, Wells Road) and F03 (Land at Junction of A148 and B1146) are relatively small areas of grassland between the built-up area and the by-pass which would amount to a logical rounding off of the town. Site F10 (Land South of Barons Close) is an area of grassland

south of the built-up area sloping down towards the River Wensum. For effectiveness **MM42** and **MM43** are necessary to raise the implications of the minerals safeguarding area for the development of Sites F03 and F10 and in the latter case the requirement for a site-specific flood risk assessment. No modifications are necessary for Site F02.

Settlement Boundary

85. As submitted the settlement boundary of Fakenham includes the industrial area off Hempton Road south of the River Wensum bridge. Notwithstanding the intervening parish boundary, there is no justification for the exclusion of the adjacent built-up area in the Dereham Road/Pond Road area of Hempton parish. This change to the policies map was published alongside the MMs.

HOLT

86. Land at Heath Farm between the A148 and Hempstead Road was allocated for housing development in 2011 and Site H20 (Land at Heath Farm) forms an extension of this on adjacent farmland to the east. The eastern boundary to the extended site is well defined on the ground and access would be from the existing roundabout on the A148. For effectiveness **MM44** is necessary to clarify the capacity of the site, ensure a landscaped buffer is provided on the eastern and southeastern boundary and to raise the implications of the minerals safeguarding area. **MM45** deletes the employment allocation at Heath Farm (Site H27/1) as explained in paragraph 130.
87. Site H17 (Land North of Valley Lane) comprises a single field on the edge of the built-up area visually enclosed by trees on the other boundaries with access off the A148 Norwich Road. No modifications are necessary.

HOVETON

88. The submitted plan allocates Land East of Tunstead Road (HV01/B), part of a field which the FC proposes to extend to the whole field (HV01/C). In addition, the FC proposed a second allocation for Land at Stalham Road (HV06/A), part of the adjacent arable field to the north-east and contiguous with the first site. These relatively featureless fields lie adjacent to the north of the existing built-up area and, even together, would not encroach significantly towards St Peters Lane and would allow for a lower density scheme, improved landscaping and open space, off-site highway improvements and drainage infrastructure.
89. The extension of Site HV01/B and addition of Site HV06/A are justified to help deliver the housing requirement. **MM46** amends and updates Policy HV01/B to incorporate the additional land and **MM47** incorporates Site HV06/A into the plan. For effectiveness these policies clarify the site capacities and specify the

site requirements including a through route from Tunstead Road to Salhouse Road, linking to the new roundabout on Stalham Road, on-site open space, a landscaping buffer on the northern boundary and infrastructure requirements notably off-site highway improvements and a foul water drainage connection to the Belaugh treatment works.

SHERINGHAM

90. Sheringham is tightly enclosed by the Norfolk Coast NL, indeed the Woodland Rise area lies within the NL, but as a small growth town there are exceptional circumstances that justify further housing development in the public interest where suitable sites are available. Two such suitable sites have been identified in the NL.
91. Site SH04 (Land adjoining Seaview Crescent) lies within the designated NL but being north of Woodland Rise is effectively within the built-up area of the town and its development would have little impact on the wider landscape of the NL. The site was first allocated in 2011 and has been brought forward into the plan as there is still developer interest. No modifications are required.
92. Site SH18/1B (Land South of Butts Lane) is a relatively discreet, enclosed area of agricultural land on the southern periphery of the town that would form an extension of the recent development at Repton Way. The site lies within the NL but the allocation is justified given the dearth of alternatives to allow expansion of the town. For effectiveness **MM53** is necessary to strengthen the requirement for a foul drainage strategy.
93. Development of Site SH07 (Former allotments, Weybourne Road, adjacent to The Reef) is now well underway so the allocation is not now justified and should be deleted from the plan. **MM52** does this.

STALHAM

94. The submitted plan allocates Land North of Yarmouth Road and East of Broadbeach Gardens (ST23/2), the western section of which was originally allocated in 2011, for a combined extra care and residential scheme. The site wraps around the rear of two detached houses with large rear gardens and a change to the policies map published alongside the MMs incorporates this into the allocation. For effectiveness **MM54** is necessary to amend the site area, clarify the development requirements and to raise the implications of the minerals safeguarding area.
95. The submitted plan also allocates Land adjacent to Ingham Road (ST19/A), part of an arable field, which the FC proposed to extend to the whole field (ST19/B). In addition, the FC proposed a further allocation Land at Brumstead Road (ST04/A), part of another arable field. These relatively featureless fields lie adjacent to the existing built-up area and subject to access, design, landscaping and infrastructure considerations are suitable for development.

96. The extension of Site ST19/A and addition of Site ST04/A are justified to help deliver the housing requirement. **MM55** amends and updates Policy ST19/A to incorporate the additional land and **MM56** incorporates Site ST04/A into the plan. For effectiveness these policies clarify the site capacities and specify the site requirements including access, open space, design, layout, landscaping and infrastructure.

WELLS-NEXT-THE-SEA

97. Wells-next-the-Sea lies within the Norfolk Coast NL, 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 on its southern side.
98. 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 Meads 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.
99. 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.
100. The site itself lies just within the Rolling Open Farmland landscape character type (LCT) 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.

101. 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.
102. The evidence base supporting the allocation is thus not justified. 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 correctly been assessed as unsuitable for development. The allocation of Site W07/1 is thus not justified and would be inconsistent with national policy to protect and enhance valued landscapes. The allocation should therefore be deleted and **MM57** does this.
103. It is appreciated that the site has been granted planning permission despite notification after the first set of hearings (EH006(f)) that the allocation was unsound for landscape reasons. However, this does not change its merits and there are alternative sites on the southern side of the town which would have significantly less landscape impact on the most sensitive LCTs in this part of the Norfolk Coast NL and would not overlook the Heritage Coast designation protected by Policy ENV3. The FC provided the opportunity for a more suitable site or sites to be brought forward to address the housing needs of the town but in the event sufficient sites were put forward elsewhere to meet the district's housing requirement.

BLAKENEY

104. Blakeney lies within the Norfolk Coast NL, but as a large growth village 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 Land East of Langham Road (BLA04/A), part of an agricultural field on rising ground inland from the village. The policy emphasises the need for a high-quality development with boundary landscaping. For effectiveness **MM59** is necessary to strengthen the protection of the amenities of occupiers of the housing to the north of the site.
105. A further allocation, Land West of Langham Road (BLA01/B), was put forward at FC stage. This comprises the lower part of a field to the west of Oddfellows Road and Hettie Close, two recent developments on the southwestern side of the village, but would involve vehicular access from Langham Road and a pedestrian/cycle link to Morston Road. Whilst a sensitive site in landscape terms, development would be visually well contained by the topography and is justified to help deliver the housing requirement. **MM58** incorporates the site into the plan with site specific requirements that are justified and would be effective, including the access requirements, high-quality design, on site open

space, buffer landscaping and an impact assessment to mitigate recreational pressure on the nearby Wiveton Downs SSSI.

106. Blakeney lies wholly within the NL but the allocation of both sites is justified to allow some expansion of the village. The development of both sites will be subject to Policy 2 of the recently made Blakeney Neighbourhood Plan restricting occupancy to 'principle residences' and to its other policies.

BRISTON

107. The submitted plan includes two housing allocations, Site BRI01 (Land East of Astley Primary School) and Site BRI02 (Land West of Astley Primary School) with the FC proposing an extension of the latter on more of the field concerned to wrap around the primary school to the west and south. Both are well related to the village and provide an opportunity to provide a car parking/drop off area for the school.
108. The extension of Site BRI02 (now BRI02/C) is justified to help deliver the housing requirement. **MM61** amends and updates Policy BRI02 to incorporate the additional land. For effectiveness this clarifies the capacity of the site and specifies a series of requirements for site development including provision of the car parking/drop off area, access, open space and ensuring any long-term expansion of the school is not prejudiced. Following consultation on the proposed MMs these have been strengthened in respect of hedgerows within the site and ecological enhancement measures.
109. In respect of Site BRI01 to ensure effectiveness **MM60** is necessary to clarify hedge removal is acceptable for the access and to delete the requirement for the car parking/drop off area.

LUDHAM

110. Land South of School Road (LUD01/A), part of a field next to the village, was first allocated for housing in 2011 and as an undeveloped site was brought forward into the submitted plan. The FC proposed allocating a further part of the field immediately behind existing housing on Norwich Road. This would be well screened from most public views and protects the view of the church from the northwest. Notwithstanding local misgivings there is no evidence that technical issues cannot be overcome. The allocation (now Site LUD01/C) is justified to help deliver the housing requirement. For effectiveness **MM62** replaces the existing policy and supporting text to clarify the capacity of the revised site and to set the site requirements including access, landscaping, layout, open space and necessary infrastructure.
111. Site LUD06/A (Land at Eastern End of Grange Road) has been allocated since 2011 without any development coming forward. The access is constrained by the presence of preserved trees and there is no evidence this can be overcome. In the absence of evidence that the allocation is deliverable it is not justified and should be removed from the plan, although it remains within the settlement boundary. **MM63** deletes the site.

MUNDESLEY

112. The submitted plan allocates Site MUN03/B (Land off Cromer Road & Church Lane), a field in the heart of the village and the FC proposed to extend this by allocating a further field to the south on Links Road with the area of railway embankment between used as open space. Both areas are well related to the built-up area and services of the village and the extended site (MUN03/A) is justified to help deliver the housing requirement. For effectiveness **MM64** replaces the existing policy and supporting text to clarify the capacity of the revised site and to set the site requirements including sensitivity to the Grade II listed All Saints Church and Mundesley Conservation Area, site access, landscaping, layout, a central area of open space and necessary infrastructure.

Conclusion

113. Subject to **MMs 37-44, 46-48, 50-64** and **MM 36** which amends the list of sites, the housing allocations and settlement boundaries in the plan are justified and consistent with national policy and the site-specific policies for the allocations are justified and would be effective.

Issue 5 – Whether the general housing policies in the plan are justified, consistent with national policy and would be effective

114. Policy HOU2 seeks to deliver the right mix of homes in the district given its specific housing needs and does this in the form of a table that sets out the various requirements and how they relate to the size of scheme proposed. The requirements cover the percentage of affordable housing, the mix of market housing, the mix of affordable housing, the number of serviced self-build plots and the amount of Elderly/Care provision.
115. Given high house prices in relation to average earnings, affordable housing is a particular priority of the plan. Due to the implications for viability, the district is divided into two zones, a higher value coastal zone (with Hoveton) where 35% affordable housing is required on large housing sites, and a lower value inland zone (including North Walsham and Fakenham) where 15% is required. To be justified and effective the policy table and supporting text require amendment for clarity, to remove ambiguity, to correct the relevant threshold to 10 dwellings (6 in the Designated Rural Area) and to remove references to First Homes.
116. The market housing mix specified in the policy is based on strategic evidence but is expressed as approximate percentages and only represents a starting point that can be varied according to site circumstances. The affordable housing mix is based on local need evidence and again forms a starting point. It is justified to require a small number of serviced plots on large housing sites to

meet local demand for self-build and custom housebuilding subject to release if not taken up.

117. Given the significantly aging population in the district the policy also requires schemes of over 150 dwellings to include specialist elderly/care provision which could include various types of sheltered housing or care home facilities. The requirement is specified in units, but provision will vary location by location depending on demand and need. The required units are converted to dwelling equivalents in Policy HOU1 at an average ratio of 1.5:1 until the form of elderly/care provision is established.
118. In the interests of effectiveness **MM23** makes the necessary changes to Policy HOU2 and its supporting text.
119. Policy HOU7 dealing with the re-use of rural buildings in the countryside should use the NPPF description 'redundant or disused buildings' to be consistent with national policy. The policy requirement for all structural elements to be retained is unduly excessive and insisting on compliance with the North Norfolk Design Guide would give it the status of development plan policy. To be justified a substantial proportion of structural elements should be retained and the design guide should be taken into account. **MM26** makes these changes.
120. Policy HOU6 relating to replacement dwellings and extensions similarly requires compliance with the design guide. To be justified **MM25** replaces this with a requirement to take it into account.
121. Policies HOU8 and HOU9 set requirements for the provision of accessible and adaptable homes and minimum space standards by adopting the relevant optional technical standards in the building regulations. This is based on the evidence set out in background papers 7 & 7.1 which demonstrate an existing shortage of accessible and adaptable homes, the increasing elderly population likely to require such homes, increasing prevalence of disability likely to require wheelchair user dwellings, and the significant proportion of new dwellings not meeting the nationally described space standards. As such, following viability testing, these policies require all new dwellings to meet the M4(2) standard, on large sites at least 5% to meet the M4(3) standard, and all new dwellings to meet the nationally described space standards.
122. These policies are therefore justified by the evidence, but Policy HOU9 should allow for exemptions if fully justified and HOU8 should allow for exemptions either for practicality or viability reasons. Further supporting text is necessary to explain how the M4(3) standard will be applied when the occupier is not known. In the interests of effectiveness **MM27** and **MM28** make these changes.

Conclusion

123. Subject to **MMs 23-28**, the general housing policies in the plan are justified, consistent with national policy and would be effective.

Issue 6 – Whether the policy for Gypsy, Traveller & Travelling Showpeople's Accommodation in the plan is justified, positively prepared, consistent with national policy and would be effective

124. Policy HOU5 as submitted seeks to meet the accommodation needs of gypsies, travellers and travelling showpeople in the district over the period 2016-36 with a criteria-based policy on the grounds that the needs assessment at the time showed that the requirement for further sites was likely to be small. However, the Norfolk-wide assessment concerned dates from 2017 with the fact-finding surveys being carried out earlier that same year. The most accurate projections of need in the assessment relate to the five-year period 2017-22, a period that ended over three years ago.
125. Due to the time taken to prepare and submit the plan, by the first set of hearings in early 2024 it was apparent that the evidence base underpinning Policy HOU5 had become out of date. By then the 2017 assessment was not sufficiently robust to assess future need to set pitch/plot targets in the plan as required by paragraph 9 of the December 2023 Planning Policy for Traveller Sites, nor, if necessary, to identify a supply of sites in accordance with paragraphs 10-11. The 2017 assessment also pre-dated the change in the definition of gypsies, travellers and travelling showpeople which was made in December 2023.
126. The Council therefore commissioned an updated study to assess need which was published as part of the FC. Using the 'ethnic' definition, this concludes that there is a requirement for an additional 11 pitches for gypsies and travellers during the plan period 2024-40, with 7 of these during the initial five-year period 2024-29. There is no requirement for additional plots for travelling showpeople. This confirms the requirement for further sites remains relatively small and can reasonably be met by a criteria-based policy that allows for new or expanded sites of an appropriate scale and nature to come forward during the plan period.
127. Amended wording pursuing this approach for Policy HOU5 and its supporting text was published as part of the FC and subsequently in the proposed MMs. No objections were received. **MM24** is necessary to ensure the policy is justified by up-to-date evidence based on the latest definition and to ensure consistency with national policy.

Conclusion

128. Subject to **MM24**, the policy for Gypsy, Traveller and Travelling Showpeople's Accommodation is justified, positively prepared, consistent with national policy and would be effective.

Issue 7 – Whether the economic policies and allocations in the plan are justified, positively prepared, consistent with national policy and would be effective

129. 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 protect 200 ha of existing employment land and 54 ha of undeveloped land on existing sites together with the allocation of 17 ha of new employment land in the various settlements across the district, 272 ha in all. There is much redevelopment of existing employment land as the needs of individual businesses change, but the scope for 71 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.
130. 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 paragraphs 59-62 above, 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 employment 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 together with the necessary flexibility required by paragraph 82(d) of the NPPF. This is particularly the case as Policy E3 allows for employment development outside designated areas if no suitable land is available within them.
131. **MM45** deletes the site at Holt and **MM49** deletes the site at North Walsham as these are undeliverable and no longer justified. With these adjustments and other minor amendments **MM29** updates Policy E1 and the overall employment land provision in the plan period 2024-40 to a total of 264 ha of which 55 ha is undeveloped land on existing sites and 8 ha is new allocated land.
132. An important contribution to the employment land in the district is provided by the 28.8 ha Tattersett Business Park, part of a former airbase which is allocated by Policy E1. Mainly previously developed land with some existing employment uses, the site provides an opportunity for perhaps larger scale uses unsuitable elsewhere subject to infrastructure and landscaping improvements. For effectiveness **MM65** is required to strengthen the policy with regard to protected species, nearby scheduled monuments and to raise the implications of the minerals safeguarding area.
133. Policy E3 as submitted supports employment development outside designated areas in circumstances where no suitable land is available within them. To be positively prepared the wording should be amended to better reflect the starting point that sustainable development should be permitted, to make the criteria more flexible and objective. For effectiveness the supporting text should also

specifically encourage new proposals well related to Holt given the loss of Site H 27/1. **MM30** makes the necessary changes.

134. Policy E5 requires signage and shopfront proposals to conform with the North Norfolk Design Guide but this gives it the status of development plan policy. **MM31** corrects this by requiring it be taken into account.
135. The tourist industry is important to the economy of the district and needs to be able to thrive and adapt to changing consumer trends. For the plan to be positively prepared, Policy E6 (1) should allow for new tourist accommodation, static holiday caravans and holiday lodges outside settlement boundaries provided they are small scale and well related to a settlement or existing business, also (3) relating to existing business expansion clarified to refer to static caravan and holiday lodge sites, not individual units. In (2), new hotels should be positively supported subject to the sequential approach, but following consultation, the sequential approach should not apply to enhanced facilities at existing hotels as this may prejudice their future. **MM32** makes these changes.
136. As submitted, Policies E6, E7 and E8 do not mention the economic benefits of new tourism development in order for these to be taken into account with any adverse impacts in determining any proposals. This does not imply constraints will be ignored and they should be fully mitigated where possible. For the plan to be positively prepared, this consideration should be added as a new criterion into each policy. **MMs 32-34** make this change.
137. In Policy E9 as submitted the necessary period for marketing to demonstrate that tourist accommodation is no longer viable is unclear and in the interests of effectiveness a period of 12 months should be specified. **MM35** makes this necessary change.

Conclusion

138. Subject to **MMs 29-35, MM45, MM49** and **MM65**, the economic policies and allocations in the plan are justified, positively prepared, consistent with national policy and would be effective.

Issue 8 – Whether the policies in the plan for climate resilient sustainable growth, well connected, healthy communities and the environment are justified, consistent with national policy and would be effective

Climate Resilient Sustainable Growth

139. The plan places particular emphasis on delivering climate resilient sustainable growth, both mitigating and adapting to climate change, not least because the district is affected more than most by an eroding coastline east of Cromer.

140. Policy CC2 encourages renewable energy production subject to a series of criteria and, based on landscape sensitivity, divides the district into broad wind energy zones which may be suitable for wind turbines. However, this is just a starting point and to be effective further supporting text is required to emphasise the other factors that must be taken into account, for example the impact on heritage assets and nature conservation sites. **MM2** makes this change.
141. Policies CC3 and CC4 in turn set energy and water efficiency standards for new dwellings to help mitigate and adapt to climate change. The former requires new dwellings to achieve a minimum 31% reduction in CO₂ emissions below the 2013 Target Emission Rate, which was subsequently included in the building regulations, whilst the latter adopts the higher optional standard for water use of 110 litres per person per day, recognising that North Norfolk is an area of water stress. Further national energy standards are anticipated shortly, but there is no justification for the arbitrary requirement for all dwellings and workplaces to be 'zero carbon ready' by 2035 nor for compliance with any locally adopted water standards when these are not yet known. The BREEAM very good standard may not be achievable for non-residential development in every case but should be met if at all possible. **MM3** and **MM4** make these changes to ensure the policy is justified.
142. Policies CC5 and CC6 relating to coastal change management and adaptation seek to control development within the coastal strip at risk of erosion over the next 100 years and allow the relocation inland of existing development which could be affected. For effectiveness both policies should refer to tourism/leisure uses and in the case of touring and static caravan pitches, the adaptation policy should allow the phased roll back of pitches to less vulnerable areas on a temporary basis. Following consultation, the necessity in Policy CC5(2e) for *substantial* benefits to be shown is not justified and should be deleted. This does not fundamentally alter the objective of the policy. **MM5** and **MM6** make these changes.
143. Policy CC8 requires residential development to provide electric vehicle charging points in accordance with a bespoke local standard but this is not justified and to be consistent with national policy should follow the building regulations. The policy also sets electric charging point standards for non-residential and tourism development which is justified given the rural nature of the district and, in the case of tourists, the likelihood of being away from home. However, these standards should be relaxed if they threaten scheme viability. To be justified and effective **MM7** makes the necessary changes to the policy.
144. Policy CC9 requires Biodiversity Net Gain, an area where policy has developed since the publication of the submission plan. For effectiveness and consistency with national policy, the policy should be updated by references to qualifying development, the small sites metric and include the biodiversity gain hierarchy. **MM8** makes these changes.

145. Policy CC13 protects the quality of the environment. For effectiveness and to be consistent with national policy **MM9** is required to ensure nutrient pollution from new overnight accommodation does not affect the integrity of European sites in the Broads and River Wensum catchments. This inserts a new clause requiring relevant schemes to demonstrate nutrient neutrality and supporting text to explain the issue and how it can be overcome. The Norfolk authorities have been working proactively together to facilitate a range of options including nature-based solutions and an environmental credit scheme.

Well Connected, Healthy Communities

146. The NPPF seeks to promote healthy communities and paragraph 96 joint working with health authorities. Policy HC1 responds by requiring a Health Impact Assessment (HIA) for large development proposals to ensure these issues are taken into account. Given the rural nature of the district a lower threshold of 250 dwellings for an HIA is justified, below which the healthy planning checklist procedure applies. There is no justification for a lower threshold for non-allocated sites. **MM11** makes these changes.
147. Policy HC2 sets out the policy for the provision of new open space on large residential sites but the definition of major development is inconsistent with national policy. **MM12** corrects this. For effectiveness, section (5) protecting visually important open spaces should be clarified and include circumstances when exceptions may be made. **MM12** inserts suitable criteria.
148. Two sites proposed for designation as Open Land Areas and thus protected by section (5) were the subject of particular objection. Land off Warren Road Kelling is privately owned and well screened from public view by trees. As such it serves no meaningful public amenity function. However, Blakeney Pastures, in at least three different ownerships, forms a single large open area in the heart of the village that makes a significant contribution to its character which justifies protection. The Open Land Area adjacent to Two Furlong Hill Wells should be deleted to reflect the housing allocation in the Wells Neighbourhood Plan. This and the Kelling changes to the Policies Map were published alongside the MMs.
149. Policy HC3 covers the provision and protection of local facilities. To be effective the marketing requirements in section 2(b) should be clarified and the viability of alternative modes of operation explored before the loss of facilities is permitted. **MM13** makes these changes to the policy.
150. Policy HC4 sets the general principles for infrastructure provision and developer contributions referencing the tests in NPPF paragraphs 55-58. However, the requirement for contributions to comply with supplementary planning documents gives them the status of development plan policy and is not justified, similarly the requirement for 'the highest viable level' of affordable housing is ambiguous and for effectiveness should simply refer to Policy HOU2. Police infrastructure

is not listed with other potential requirements such as healthcare and libraries but there is no valid distinction in principle and in every case any requirement would have to meet the NPPF tests.

151. The Plan Wide Viability Assessment tested a range of development typologies taking account of development values and costs, the impact of plan policies, and a competitive return to landowners and developers. This identifies two sub-markets, coastal and inland, which necessitate different affordable housing zones, but subject to this, the assessment shows that residential development is viable throughout the district and the policies in the plan would not undermine its delivery. However, Policy HC4 allows for a relaxation of normal requirements in individual cases if a lack of viability is proven by an assessment at application stage. For effectiveness, Section (6) should state plainly that all other proposals will need to be policy compliant. **MM14** makes this and the other changes.
152. Policy HC5 to secure 'fibre to the premises' should adopt the requirements of the building regulations to be consistent with national policy. **MM15** does this. Policy HC6 requires parking provision to comply with the North Norfolk Design Guide but this gives it the status of development plan policy. **MM16** corrects this by requiring it be taken into account and refers to Policy CC8.

Environment

153. Policy ENV1 sets the requirements for development in the Norfolk Coast NL and the broads. To be consistent with national policy the new statutory duty to further the purposes of designation should be included, and for effectiveness the policy for major development disapplied to any relevant allocations in this plan or a neighbourhood plan as the NPPF test will have been applied. **MM17** makes these changes.
154. For effectiveness, the policy test in Policy ENV3 relating to proposals in the Heritage & Undeveloped Coast should similarly be disapplied for proposals in this plan or a neighbourhood plan as the constraint will have been considered in principle. Policies ENV6 and ENV8 dealing with amenity and design respectively include the requirement to conform to the North Norfolk Design Guide but this gives it the status of development plan policy and should be reworded to require it to be taken into account. Finally, Policy ENV7 regarding the historic environment should include a balancing exercise in Section (7) to be consistent with national policy. **MMs 18, 19, 21 and 20** respectively make these changes.

Conclusion

155. Subject to **MMs 2-9** and **MMs 11-21** the policies in the plan for climate resilient sustainable growth, well connected, healthy communities and the environment are justified, consistent with national policy and would be effective

Overall Conclusion and Recommendation

156. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I cannot recommend adoption of it as submitted in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

157. However, the Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the North Norfolk Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

David Reed

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.