

Planning Policy & Built Heritage Working Party



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Friday, 28 July 2023

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the **Council Chamber - Council Offices** on **Monday, 7 August 2023** at **10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to notify the committee clerk before 10am on the Thursday before the meeting and arrive at least 15 minutes before the start of the meeting. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public.

Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516108, Email: Lauren.Gregory@north-norfolk.gov.uk.

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

Please note that this meeting is livestreamed:
<https://www.youtube.com/channel/UCsShJeAVZMS0kSWcz-WyEzg>

Please note that Committee members will be given priority to speak during the debate of agenda items

Emma Denny
Democratic Services Manager

To: Cllr A Brown, Cllr G Bull, Cllr M Batey, Cllr N Dixon, Cllr P Fisher, Cllr M Hankins, Cllr P Heinrich, Cllr V Holliday, Cllr L Paterson, Cllr J Punchard, Cllr J Toye and Cllr A Varley

All other Members of the Council for information.
Members of the Management Team, appropriate Officers, Press and Public



If you have any special requirements in order to attend this meeting, please let us know in advance
If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

1 - 8

To approve as a correct record the Minutes of a meeting of the Working Party held on Monday 10th July 2023.

4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

5. DECLARATIONS OF INTEREST

9 - 14

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

6. HOLT NEIGHBOURHOOD PLAN REPORT

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Holt Neighbourhood Plan (HNP)	
Executive Summary	The purpose of this report is to formally “make” the Holt Neighbourhood Plan as part of the statutory Development Plan for North Norfolk. The Plan was subject to independent examination and successful referendum on the 29th June 2023. The Council has a legal duty to “make” the neighbourhood plan within 8 weeks of the day after the referendum was held unless it considers that doing so would breach European Union Obligations.

<p>Options considered</p>	<ol style="list-style-type: none"> 1. Bring the Referendum version of the Holt Neighbourhood Plan, HNP into effect on the 25th August 2023. This would mean that the HNP forms part of the council's statutory Development Plan for North Norfolk and be a material consideration in the determination of planning applications in the identified Holt Neighbourhood Plan Area. 2. To not bring the Holt Neighbourhood Plan into effect. This would mean that the Holt Neighbourhood Plan would not form part of the Development Plan for North Norfolk and would not become a material consideration in the determination of planning applications.
<p>Consultation(s)</p>	<p>Earlier iterations of the Holt Neighbourhood Plan have undergone public consultation under Regulation 14 and 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The submitted version of the neighbourhood plan has undergone independent examination and the final modified version has been subject to a public referendum in accordance with Paragraph 12(4) of Schedule 4B to the Town and Country Planning Act 1990 on the 29th June 2023.</p>
<p>Recommendations</p>	<ol style="list-style-type: none"> 1. Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that having been subject to successful local referendum; <ol style="list-style-type: none"> a. The Holt Neighbourhood Plan be made (brought into force) as part of the statutory Development Plan for North Norfolk in accordance with section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended) on the 25th August 2023; b. The issuing of the Decision Statement required under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in order to bring to the attention of the qualifying body, the people who live, work and or carry out business in the Neighbourhood Plan Area is delegated to the Assistant Director of Planning in conjunction with the Planning Policy Team Leader; 2. Acknowledge that the required consequential amendments to the adopted policies map and the required minor consequential changes to the referendum version of the neighbourhood plan through delegated powers to the Planning Policy Team Leader.

Reasons for recommendations	<p>All Neighbourhood Development Plans are required to gain a majority of those voting in favour (50% plus) at a local referendum in order to proceed and be considered for adoption by the Local Planning Authority. If the Plan receives a positive result, then the local planning authority has a legal duty to bring the plan into force within an eight-week period following the day after the referendum was held, unless it considers that doing so would breach European Union Obligations.</p> <p>The Holt Neighbourhood Development Plan is considered to meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and be compatible with EU obligations as incorporated into UK law and the Convention rights and complies with relevant provision made by or under Section 38A and B of the Planning and Compulsory Purchase Act 2004 (as amended).</p>
Background Papers	Further supporting evidence, The Referendum version of the HNP, the examiner's report and associate notices can be found for reference at Home Holt Neighbourhood Plan (north-norfolk.gov.uk)

Wards Affected	Holt
Cabinet Member (s)	Cllr Andrew Brown, Portfolio holder for Planning
Contact Officer	Neighbourhood Plan lead: - Iain Withington, Planning Policy Team leader. iain.withington@north-norfolk.gov.uk

Links to key documents:

Corporate Plan	Quality of Life
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Adopted and emerging Local Plan/ Development Plan

Corporate Governance	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	N/A

Horning Knackers Wood Updated Joint Position Statement	
Executive Summary	The report updates Members on the revised. Joint Position Statement with regard to the Horning Knackers Wood Water Recycling Centre catchment.
Options considered	None
Consultation(s)	The updated Joint Position statement has been undertaken collaboratively with the Broads Authority, Environment Agency, Anglian Water and NNDC
Recommendations	It is recommended that Members of the Planning Policy & Built Heritage Working Party note the contents of the updated Joint Position Statement and recommend to Cabinet that it authorises the Assistant Director of Planning in conjunction with the Planning Policy Team Leader as signatory to the updated JPS and incorporation of any minor changes as a result of EA or other LPA sign off process.
Reasons for recommendations	To provide updated planning guidance for the District.
Background papers	2017 Joint position Statement re Horning Knackers Wood Wastewater recycling centre and the updated Anglian Water position through the Anglian water Statement of Fact

Wards affected	Horning
Cabinet member(s)	Andrew Brown Portfolio holder for Planning
Contact Officer	Iain Withington Planning Policy Team Leader iain.withington@North-Norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Local homes for local need theme of the Council's Corporate Plan 2019- 2023 and the cross-cutting delivery mechanism through the emerging Local Plan
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	The Councils Development Plan: including the Core Strategy and emerging Local Plan

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	Previous Joint Position Statement was agreed between the Broads authority, Environment Agency, Anglian Water and NNDC in 2017.

Weight to be given to the Emerging Local Plan	
Executive Summary	The purpose of this report is to consider what weight (if any) in the determination of Planning applications the Council may give to relevant policies of the emerging Local Plan ahead of examination in line with paragraph 48 of the National Planning Policy Framework
Options considered.	<ul style="list-style-type: none"> • Make recommendations to Cabinet to apply weight as detailed in Appendix 1 • Make recommendations to Cabinet to continue to rely on the 2008 Core Strategy and 2011 Site Allocations Development Plan Document and apply limited weight to the emerging Local Plan on a case-by-case basis. <p>o Where specific policies of the emerging Plan have been relied upon by an applicant, recommend the continuation of the position that weight can only be given on a case-by-case basis having regard to paragraph 48 of the Framework and the level and nature of any objection.</p>
Consultation(s)	The Local Plan has been subject to a number of external consultations in line with statutory requirements and been developed through collaborative internal engagement and Member steer through the Planning Policy & Built Heritage Working Party. Full Council authorisation for the submission of the Plan for independent examination was received on 1.3.23
Recommendations	<p>Planning Policy & Built Heritage Working Party recommend to Cabinet that</p> <p>As soon as reasonably practical weight is given the emerging Plan policies in line with para 48 of the NPPF as detailed in appendix 1.</p>
Reasons for recommendations	<p>The Local Plan is now at an advanced stage of production having been submitted for independent examination and updates many of the policies in the Development Plan to align with the more recent NPPF and corporate /national agenda.</p> <p>The NPPF advises that local planning authorities may give weight to relevant policies in emerging local plans according to</p> <ul style="list-style-type: none"> a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given); b) the extent to which there are unresolved objections to

	relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given). (para 48)
Background Papers	Submission version of the Local Plan and all background papers and supporting evidence are published and available on the Councils new Local Plan examination Library Home Local Plan Examination (north-norfolk.gov.uk)

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown: Portfolio Holder for Planning
Contact Officer	Iain Withington. Planning Policy Team leader

Links to key documents:	
Corporate Plan:	Production of the Local Plan is a cross cutting theme in regard delivery of the Corporate Plan's priorities.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Core Strategy and Site Allocations Development

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	None

Adoption of Coastal Adaptation Supplementary Planning Document	
Executive Summary	<p>The purpose of this report is to recommend the adoption of the Coastal Adaptation Supplementary Planning Document (SPD).</p> <p>The Coastal Adaptation SPD supports the implementation of existing and emerging planning policies relating to development within the Coastal Change Management Areas (CCMA), as well as, rollback and relocation away from the coast.</p> <p>The SPD provides overarching planning guidance in relation to the economic, social and environmental impacts of coastal change; the national and local policy frameworks; advice about different types of development within the CCMA; rollback and relocation; enabling development; and, case study examples of coastal adaptation. In addition, the SPD includes guidance and templates for Coastal Erosion Vulnerability Assessments and example planning conditions.</p> <p>Appendices are available https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13715&path=0</p>
Options considered	<ul style="list-style-type: none"> • Make recommendations to Cabinet to adopt the Coastal Adaptation SPD. • Make recommendations to Cabinet to not adopt the Coastal Adaptation SPD and continue to implement planning policies with the existing North Norfolk Development Control Guidance, Development and Coastal Erosion, April 2009.
Consultations	<p>The Coastal Adaptation SPD has been subject to public consultation during its preparation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (April 2021).</p> <p>The list of consultees, respondents, summaries of their comments and how these have been responded to, can be found in the Consultation Statement which is appended to this report at Appendix B.</p>
Recommendations	<ul style="list-style-type: none"> • To recommend to Cabinet that the Coastal Adaptation SPD is adopted. • That the Planning Policy Manager, in consultation with the Portfolio Holder for Planning, is authorised to make any presentational or typographical amendments to the Coastal Adaptation Supplementary Planning Document prior to it being published.

Reasons for recommendations	To provide guidance on the implementation of planning policies through a whole coast approach, from Holkham in Norfolk to Languard Point, Felixtowe, Suffolk.
Background papers	<p>North Norfolk Core Strategy 2008 Core Strategy Core Strategy (incorporating Development Control Policies) Adopted 2008 (north-norfolk.gov.uk)</p> <p>North Norfolk Local Plan Proposed Submission Version Proposed Submission Version (Regulation 19 Publication) Local Plan (north-norfolk.gov.uk)</p> <p>Appendices are available https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13715&path=0</p>

Wards affected	All Wards
Cabinet member(s)	Cllr. Andrew Brown, Portfolio Holder for Planning
Contact Officer	Caroline Dodden, Senior Planning Officer caroline.dodden@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Supports delivery of the objective to continue to take a lead role nationally in coastal management initiatives recognising our position as a “frontline” authority in meeting the challenge of rising sea levels.
Medium Term Financial Strategy (MTFS)	Not Applicable.
Council Policies & Strategies	<p>Statement of Common Ground on Coastal Zone Planning, September 2018: https://www.north-norfolk.gov.uk/media/8993/g4-norfolk-suffolk-coastal-authorities-socg-coastal-zone-planning.pdf</p> <p>North Norfolk Development Control Guidance, Development and Coastal Erosion, April 2009: Development Control Guidance Note: Coastal Erosion Risk (north-norfolk.gov.uk)</p> <p>North Norfolk Core Strategy, September 2008: Core Strategy (incorporating Development Control Policies) Adopted 2008 (north-norfolk.gov.uk)</p> <p>North Norfolk Local Plan Proposed Submission Version, January 2022: https://www.north-norfolk.gov.uk/media/7466/local-plan-proposed-submission-version-reg-19-publication.pdf</p>

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	<p>17 August 2020: Members of the PPBHWP noted the Initial Consultation Document with regards to the production of a joint Coastal Adaptation SPD, which was presented for information purposes.</p> <p>14 November 2022: Members of the PPBHWP recommended to Cabinet that the draft Coastal Adaptation SPD be published for formal consultation.</p>

10. NORTH WALSHAM DEVELOPMENT BRIEF PUBLIC CONSULTATION

129 - 182

North Walsham Development Brief Public Consultation	
Executive Summary	This report seeks agreement to publish a draft version of a Development Brief for the large-scale urban extension at North Walsham for a period of public consultation.
Options considered.	The Planning Policy and Built Heritage Working Party has previously considered the methods and time periods for consultation.
Consultation(s)	<p>The Local Plan has been subject to a number of external consultations in line with statutory requirements and been developed through collaborative internal engagement and Member steer through the Planning Policy & Built Heritage Working Party. Full Council authorisation for the submission of the Plan for independent examination was received on 1.3.23.</p> <p>The Authority has previously consulted on the scope of a Development Brief, a draft Master Plan, Vision, and set of high-level development principles. The Draft Development Brief builds on these previous themes.</p>
Recommendations	Members agreed the Draft version of the North Walsham West Development Brief as a basis for a period of public consultation.
Reasons for recommendations	<p>The Local Plan is now at an advanced stage of production having been submitted for independent examination.</p> <p>Preparation and approval of a Development Brief is a policy requirement of the site allocation in the Local Plan. Its preparation will be a key indicator of the site's deliverability.</p>

	The content of the Brief should be informed by comprehensive and inclusive engagement with stakeholders.
Background papers	Submission version of the Local Plan and all background papers and supporting evidence including the previous consultation documents for North Walsham are published and available on the Councils new Local Plan examination Library Home Local Plan Examination (north-norfolk.gov.uk)

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown: Portfolio Holder for Planning
Contact Officer	Mark Ashwell, Planning Policy Manager

Links to key documents:	
Corporate Plan:	Production of the Local Plan is a cross cutting theme in regard to delivery of the Corporate Plan's priorities.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Core Strategy and Site Allocations Development Plan Documents. Housing Strategy
Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	None

11. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

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PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 10 July 2023 at the Council Chamber - Council Offices at 10.00 am

Committee Cllr G Bull (Vice-Chairman – deputising as Chairman for the meeting)

Members Present:

Cllr M Batey

Cllr N Dixon

Cllr V Holliday

Cllr J Punchard

Cllr P Heinrich

Cllr L Paterson

Cllr J Toye

Members in attendance:

Cllr W Fredericks

Cllr A Fitch-Tillett

Officers in Attendance:

Planning Policy Manager (PPM)

Democratic Services Officer - Regulatory

9 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr A Brown (Chairman), Cllr P Fisher, Cllr M Hankins and Cllr A Varley. Cllr G Bull deputised as Chairman for the meeting.

10 PUBLIC QUESTIONS

None received.

11 MINUTES

The minutes of the Planning Policy & Built Heritage Working Party meeting held Monday 12th June 2023 were approved as a correct record.

12 ITEMS OF URGENT BUSINESS

None.

13 DECLARATIONS OF INTEREST

The Chairman declared a non-pecuniary interest in Agenda Item 7, he is a Local Member for North Walsham, but confirmed that he remained open minded on this matter.

14 LOCAL PLAN UPDATE: EXAMINATION PROCESS

- i. The PPM introduced the Officer's report and recommendation. Since the submission of the Local Plan the Inspector had been appointed and sought clarification on various issues. The PPM anticipated more questions would be raised in relation to other policy areas over the next few weeks leading into the examination hearings.

The PPM sought delegated authority to respond to the Planning Inspector in

the first instance, and confirmed that he intended to take soundings from the Planning Portfolio holder when responding. In approving the recommendation, this would ensure that responses were made in a timely manner, and prevent the potential challenge that the Officer responding the Inspector did not have the proper authority to do so.

The PPM affirmed that the questions provided in Appendix A were supplied as demonstratives, and it was not asked that Members respond to the Inspectors questions supplied at this meeting.

- ii. Cllr J Toye considered the approach set out by the PPM to be sensible, noting that there was huge flux within planning presently including matters of Nutrient Neutrality which the Prime Minister had indicated may be revised. He stated he would like for the Working Party to be regularly updated as to the progress of the Local Plan, as appropriate. Cllr J Toye proposed acceptance of the Officer's recommendation.
- iii. The PPM agreed that he would table a general standing item on the Local Plan for the Working Party.
- iv. Cllr P Heinrich asked, with respect of National Housing Target's, what the current government position was.
- v. The PPM advised that the Local Plan included 2 housing figures, a minimum figure based on the 2016 household forecast and a second higher figure which Officer's argued the plan was capable of delivering.

The current requirement was that Councils should use the standard government methodology to calculate the minimum figure. NNDC did not use this methodology and so were at odds with the current government guidance. One of the emerging proposals in the Levelling Up and Regeneration Bill, presently undergoing consultation, was the removal of this requirement and wording added to the NPPF to include 'unless exceptional circumstances apply'.

The PPM confirmed that the outcome of the consultation was not yet known, and it was uncertain what the future of housing targets would be. All Local Authorities were still working towards the central housing targets. The PPM remarked that by the time the hearings take place that the targets may have changed.

He commented that it was unsurprising that the Planning Inspector had raised questions about the housing figures. Officers would work to defend the lower figure, set by the Council, and justify reasons for departure from the standard methodology. The Inspector may be minded to consider alternate figures and confirm what that Councils' position would be if the housing figure was modified. The PPM advised in such instance, he would not respond to the Inspector without first speaking with the Portfolio Holder.

- vi. Cllr J Punchard stated it seemed eminently sensible to move the plan back, as questioned by the Inspector, though stressed it was important the council be conscious of the impact this may have on individual policies and matters i.e. renewable energy infrastructure.
- vii. The PPM confirmed that he would look to review each individual policy when

considering the Inspector's question about pushing back the plan dates. Certainly, the Council would not wish to be working to today's standards in 2040 with respect renewable energy, as there was an expectation that things would improve.

- viii. Cllr V Holliday expressed her support for the Officer's recommendation and for the Working Party being provided regular updates. She sought clarity whether some of the decisions would be brought back to the Working Party.
- ix. The PPM advised, as a back stop position, that he would return items to the Working Party should the Inspector recommend substantial modifications, which may otherwise find the Plan unsound. In the first instance the PPM would consult with the Portfolio Holder, before going to the Working Party for further endorsement.

In the event that the Planning Inspector considered the need for substantial modification, they would likely adjourn the hearing for a number of weeks or months to enable the Council to form a revised view. Such a shift in policy would go out to public consultation. The PPM affirmed that it was highly likely that there would be further public consultations in relation to the modifications already scheduled.

- x. Cllr N Dixon agreed with the proposed delegation to the PPM and reflected on the prior two cycles of Local Plan examination, to which he had been a Member, that there was a lot of routine matters which the PPM should be able to answer without difficulties. He stated that those issues which fell out of this scope and were far broader reaching, should not only return to the Working Party but to Cabinet also.

Cllr N Dixon noted that previously the Working Party had not been chaired by the Portfolio Holder for Planning and considered the process for referral may be more robust if wording be added to the recommendation that the PPM be delegated authority in consultation with the Portfolio Holder 'and the Chairman of the Planning Policy & Built Heritage Working Party'. This would cover off a potential scenario in which the Portfolio Holder was not the Chairman, and would allow for the Vice-Chairman of the Working Party to deputise should the Chairman be unavailable.

With regards the questions raised by the Inspector, Cllr N Dixon reserved his judgement till the full implications were known for extending the plan period. Similarly, with respect Nutrient Neutrality the plan for full mitigation delivery was work in progress. He considered more information was needed in order to form a meaningful response.

- xi. Cllr W Fredericks welcomed that the Council would be able to put forward their case to the Planning Inspector, particularly with respect of housing targets and social housing. She noted that 4 million homes needed to be built nationally to meet current demand. Cllr W Fredericks asked what support would be given to the Local Authority in delivering house building, and commented that the developer controlled whether delivery was achieved. She expressed concern that developers would not deliver on affordable homes, and may potentially block land for development until such time it was in the developer's interest.
- xii. The PPM advised the higher figure in the plan enabled a failure contingency

in the event that some sites weren't delivered. He commented that the Local Authority had some influence on build out rates of permitted decisions, in granting permission subject to delivery of the development in 18 months (by way of an example). Further, the government could incentivise development through changes to taxes, use of grants or subsidies. Ultimately, the Local Authority had little power to directly intervene in market failure. The PPM advised that the Planning Inspector would carefully consider the deliverability of sites, review the history of the site, ownership, financing and viability to determine if there was a 'realistic prospect' of the site being built in the timeframe specified.

- xiii. Cllr J Toye agreed with the principle of Cllr N Dixons amendment, but considered the inclusion of the 'Vice Chairman' was too prescriptive, rather, he would consider the Portfolio Holder should gather soundings from the Working Party or Local Members more broadly when forming a view.
- xiv. The PPM advised the wording would be for the inclusion of the 'Chairman of the Working Party' with the expectation that the Vice-Chairman would deputise in the event that the Chairman was unavailable for an extended period of time under the constitutional arrangements.

The PPM commented that that questions tabled were offered as an example, and he had not anticipated Members to form a response. Following Members commented he advised he would, if permitted, respond to the Inspector and report back to the Working Party as to how he had responded. He reiterated that there would be significant time delays without delegated power to respond.

- xv. Cllr N Dixon reflected that the situation was worse than Cllr W Fredericks described. First, there may be a situation in which no planning applications are received despite inclusion of sites in the Local Plan. Second, the delivery of approved planning applications rested with the applicant or central government, not the Local Authority. The 4 million homes figure was that required today, but this figure was likely to increase as it was being delivered and therefore was 4 million plus. Cllr N Dixon commented that the 4 million homes was the symptom, not the cause of the problem, and cautioned treating the symptoms without addressing the underlying cause. Should Central Government decide to intervene it would effectively become the market maker, a very different role and one with political difficulties. Cllr N Dixon concluded in stating that he was mindful that there were no easy solutions.
- xvi. Cllr J Toye accepted the Officers recommendation with the amendment put forward by Cllr N Dixon. Cllr P Heinrich seconded the recommendation

UNANIMOUSLY RESOLVED

That Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that delegated authority is given to the Planning Policy Manager in consultation with the Planning Portfolio Holder and Chairman of the Planning Policy & Built Heritage Working Party to respond to the Inspectors questions prior to and during the Examination hearings.

15 NORTH WALSHAM WEST DEVELOPMENT BRIEF: CONSULTATION PROPOSALS

- i. The PPM introduced the Officers report and recommendation, noting that a significant proportion of the homes proposed in the Local Plan would be achieved through the North Walsham West Development (NWWD). Should the Inspector consider the NWWD unviable, it was expected the whole Plan would fail. The PPM advised, to demonstrate to the Inspector that the NWWD was achievable, a development brief must be prepared, and this would require significant resourcing from the Local Authority and the Consortium.

The PPM confirmed Members were asked to consider the consultation arrangements and not the brief itself. He did not intend to present the full development brief to Members till after the public consultation, though would present a draft version at the next Working Party for endorsement of the public consultation only. He commented that the Consultation arrangements proposed was broadly similar to the Consultation for the Local Plan, with a timetable of events set out in the agenda pack.

- ii. Cllr P Heinrich stated he was not opposed the NWWD provided specific criteria were met. He expressed serious concern that the Working Party, nor Local Members had, to date, been provided with the proposed development brief, further North Walsham Members had not had any real input into the brief despite asking 4 years ago to be involved. He considered that the brief would therefore effectively be a creature of the Consortium, given the limited input from Members. With respect of the proposed timetable, Cllr P Heinrich detailed his reservations that the majority of the consultation would take place in August when the public may be on holiday and unable to fully engage with the process. He considered it more appropriate that the consultation be pushed back to September and early October, else the Council be accused of arranging a nominal consultation only and not a detailed evaluation of the scheme by residents.

As Local Member, and without having seen the development brief, Cllr P Heinrich stressed the critical importance of the Cromer Road linking to the Industrial Estate which had been debated in full by the Working Party and at North Walsham Town Council. Additionally, as Portfolio Holder for Economic growth he noted the economic benefits which would be enabled through the link road, in an area of the district with limited employment land. Cllr P Heinrich affirmed that the road would be at a considerable cost with estimates of 21 million, likely only go up, and commented that he would like to see that this matter be looked at totally independently.

Whilst not opposed to the consultation in principle, Cllr P Heinrich considered the timing was wrong, and affirmed that the Working Party and Local Members needed to have seen and understood the development brief before commencement of the consultation.

- iii. Cllr V Holliday agreed that the proposed timeline was inappropriate, falling in August, and expressed her concern over the use of a flyer for a complex subject matter requiring high levels of detail. Further, she noted not all residents were online, and some may not read leaflets coming through the post, therefore a multifaceted approach was required. Cllr V Holliday argued that a hard copy of the survey should be sent to all North Walsham residents

to ensure maximum participation, and that she was currently unconvinced with that proposed.

- iv. Cllr N Dixon stated he was sympathetic with the views raised by Cllr P Heinrich and sought confirmation when the development brief would be available, and when this would be a complete piece of work. He stated it was important that this be published in good time to ensure everyone could consider, digest and understand its contents, only then would individuals be able to participate in a meaningful consultation. Cllr N Dixon suggested extending the end date by another 3 weeks to increase participation.
- v. The PPM stated it would be beneficial to make available to the Inspector a development brief which had been subject to public consultation by the time examination hearings commence. The further along the process, the better the delivery credentials of the NWWD scheme would be. Officers had worked backwards from an expected examination date (end of September) to achieve a consulted upon brief. The PPM conceded that Members were being asked to go out to consultation on something they had not seen and accepted Members concerns. He advised that the development brief would have been tabled at the meeting, had it been complete, but there was still work ongoing and it was anticipated that the brief would be presented at the next meeting of the Working Party. Before the next meeting he confirmed he would arrange meetings with the Local Member's to ensure they had early sight of the brief ahead of the Working Party Meeting. The PPM acknowledged the NWWD development brief and consultation required a significant amount of work, and he was keen to get an indication from Members how to proceed. Subject to approval at the August Working Party to go out to consultation, the PPM commented it would be reasonable to start the consultation process in the middle of August and extend through to the end of September, pending engagement with Local Members and Members more broadly before the meeting, with the PPM noting that there was winder interest for NWWD. Should the brief be unavailable for the August meeting, the timetable would need to shift.
- vi. Cllr W Fredericks asked, as Chairman of the Health and Wellbeing partnership for North Norfolk, if the brief would detail what accompanying infrastructure would feature within the development including water, schools and doctors surgeries. She asked that the Health and Wellbeing partnership be consulted on the NWWD development brief.
- vii. The PPM advised the latest version was over 100 pages, though commented this would be edited down before publication, and would comprehensively cover all aspects set out by Cllr W Fredericks. The PPM stressed that the development brief was an intermediate document, not a planning application, setting out the principle for development. The consultation would be made available to all the relevant health organisations, and other key stakeholders, who would be able to contribute to a final draft.
- viii. Cllr P Heinrich thanked the PPM for his compromised solution in delaying the consultation period to avoid the summer season and to enable Members to meet with the PPM to see and discuss the draft brief.
- ix. Cllr J Toyne queried whether one half day in person afternoon and evening event would be sufficient, given working people's availability. Additionally, he commented the use of QR codes could be proliferated across the documents

to increase information sharing.

- x. The PPM noted the practical and mechanical issues raised by Members with regard the consultation, which he considered to be useful modifications to be factored in to the revised timetable. The PPM considered he had been provided clear guidance as to Member's current position, and pragmatically recommended Members defer further consideration of the NWWD and consultation until the next meeting. The PPM stressed he would not ask Member's to endorse the content of the brief till after a public consultation exercise, rather he would seek confirmation Members were comfortable to go out to consultation.
- xi. The Chairman asked whether the drafted flyers would be seen by Members before being made available. He stated he would not be comfortable endorsing the publication of the flyer without reviewing its contents. As a Local Member for North Walsham he understood the depth of feeling from residents. The Chairman commented it would be crazy for Members to agree to a consultation without first seeing the brief.
- xii. The PPM confirmed flyers would not be dispatched till Members had seen them. He advised most of the content of the flyer would remain unchanged should the recommendation be deferred till the following month. Significant resource would go into the design of the flyer and of the public documents, this preparation could be done in advance of the next meeting.
- xiii. Cllr N Dixon proposed deferment, Cllr J Toye seconded.

IT WAS UNANIMOUSLY RESOLVED

That the item be deferred to the next meeting of the Planning Policy & Built Heritage Working Party.

16 EXCLUSION OF PRESS AND PUBLIC

None.

The meeting ended at 11.09 am.

Chairman

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Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in "The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012". You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

"Disclosable Pecuniary Interest" means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

"Partner" means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
 - a. your own financial interest or well-being;
 - b. a financial interest or well-being of a relative, close associate; or
 - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
 - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
 - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land and Property	<p>Any beneficial interest in land which is within the area of the council.</p> <p>'Land' excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
Licenses	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
Corporate tenancies	<p>Any tenancy where (to the councillor's knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
Securities	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were</p>

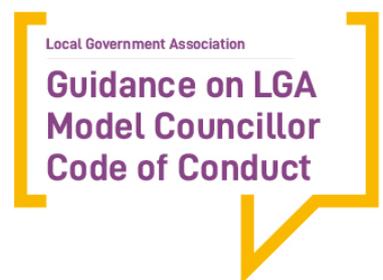
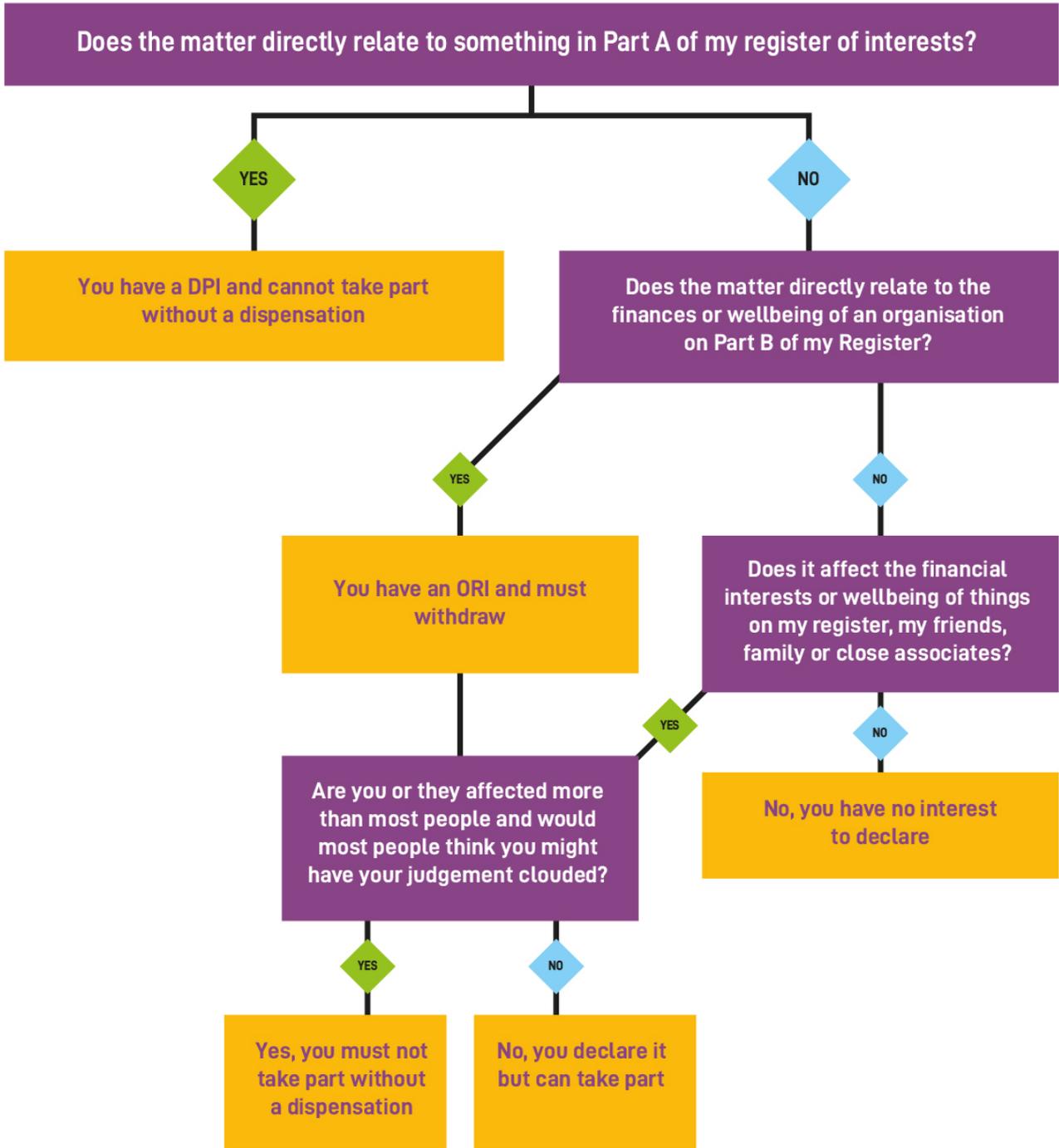
	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

Table 2: Other Registrable Interests

<p>You have a personal interest in any business of your authority where it relates to or is likely to affect:</p> <ul style="list-style-type: none"> a) any body of which you are in general control or management and to which you are nominated or appointed by your authority b) any body <ul style="list-style-type: none"> (i) exercising functions of a public nature (ii) any body directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)
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REPORT TITLE	Holt Neighbourhood Plan (HNP)
Executive Summary	The purpose of this report is to formally “make” the Holt Neighbourhood Plan as part of the statutory Development Plan for North Norfolk. The Plan was subject to independent examination and successful referendum on the 29 th June 2023. The Council has a legal duty to “make” the neighbourhood plan within 8 weeks of the day after the referendum was held unless it considers that doing so would breach European Union Obligations.
Options considered.	<ol style="list-style-type: none"> 1. Bring the Referendum version of the Holt Neighbourhood Plan, HNP into effect on the 25th August 2023. This would mean that the HNP forms part of the council’s statutory Development Plan for North Norfolk and be a material consideration in the determination of planning applications in the identified Holt Neighbourhood Plan Area. 2. To not bring the Holt Neighbourhood Plan into effect. This would mean that the Holt Neighbourhood Plan would not form part of the Development Plan for North Norfolk and would not become a material consideration in the determination of planning applications.
Consultation(s)	Earlier iterations of the Holt Neighbourhood Plan have undergone public consultation under Regulation 14 and 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The submitted version of the neighbourhood plan has undergone independent examination and the final modified version has been subject to a public referendum in accordance with Paragraph 12(4) of Schedule 4B to the Town and Country Planning Act 1990 on the 29th June 2023.
Recommendations	<ol style="list-style-type: none"> 1. Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that having been subject to successful local referendum; <ol style="list-style-type: none"> a. The Holt Neighbourhood Plan be made (brought into force) as part of the statutory Development Plan for North Norfolk in accordance with section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended) on the 25th August 2023; b. The issuing of the Decision Statement required under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in order to bring to the attention of the qualifying body, the people who live, work and or carry out

	<p>business in the Neighbourhood Plan Area is delegated to the Assistant Director of Planning in conjunction with the Planning Policy Team Leader;</p> <p>2. Acknowledge that the required consequential amendments to the adopted policies map and the required minor consequential changes to the referendum version of the neighbourhood plan through delegated powers to the Planning Policy Team Leader.</p>
Reasons for recommendations	<p>All Neighbourhood Development Plans are required to gain a majority of those voting in favour (50% plus) at a local referendum in order to proceed and be considered for adoption by the Local Planning Authority. If the Plan receives a positive result, then the local planning authority has a legal duty to bring the plan into force within an eight-week period following the day after the referendum was held, unless it considers that doing so would breach European Union Obligations.</p> <p>The Holt Neighbourhood Development Plan is considered to meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and be compatible with EU obligations as incorporated into UK law and the Convention rights and complies with relevant provision made by or under Section 38A and B of the Planning and Compulsory Purchase Act 2004 (as amended).</p>
Background papers	<p>Further supporting evidence, The Referendum version of the HNP, the examiners report and associate notices can be found for reference at Home Holt Neighbourhood Plan (north-norfolk.gov.uk)</p>

Wards affected	Holt
Cabinet member(s)	Cllr Andrew Brown, Portfolio holder for Planning
Contact Officer	Neighbourhood Plan lead: - Iain Withington, Planning Policy Team leader. iain.withington@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Quality of Life
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Adopted and emerging Local Plan/ Development Plan

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	N/A

1. Purpose of the report

- 1.1 **The purpose** of this report is to seek authority to bring into effect and “make” the Holt Neighbourhood Plan, HNP, as part of the statutory Development Plan for North Norfolk in accordance with section 38A (4) of the Planning and Compulsory Purchase Act 2004. In doing so the Holt Neighbourhood Plan will be a material consideration in the determination of planning applications in the identified Holt Neighbourhood Plan Area.

2. Introduction & Background

- 2.1 The provisions of the Localism Act 2011 introduced new powers to allow local communities to prepare Neighbourhood Development Plans and shape future development within their area. North Norfolk District Council positively supports communities to be involved in producing a Neighbourhood Development Plan and actively encourages community led development. Holt town council as the “qualifying body” have been preparing the neighbourhood plan since the application for the designation of the parish as a Neighbourhood Planning Area was approved by the Cabinet in December 2013. The Plan is the third parish/town Council to bring forward a successful Neighbourhood Plan in the District and to reach this formal ‘adoption’ stage.
- 2.2 Neighbourhood Plans should be bespoke and specific, addressing land use planning issues at a local level in support of and in general conformity with the strategic policies of the North Norfolk Local Plan. They should not promote less development than set out in the strategic policies for the area and should actively seek opportunities to allocate additional growth and provide more locally derived policies based on appropriate evidence. The policies can help shape sustainable development by influencing local planning decisions as part of the statutory Development Plan.
- 2.3 All Neighbourhood Plans are required to be legally compliant and meet a set of requirements referred to as ‘the basic conditions’ under schedule 4B section 8 of the Town and Country Planning Act 1990 (as amended); these are that they:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;

- are in general conformity with the strategic policies contained in the development plans for the area (Herefordshire Local Plan – Core Strategy);
 - do not breach, and be otherwise compatible with EU obligations;
 - are not likely to have a significant effect on a European site either alone or in combination with other plans or projects.
- 2.4 An earlier version of the emerging neighbourhood plan underwent formal public consultation under regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in January/ February 2018.
- 2.5 Following a significant revision, the emerging draft neighbourhood plan was submitted to the Council for independent examination on the 12th September 2022 and the submitted plan was publicised under regulation 16 between 10th October and 21st November 2022.
- 2.6 The draft neighbourhood plan was subject to independent examination and a report issued by the independent Examiner on 28th February 2023. The examiner’s report recommended that subject to the incorporation of necessary modifications, including consequential changes to the supporting text the Draft Neighbourhood Development Plan met the ‘basic conditions’ and the other matters set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 and should proceed to referendum.
- 2.7 On the 18th April 2023 the statutory Decision Statement, a report outlining the examiner’s modification, the reasons for them and Councils acceptance of them, confirming that the neighbourhood plan could proceed to referendum was published and the referendum date of 29th June was agreed with the town council.
- 2.8 The referendum version of the neighbourhood plan is attached as Appendix A. Further supporting evidence, the examiners report and associate notices can be found for reference at [Home | Holt Neighbourhood Plan \(north-norfolk.gov.uk\)](http://Home | Holt Neighbourhood Plan (north-norfolk.gov.uk))

3. Proposals and Options

- 3.1 All Neighbourhood Development Plans are required to gain a majority of those voting in favour (i.e. 50% plus on the day) at a local referendum in order to proceed and be considered for adoption by the Local Planning Authority. If the Plan receives a positive result, then under Paragraph 38A(4)(a)&(b) of the Planning and Compulsory Purchase Act 2004 (as amended) the Council has a legal duty to bring the plan into force as soon as reasonably practicable. The date prescribed for such purposes¹ is the last day of an eight-week period following the day after the referendum was held unless the Council considers that doing so would breach European Union Obligations.
- 3.2 The specified question asked at referendum is “*Do you want North Norfolk District Council to use the Neighbourhood Plan for Holt to help it decide planning applications in the Neighbourhood Area*”

¹ Section 18A(1) The Neighbourhood Planning (General) Regulations 2012 (as amended 2016)

- 3.3 **On the 29th June 2023 a positive outcome was reached by the local community.** With 20.9% of the electorate voting, 552 votes supported the neighbourhood plan while 131 voted against. 80.8% of those that voted on the day were in favour of its use in the determination of relevant planning applications.
- 3.4 In order to comply with regulations, once the Plan is “made” i.e brought into force) by the District Council a Decision Statement must be published on the District Council’s website. This Decision Statement must also be made available using other available means to demonstrate that the District Council has resolved to make the Neighbourhood Plan. The Council must formally “make” the relevant town/parish council aware of its decision and bring it to the attention of any other person or organisation who asked to be informed about the decision.
- 3.5 On adoption there is also the requirement to update the adopted policies map which accompanies the Development Plan. This policies map illustrates geographically the application of the policies in the adopted Development Plan for the District. The update and adoption of the policies map is to ensure compliance with paragraph 9 of the Local Planning Regulations 2012.
- 3.6 The Council must also publish a copy of the made Neighbourhood Plan and make it available on the website and through other media.
- 3.7 The Council maintains the option not to make the Neighbourhood Plan under 38A(6) of the Planning and Compulsory Purchase Act 2004 (as amended), if it believes that the plan would be incompatible with any European Union obligations or Human Rights conventions.
- 3.8 The Holt Neighbourhood Development Plan is considered to meet the basic conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and be compatible with EU obligations as incorporated into UK law and the Convention rights and complies with relevant provision made by or under Section 38A and B of the Planning and Compulsory Purchase Act 2004 (as amended).

4. Corporate Priorities

The Holt Neighborhood Plan developed key aims according to local need as detailed below. Such aims align with the corporate objective of **improving the quality of life** of the District’s communities:

- *Promoting sustainable development, particularly appropriate housing for the community.*
- *Seeking high quality design and standards of amenity, whilst conserving heritage assets.*
- *Promote mixed use development.*
- *Consider patterns of growth to make the fullest possible use of public transport, walking and cycling, and to focus significant development in locations which are, or can be made, suitable.*
- *Protecting green space to serve the local community*

5. Financial and Resource Implications

- 5.1 The Council’s support for neighborhood planning is contained in existing the Local Plan Budget supplemented by MHCLG grant. There are no further financial implications within this report. The local planning authority is responsible for financing the independent examination and referendum for each neighbourhood plan. Should the HNP not be “made” there is likely to be further financial and resource implications across both planning policy and development management.

6. Legal Implications

- 6.1 A failure to “make” the Neighbourhood Plan and within the decreed time limit would mean that the council would be in breach of their legal duty.
- 6.2 Section 38A(1) of the Planning and Compulsory Purchase Act 2004 (as amended) (as enabled by Part 6, Chapter 3, Section 116 of the Localism Act 2011) grants local communities the right to set policies through a neighbourhood plan as part of the planning system for determining planning applications. It is not a legal requirement but a right which communities can choose to use. On adoption it forms part of the statutory development plan and sits alongside the Local Plan.
- 6.3 Under section 38A (4) of the Planning and Compulsory Purchase Act 2004 (as amended), local planning authorities have a legal duty to make a neighbourhood development plan following a positive referendum result. Under section 38A (6) of the Planning and Compulsory Purchase Act 2004 (as amended), the only exception to this is if the Council considers that it would be incompatible with any European Union obligations or Human Rights conventions.
- 6.4 The policies map illustrates geographically the application of the policies in the adopted development plan. The adoption of the policies map is to ensure compliance with Regulation 9 Town and Country (Local Planning) (England) Regulations 2012.
- 6.5 In accordance with the provisions of Regulation 19 of the Neighbourhood Planning (General) Regulations 2012, once the neighbourhood plan is formally made by the Council’s ‘Decision Statement’, setting out the decision to make the Plan and their reasons for it, it is required to be published on the Council’s website, and elsewhere if it’s considered necessary, to publicise such decision to those who live and work in the neighbourhood area.

7. Risks

- 7.1 A failure to “make” the Neighbourhood Plan and within the decreed time limit would mean that the Council would be in breach of their legal duty

8. Net ZeroTarget

No assessment has been made against the council’s [Net Zero 2030 Strategy & Climate Action Plan](#).

9. Equality, Diversity & Inclusion

- 9.1 Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 9.2 There are no direct implications on equality within this report. The neighbourhood development plan has been subject to a requirement within the 'basic conditions' not to breach any EU obligations or any Human Right obligations. This was tested at the independent examination.

10. Community Safety issues

N/A

11. Conclusion and Recommendations

- 11.1 The Holt Neighbourhood Plan has been prepared in accordance with the relevant legislative requirements, including public consultation, independent examination and local referendum. More than 50% of those voting in the referendum voted in favour of the plan and therefore the Council is formally required to make the plan.

- 11.2 Subject to cabinet approval it is recommended that the HNP be made by resolution to come into effect on 25th August 2023. Once made, the neighbourhood plan will become part of the statutory development plan. It will thereafter be an important consideration in the determination of planning applications for development in the parish of Holt.

3. Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that having been subject to successful local referendum;

- a. **the Holt Neighbourhood Plan be made (brought into force) as part of the statutory Development Plan for North Norfolk in accordance with section 38A(4) of the Planning and Compulsory Purchase Act 2004 (as amended) on the 25th August 2023;**
- b. **The issuing of the Decision Statement required under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in order to bring to the**

attention of the qualifying body, the people who live, work and or carry out business in the Neighbourhood Plan Area is delegated to the Assistant Director of Planning in conjunction with the Planning Policy Team Leader;

- 2. Acknowledge that the required consequential amendments to the adopted policies map and the required minor consequential changes to the referendum version of the neighbourhood plan through delegated powers to the Planning Policy Team Leader.**

Appendix A: Holt Neighbourhood Plan (Referendum Version) [Holt Neighbourhood Plan \(Referendum Version\) April 2023 \(north-norfolk.gov.uk\)](https://www.norfolk.gov.uk/consultations/2023/04/holt-neighbourhood-plan-referendum-version)

End

HOLT NEIGHBOURHOOD PLAN

2016 - 2036



POST EXAMINATION DRAFT PLAN REFERENDUM VERSION

APRIL 2023



A guide to reading this Plan

The purpose of this page is to explain the structure and to help you find your way around the Plan.

1) Introduction & Background

This section explains the background to this Neighbourhood Plan.

2) The Neighbourhood Area

This section details many of the features of the designated area.

3) Planning Policy Context

This section relates this Plan to the National Planning Policy Framework and the planning policies of the local planning authority, North Norfolk District Council.

4) Community Views on Planning Issues

This section explains the community involvement that took place in producing this Plan.

5) Aims, Objectives & Land Use Policies

This key section provides a statement on the Town Council's aims, and objectives for the Neighbourhood Plan. It then details Policies which are proposed to address the issues outlined in the Foreword and in Section 4.

6) Implementation

This section explains how the Plan will be implemented and future development guided and managed. It suggests priorities for how financial contributions from future development in the town should support local infrastructure improvements. Finally, it deals with a number of issues which although relevant are outside the scope of a Neighbourhood Plan.

7) Community Aspirations

This section details the Town Council's aspirations and community initiatives which are related to planning matters but which cannot be directly controlled by planning legislation.

HOLT NEIGHBOURHOOD PLAN 2016 - 2036

REFERENDUM VERSION APRIL 2023

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FOREWORD

Welcome to the HOLT NEIGHBOURHOOD PLAN

Through the aspirations and needs of the local community of Holt, as identified to us at various consultations and meetings throughout our time spent developing the plan, we have identified matters which will help to determine how our town grows over the coming years.

- *Our Plan will have a positive impact on many aspects of possible improvements and future development.*
- *Our Plan will be addressing topics such as “character” to enable us to guide planning to suit the needs of our own residents and necessary infrastructure.*
- *Our Plan will be a document which gives legal weight and good reasoning to our choices.*

A strong priority was to liaise with our community, relevant authorities and organizations and to observe the relevant policies. In developing the plan, we have had to work in stages, through a number of processes and specific steps.

Our aim was to produce a Neighbourhood Plan specifically for Holt and its community, which is in line with the strategic policies of North Norfolk’s adopted and forthcoming plans. We publicised our intentions to all people living in Holt and consulted according to the official guidance for Neighbourhood Planning.

We developed key aims according to local need:

- *Promoting sustainable development, particularly appropriate housing for the community.*
- *Seeking high quality design and standards of amenity, whilst conserving heritage assets.*
- *Promote mixed use development.*
- *Consider patterns of growth to make the fullest possible use of public transport, walking and cycling, and to focus significant development in locations which are, or can be made, suitable.*
- *Protecting green space to serve the local community*

Once our Plan is adopted, following a favourable local referendum, it will form part of the ‘development plan’ alongside the North Norfolk Local Plan. Together they are the starting point for deciding how future development should take place in Holt, including type and quality of that development to ensure that it meets local objectives and needs.

I would like to sincerely thank everyone who has contributed directly to the development and completion of Holt Neighbourhood Plan and all members of our community for their willing engagement and input that has shaped and determined the objectives for the future of Holt.

Maggie Prior

Chair, Holt Neighbourhood Plan

Neighbourhood Plan Finishing Group

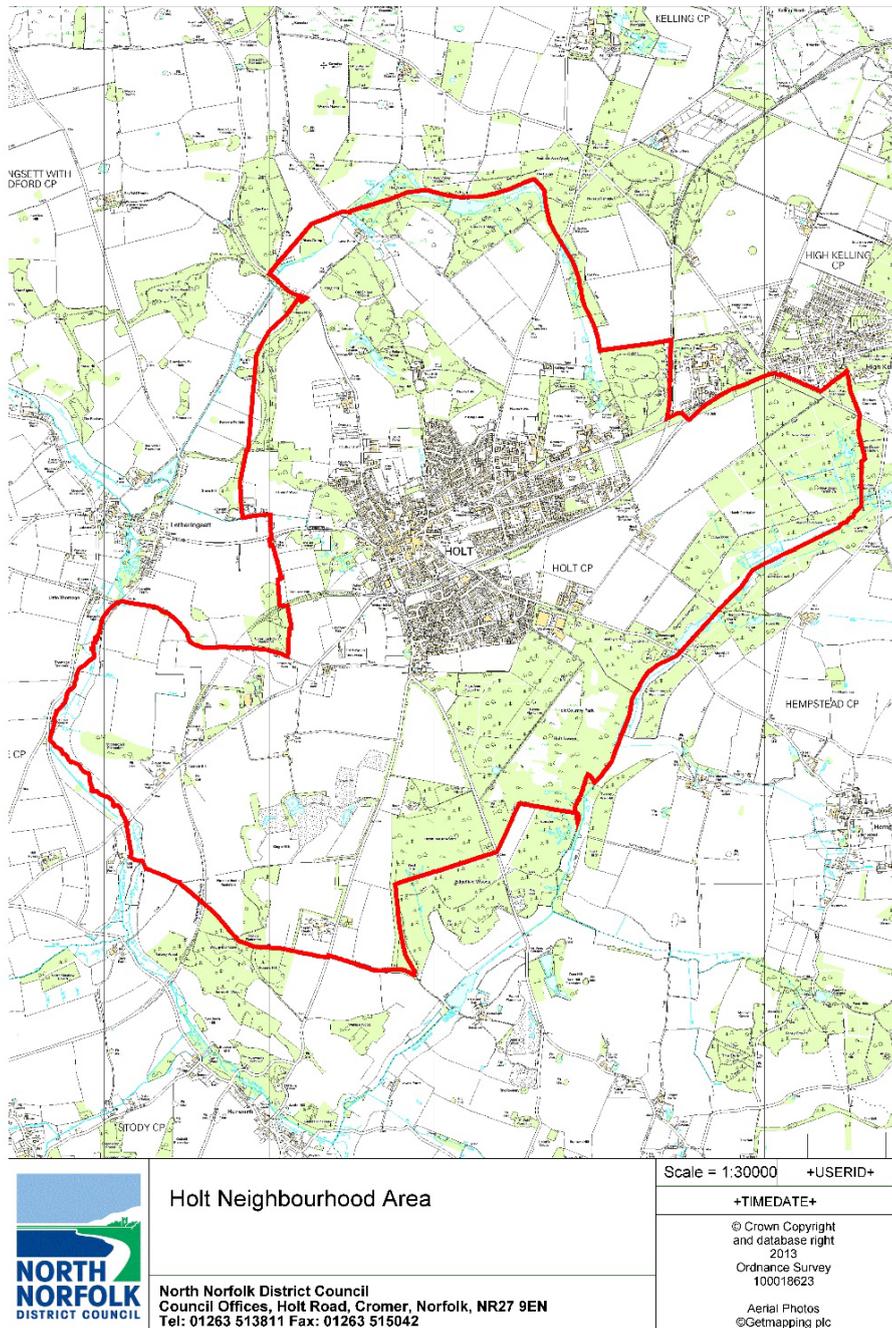
Cllr Maggie Prior (Chair), Cllr Bryan Payne, Cllr Ray Moore and Gemma Harrison (Town Clerk)

LIST OF POLICIES

POLICY NO.	POLICY TITLE	PAGE NO.
HOLT1	Design Guidance	18
HOLT2	Housing Type & Standards	21
HOLT3	Green Infrastructure	24
HOLT4	Employment Growth in Holt	27
HOLT5	Community Facilities	30
HOLT6	Connectivity In and Around Holt	32
HOLT7	Open Spaces	34

1. INTRODUCTION & BACKGROUND

- 1.1 Holt Town Council has prepared this Neighbourhood Plan for the area designated by the local planning authority, North Norfolk District Council (NNDC), in December 2013. The plan has been prepared in accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended). The designated area coincides with the Town Council's administrative boundary (see Plan A below) and is centered on the town.
- 1.2 The purpose of the Holt Neighbourhood Plan is to set out a series of planning policies that will be used to determine planning applications in the area in the period to 2036. The Plan will form part of the development plan for North Norfolk (insofar as the parish of Holt), alongside the adopted North Norfolk Core Strategy & Development Control Policies (2008), Site Allocations Plan (2011), and the forthcoming North Norfolk Local Plan which will replace the 2008 & 2011 policies and roll forward the plan period from 2021 to 2036.



Plan A: Designated Neighbourhood Area for Holt (Source: North Norfolk District Council)

- 1.3 Neighbourhood Plans provide local communities, like Holt, with the chance to manage the quality of development of their areas. Approved plans form part of the statutory development plan for North Norfolk and carry weight as a material consideration in how planning applications are decided in the Holt Neighbourhood Area. Plans must therefore contain only land use planning policies that can be used for this purpose. This often means that there are important issues of interest to the local community that cannot be addressed in a Neighbourhood Plan if they are not directly related to planning.
- 1.4 Although there was considerable scope for the local community to decide on its planning policies, Neighbourhood Plans must meet some ‘basic conditions’. In essence, the conditions are:
- Is the Plan consistent with national planning policy?
 - Is the Plan consistent with local planning policy?
 - Does the plan promote the principles of sustainable development?
 - Has the process of making the plan met the necessary requirements?
- 1.5 In addition, the Town Council needed to demonstrate to an independent examiner that it had successfully engaged with the local community in preparing the Plan.

Sustainability Appraisal & the Habitats Regulations

- 1.6 The District Council provided a ‘screening opinion’ on the need for the Neighbourhood Plan to have a Strategic Environmental Assessment (SEA) to identify its potential to lead to significant environmental effects (as per the Environmental Assessment of Plans & Programmes Regulations 2004 (as amended)). Following consultation with the statutory bodies (Natural England, the Environment Agency and Historic England) it concluded that there was no potential for such a scale of effects and therefore no SEA was considered to be necessary.
- 1.7 As part of the process the Town Council needed to demonstrate how the Neighbourhood Plan achieves sustainable development as one of the examination tests.
- 1.8 The District Council was also obliged to screen the Neighbourhood Plan to ascertain if its policies may have a significant effect on any internationally designated habitats sites within influencing distance of the Plan. It carried out that screening and consulted with the relevant statutory bodies. Both confirmed that the potential for such effects could be screened out and no Habitats Regulations Assessment of the Plan was necessary, as per the Conservation of Habitats and Species Regulations 2017 (as amended).
- 1.9 The Neighbourhood Plan was submitted to NNDC for independent examination on 12th September, 2022. Following successful examination the Neighbourhood Plan has been modified in accordance with the findings of the independent examiner and any necessary consequential changes, and is now subject to a local referendum. If successful it will be put forward to NNDC to adopt as part of the development plan for the parished area of Holt, where it will become, along with the Local Plan, a material consideration in informing and determining planning applications.

Future Changes to the Planning System

- 1.10 In May 2022 the Government published its Levelling Up & Regeneration Bill, which contains proposals to change both the development plan and management system. Neighbourhood plans remain a strong part of that system, but, like Local Plans, would have to avoid repeating or conflicting with national development management policies.

There are also changes to the ‘basic conditions’ proposed in respect of judging general conformity with the development plan.

- 1.11 It is not known how long the Bill will take to enact, nor the extent to which its first proposals will survive Parliamentary scrutiny. Should the Act and other Regulations come into force soon after the Neighbourhood Plan is made, then the Town Council may review the Plan to consider the extent to which new legislation might necessitate future modifications to the Plan in order that it remains effective.

Pre-Submission Stage Consultation

- 1.12 A draft (‘Pre-Submission’) Neighbourhood Plan was published for a six-week period of consultation between 11 January and 23 February, 2018 in line with Regulation 14 of the Neighbourhood Planning General Regulations 2012 (as amended). This followed extensive engagement with the community and other stakeholders in the previous five years. A number of responses to the consultation were received and details of these along with the changes made to the Plan as a result are set out in the Consultation Statement. The feedback demonstrated healthy support for the aims and objectives although further work was necessary to translate them into effective planning policies which would dovetail with those of the adopted and emerging Local Plan.

Submission Stage & Consultation

- 1.13 This version of the Plan represented Holt Town Council’s final proposed Neighbourhood Plan document. It was submitted to North Norfolk District Council on 12 September 2022 in line with Regulation 15 of the Neighbourhood Planning General Regulations 2012 (as amended), along with a number of other prescribed documents:

- **Basic Conditions Statement**

The purpose of this document was to set out how the Neighbourhood Plan met the Basic Conditions test which was applied by the appointed examiner who inspected the Submission Version Plan. This considers whether the Plan is in general conformity with local and national planning policy, and does not breach EU law (either currently adopted or as transposed into UK law), and other basic conditions.

- **Consultation Statement**

The purpose of this document is to set out how Holt Town Council & Neighbourhood Plan Steering Group has engaged with the community in preparing the Plan. The focus of the ‘Consultation Statement’ is on the 6-week Regulation 14 Pre-submission stage consultation. The Consultation Statement shares the feedback received during the Neighbourhood planning process, the comments made through the consultations and, where necessary and appropriate, how the comments received have been considered in developing the Plan.

- **Other evidence base documents**

- 1.14 NNDC published the Submission Version Neighbourhood Plan for a 6-week period of public consultation in accordance with Regulation 16 of the Neighbourhood Planning General Regulations 2012 (as amended). The consultation took place between Monday 10 October and Monday 21 November, 2022.

Independent Examination

- 1.15 An independent examiner, Mr Robert Bryan, was appointed by NNDC to carry out an examination of the submitted draft Neighbourhood Plan. The examination commenced on Monday 9 January and concluded with the submission of the examiners final report, submitted Tuesday 28 February, 2023. The examination was conducted by a process of written representations and did not involve a public hearing.
- 1.16 The Submission Version Plan and accompanying statements, evidence base and representations received during the Regulation 16 consultation were forwarded to the examiner and published on the NNDC web site. The full list of information and evidence considered by the examiner is detailed in the examiner's report.
- 1.17 Further information can be seen at www.north-norfolk.gov.uk/holtnp

Examiners Report

- 1.18 The examiner issued his independent report to NNDC on Tuesday 28 February, 2023. The report recommended that the Holt Neighbourhood Development Plan for the period up to 2036 should, subject to the specified modifications (those contained in the report), proceed to referendum. Consequently, this version of the Neighbourhood Plan has been updated to incorporate the examiners modifications, and any necessary consequential changes.

Decision

- 1.19 It is the responsibility of NNDC as the Local Planning Authority to determine if the Plan meets the Basic Conditions tests, with or without modifications, and whether it should proceed to referendum. Under the regulations (Town & Country Planning Act section 4b and Neighbourhood Planning Regulations, 2012) (as amended), officers have considered the recommendations made in the examination report, and the reasons for them, and are satisfied that the Plan, incorporating the proposed modifications in full, can proceed to referendum. A Decision Statement to this effect was issued on Tuesday 18th April, 2023, as required by the regulations.
- 1.20 The Holt Neighbourhood Plan cannot be formally 'made' (adopted) until after a positive referendum result. However, government guidance stipulates that emerging Neighbourhood Plans, and in particular 'post-examination' plans, should be given weight in decision making where that Plan is a material consideration to the application:
- *An emerging neighbourhood plan is likely to be a material consideration in many cases. Paragraph 48 of the revised National Planning Policy Framework sets out that weight may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. A referendum ensures that the community has the final say on whether the neighbourhood plan comes into force as part of the development plan. Where the local planning authority publishes notice of a referendum, the emerging neighbourhood plan should be given more weight, while also taking account of the extent of unresolved objections to the plan and its degree of consistency with NPPF.*
 - *Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a*

local planning authority must have regard to a post-examination draft neighbourhood development plan, so far as material to the application.

- 1.21 Consequently, the issuing of the Decision Statement on Tuesday 18th April, 2023, brought into force the Holt Neighbourhood Plan as a material consideration in the planning application process and where proportionate weight should be applied in decision making.

The Referendum

- 1.22 A public referendum will be held on Thursday 29th June, 2023. Further details of the referendum will be published in a Referendum Information Statement and made available at www.north-norfolk.gov.uk/holtnp. People who reside in the Holt Neighbourhood Area and are registered to vote on the electoral register will be entitled to vote at the referendum.

- 1.23 At the referendum a specific question will be asked of the local community:

Do you want North Norfolk District Council to use the Neighbourhood Plan for Holt Neighbourhood Area to help it decide planning applications in the neighbourhood area?

- 1.24 If more than 50% of those voting vote yes, then this Neighbourhood Plan will become part of the overall development plan, along with the NNDC Local Plan and National Planning Policy, and shall be a material consideration in the determination of future planning applications.

2. THE NEIGHBOURHOOD AREA

- 2.1 Holt is a market town located in north Norfolk, some 3 miles (5 km) from the north Norfolk coast. The town is 23 miles (36.5 km) north of the city of Norwich, 9.5 miles (15 km) west of Cromer and 35 miles (56 km) east of King's Lynn. The town is on the route of the A148 King's Lynn to Cromer Road. The nearest network railway station is in the town of Sheringham where access to the national rail network can be made via the Bittern Line to Norwich. The nearest airport is Norwich.
- 2.2 The name 'Holt' is thought to derive from the Anglo-Saxon word for woodland. Holt is located on wooded high ground of the Cromer-Holt ridge at the crossing point of two ancient by-ways, and as such was a natural point for a settlement to grow. Holt has a mention in the Domesday Book and is described as a market town and port (with the nearby port of Cley-next-the-Sea being described as Holt's port). Over the years Holt has grown as a local place of trade and commerce, although the weekly market, which has taken place since before the 1080's, ceased during the 1960's.
- 2.3 On 1st May 1708 the town of Holt was devastated by a fire which destroyed most of the medieval town, the fire started at Market Place and quickly spread through the timber houses of the town. With most of the medieval buildings destroyed in the fire the townsfolk set about rebuilding the town. The rebuilding made Holt notable for its abundance of Georgian buildings, that being the style at the time the town centre was rebuilt.
- 2.4 The Parish Church of Saint Andrew the Apostle was established in Holt before 1086, the year of the Domesday Book. The church is situated in the heart of the town at the end of Church Street, which is found behind the War Memorial, at the east end of what was the original market place.
- 2.5 Holt retains a 'small market town' character with development contained within a limited area, which has so far avoided urban sprawl into the wider countryside. The population of Holt is 3,808 with 1,807 households [Source: 2011 Census].
- 2.6 The town has seen considerable expansion around its southern boundary over the last few years, with more committed housing and employment schemes to follow in that area in the coming years. The new homes have enabled the town to remain busy, although there are concerns that its local social and traffic (notably town centre parking) infrastructure will be enough to cope with the larger local population. These concerns are being addressed via a separate project "Holt Vision 22" which tackles congestion and parking in the town, as well as looking into increased public realm space. A separate report on Holt Vision 22 is available by request from the Town Council.
- 2.7 In June 2021 an appeal was approved by the Secretary of State for a scheme to build 110 homes on Beresford Road, also on the southern edge of the town. The proposal includes provision for infrastructure to service land to deliver a new primary school to serve the town and a new public open space. It is anticipated that the County Council as local education authority will bring forward proposals to deliver the new school shortly. The new school may act as a new hub for community activity in that part of the town.

3. PLANNING POLICY CONTEXT

3.1 The town of Holt lies within the North Norfolk planning authority area in the county of Norfolk in eastern England.

National Planning Policy

3.2 The National Planning Policy Framework (NPPF) published by the government in 2021 is an important guide in the preparation of neighbourhood plans and accompanying the NPPF is an online resource known as the Planning Practice Guidance, (PPG), this adds further to the NPPF and assists in its interpretation. A specific section exists for neighbourhood planning;

[Planning practice guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

The following paragraphs of the NPPF are considered especially relevant to this Neighbourhood Plan:

- Achieving sustainable development (p8)
- Non-strategic policy making by Neighbourhood Plans (p18 and p29)
- Meet local housing needs (p62)
- Local economic and rural development (p82 and p84)
- Ensuring the vitality of town centres (p86)
- Providing community infrastructure (p93)
- Protecting public open space (p99)
- Promoting sustainable travel (p105)
- Achieving high standards of design (p127)
- Conserving and enhancing the natural environment (p174, p176 and p179)
- Conserving and enhancing the historic environment (p190)

3.3 The Government published its first National Design Guide in autumn 2019 to encourage better design outcomes from the planning system. The Guide encourages local communities to engage in understanding the character of their areas and, where preparing neighbourhood plans, to prepare design policies specific to their local areas.

Strategic Planning Policy

3.4 The Neighbourhood Plan must be in general conformity with the strategic policies of the development plan, which primarily comprises the North Norfolk Core Strategy incorporating Development Control Policies (2008), and the Site Allocations (2011) Development Plan Documents.

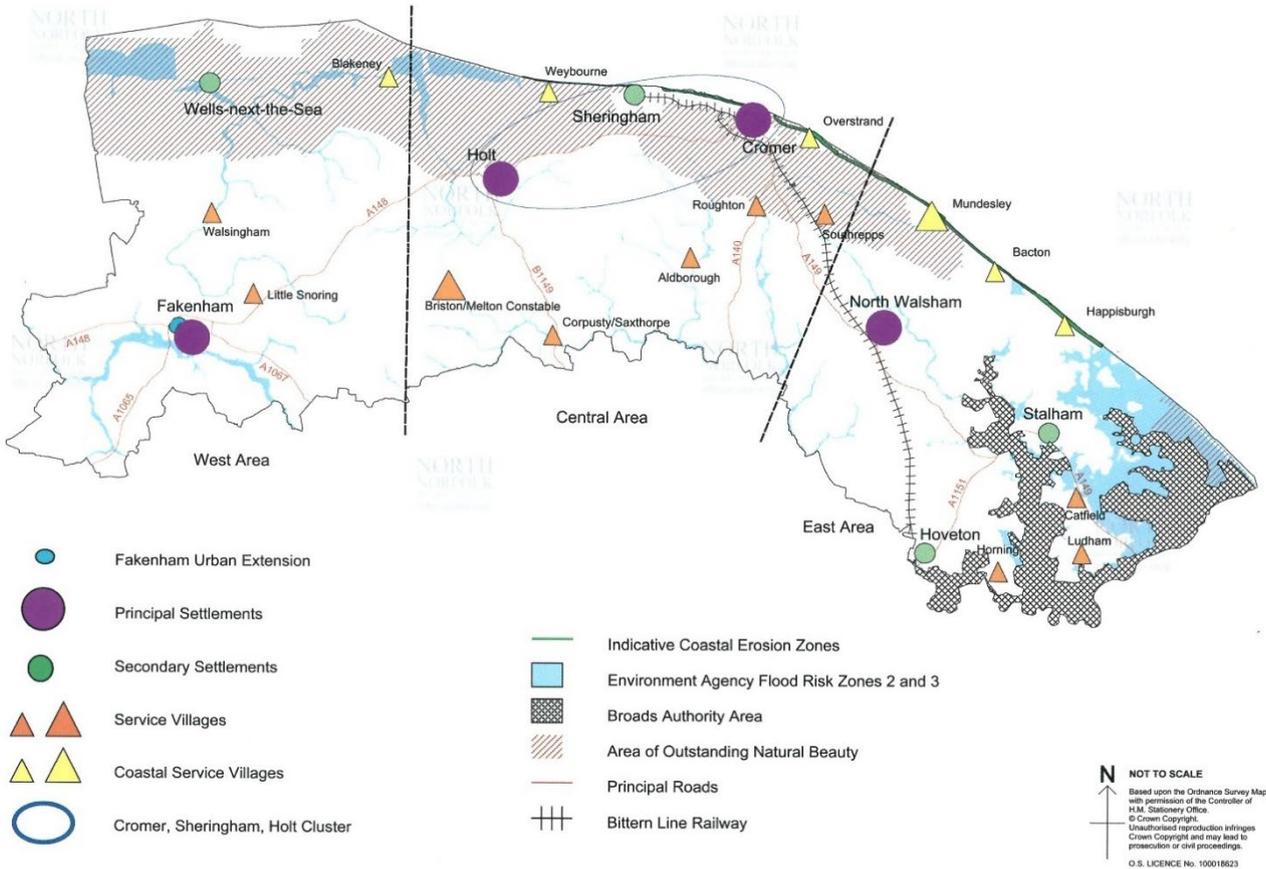
The Adopted Development Plan

3.5 The Core Strategy envisages that:

“Holt will thrive as a visitor destination based on its reputation as a ‘niche’ retail centre. The town’s strategic location will be attractive to employers wishing to establish or expand on new serviced employment sites, meeting the employment needs of a wide catchment, including the towns of Cromer and Sheringham and a large part of the AONB. Additional housing will have been provided to help meet the needs of local people without compromising the setting of the town within the Glaven Valley Conservation Area and AONB.”

- 3.6 Policy SS1 (the spatial strategy for the district) identifies Holt as one of four Principal Settlements with a Small Town Centre, as an employment area attracting people from the surrounding area to work in Holt (see Plan B). Policy SS3 planned for the delivery of 700 homes in the twenty-year period 2001 - 2021 and Policy SS5 provided for 15 Ha of new employment land in the town and defined its primary shopping area and retail frontages.
- 3.7 Its policy for the town – SS9 – also encourages proposals to improve the pedestrian environment of the town centre and its car parking and identified the groundwater catchment area of the Norfolk Valley Fens SAC as requiring special attention in development proposals.
- 3.8 The document also includes a wide range of development management policies, with its housing mix, Norfolk Coast AONB, landscape character, design, historic environment, biodiversity, retail development, tourism development and accommodation policies being of special interest and relevance to Holt.

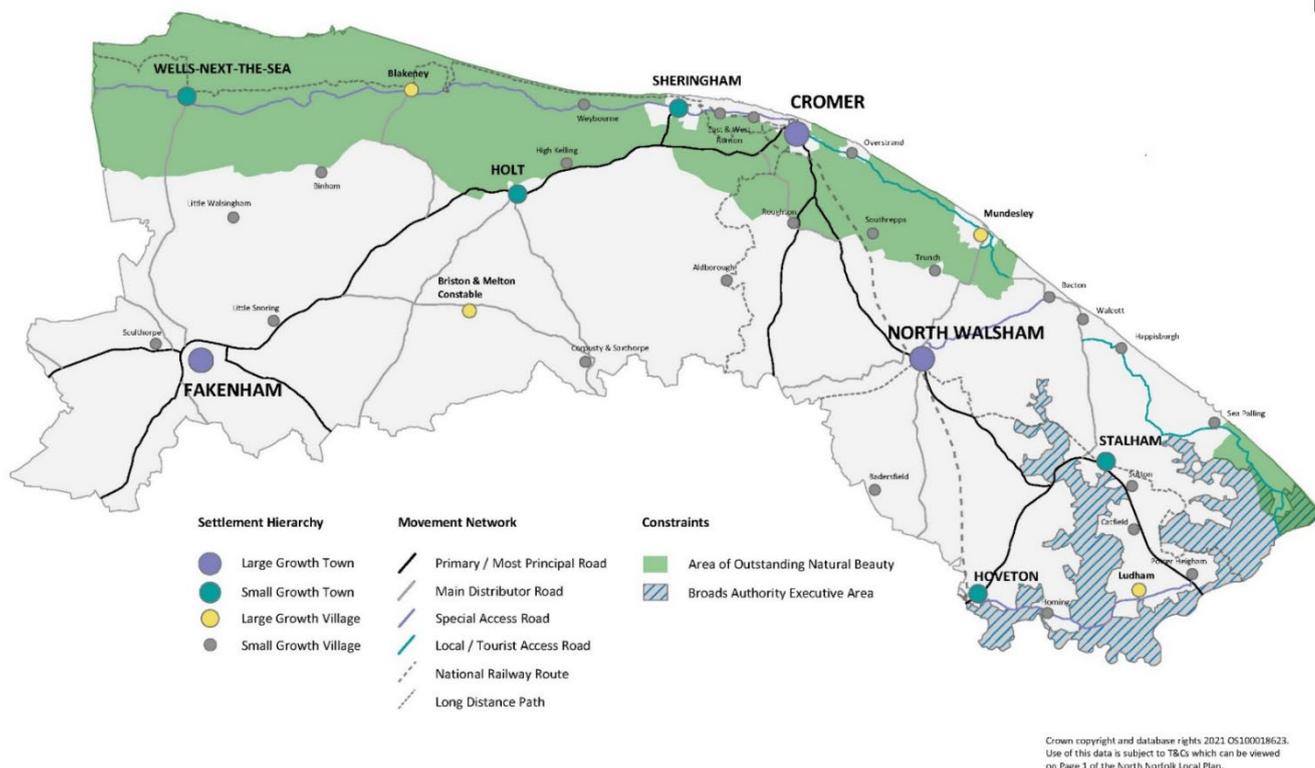
Figure 3 Key Diagram



Plan B: Adopted Core Strategy Key Diagram 2008 (Source: North Norfolk District Council)

- 3.9 The Site Allocations Plan allocated land west of Woodfield Road (Policy H01) for 100 homes, land at Heath Farm/Hempstead Road (H09) for 200 homes and at least 5 Ha of employment uses and land at Thornage Road (CP10) for a new public car park. The housing schemes have now been delivered; there has been no progress on the car park proposal.

Figure 3 - North Norfolk Key Diagram



Plan C: Emerging Proposed Local Plan Key Diagram 2022 (Source: North Norfolk District Council)

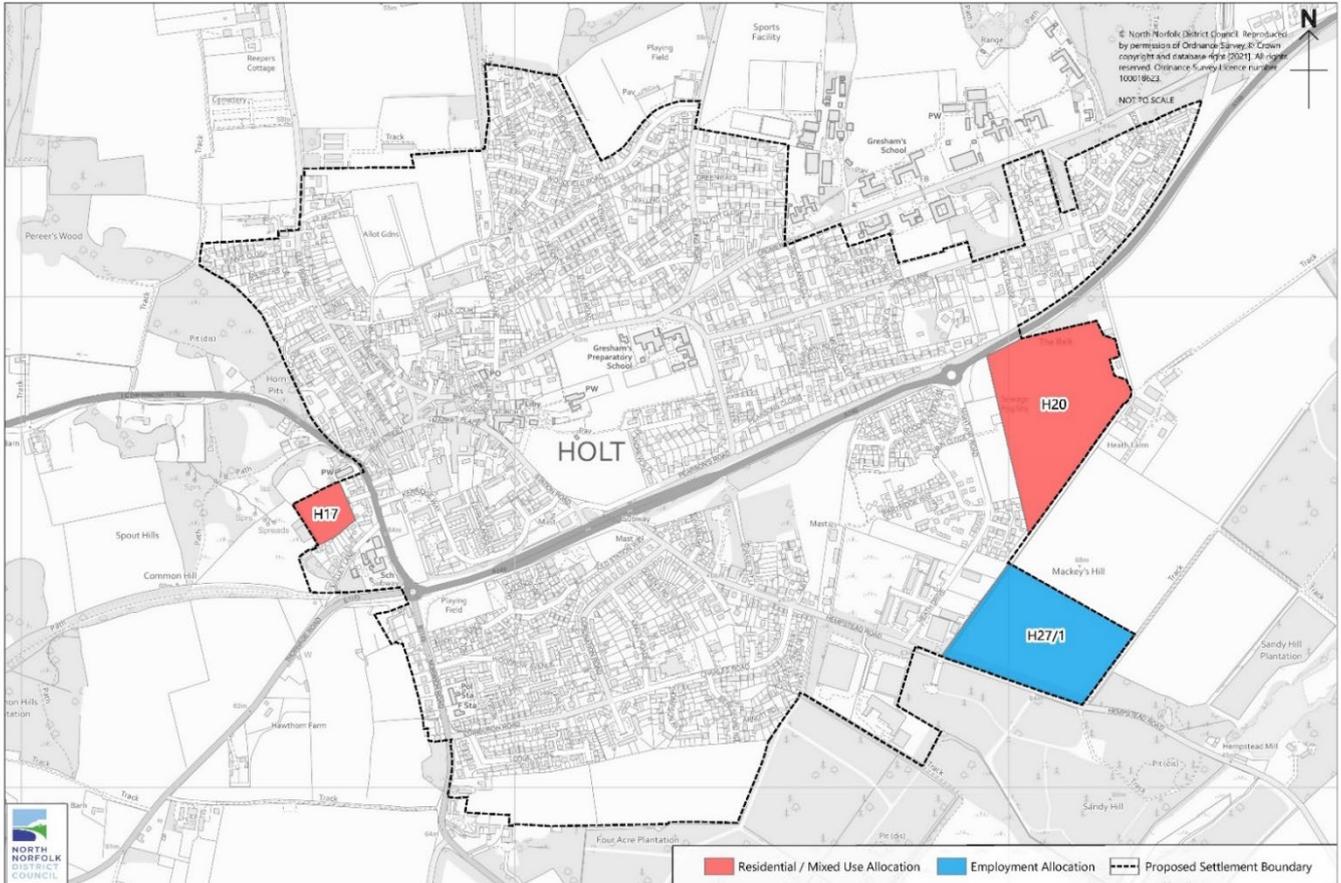
The Emerging North Norfolk Local Plan 2016 – 2036

3.10 The new Local Plan has made significant progress and, at the time of writing, is expected to be submitted for examination shortly, having completed its Regulation 19 consultation in March 2022. Its spatial strategy does not change the role of Holt in the District (see Plan C) and it continues to provide a comprehensive range of strategic and non-strategic spatial and development management policies covering all relevant issues for Holt, including three site allocations. They comprise land north of Valley Lane (H17) for 27 homes and further land at Heath Farm for another 180 homes and elderly person’s accommodation (H20). A6 Ha of employment land (H27/1), as shown on Plan D below, was also proposed for allocation in the Regulation 19 version draft Local Plan. These allocations need to be considered further at the public examination of the Local Plan.

3.11 The strategic policies of NNDC set out a housing requirement for Holt which is met in full through the site allocations of the emerging Local Plan and it is not the intention of this Neighbourhood Plan to identify additional local need or sites for further growth. The goal for the Neighbourhood Plan is thus a narrow context to refine and add value to current Local Plan policy. The Core Strategy establishes a settlement boundary which is significant as it establishes limits on development and is referred to in policies in this Plan. The settlement boundary, however, will be altered in the emerging Local Plan to encompass changes to the built form of the town and include allocated development sites. The settlement boundary shown in Plan D, is therefore only a proposal at this stage and is not a factor in determining planning applications.

3.12 There are three County-wide waste and minerals development plans that apply in this area, but they are not considered relevant in the preparation of this Neighbourhood Plan. There are no made neighbourhood plans in the immediate vicinity of Holt, but a small

number have been made elsewhere in the District, or are in progress.



*Plan D: Allocations in Holt - North Norfolk Local Plan, January 2022
(Source: North Norfolk District Council)*

4. COMMUNITY VIEWS ON PLANNING ISSUES

- 4.1 A Vision project produced the 'A Vision for Holt Document' that was published in February 2012 after six months of information gathering and consultation. The key purpose of the project was to produce a visioning study for the development of key community, economic and environmental improvements for Holt. A Vision for Holt was something which had been originally identified by the Holt Planning Group (a group formed by the Town Council and other partners in the town). The key outcome was to provide a more coordinated and pro-active forum through which specific projects can be identified, promoted, consulted upon, and, most importantly, delivered.
- 4.2 In October 2014 the Neighbourhood Plan Steering Group organised an all-day community event where residents and local businesses were asked about their views on Holt and how to make Holt a better place. A community survey was undertaken, this involved a questionnaire being distributed to every household and business in Holt. 228 completed forms were returned. The survey was analysed by an external company and the results were used to inform and develop the Mission Statement, Objectives and emerging policy statements of the Plan. The Steering Group took part in workshops led by consultations from Planning Aid on a number of specific topics including character assessment and developing a mission statement. Children from Holt Primary School shared their 'likes' and 'dislikes' on different types of buildings at a workshop.
- 4.3 Community events engaged the wider community to develop a better understanding of what local residents felt was important whilst gathering the evidence to support the HNP. To ensure the consultation process was as inclusive as possible the Steering Group wrote to key stakeholders, and published articles in the local magazine 'The Chronicle', delivered to every household and business in Holt. This was in addition to setting up a dedicated webpage on the Town Council's website to provide information and encourage feedback.
- 4.4 The outcomes of the community survey, the Mission Statement and Objectives were shared at the Community Consultation event in June 2017, with policy statements being discussed and tested in consultation with local residents. The Steering Group categorised the policies by five key themes and drafted the Neighbourhood Plan to align with the desired outcomes to achieve the Mission Statement and Objectives.
- 4.5 The pre-submission consultation of the draft HNP was consulted on in January - February 2018, following which, the HNP was updated to incorporate the comments received from local residents and stakeholders.



5. AIMS, OBJECTIVES & LAND USE POLICIES

Aims

5.1 The aims for the neighbourhood area are:

“As the gateway to the North Norfolk coast, Holt will be recognised as an historic market town, based in a rural setting, with a vibrant town centre. Harnessing its growth potential, whilst retaining a strong local identity and distinctiveness.”

Objectives

5.2 The key objectives of this Neighbourhood Plan are:

- To preserve the character of Holt, including the spatial balance between the rural, built and historic environment, character and ethos
- To support housing tailored to the needs and context of Holt
- To protect, enhance, strengthen and support economic and tourism activities, seeking the development, growth and regeneration of employment sites for employment uses appropriate to Holt.
- To develop and improve local community facilities, open green space, parking and services (such as recreation, education and medical) for all age groups.
- To support enhanced public transport infrastructure and sustainable transport options, including walking and cycling.

Land Use Policies

5.3 The following seven policies relate to the development and use of land in the designated Neighbourhood Area of Holt. They focus on a small number of specific planning matters that are of greatest interest to the local community, leaving other policy matters to the Local Plan to cover. This has avoided unnecessary repetition of policies between these plans, though they have a mutual, helpful inter-dependence.

5.4 Each policy is numbered and titled, and it is shown in bold italics. Where necessary, the area to which it will apply is shown on the Policies Map at the end of the document. After each policy is some supporting text that explains the purpose of the policy, how it will be applied and, where helpful, how it relates to other development plan policies.

Aspirational Policies

5.5 The Plan contains further aspirations which are not technically matters covered by planning legislation but which are relevant to the context of the Plan and supplement the overall strategy for the town. These relate to matters such as improved rail transport, which is referred to in the final chapter regarding Implementation.

Policy HOLT1 - Design Guidance

The design of development proposals should be in conformity with the North Norfolk Design Guide and relevant Conservation Area Appraisals, and should have regard to the following special interest and character of the Neighbourhood Area as relevant to the location, nature and scale of the proposals:

1) In the designated town centre area, including that part within the Holt & Glaven Valley Conservation Areas:

- The tight grain of buildings and spaces arranged around a medieval layout of roads and alleyways
- The generally narrow plots and mix of commercial, residential and community uses
- The mix of two and three-storey town house, commercial and other buildings
- The predominance of vernacular building, roofing and boundary materials
- The prominence in the street scene of major landmark buildings that punctuate or terminate key views along High Street and Market Place

2) Elsewhere within the designated Holt Settlement Boundary:

- The importance of a combination of long and revealed views into the Conservation Area from public vantage points on its outskirts
- The scale and grain of development in the vicinity of the site.

3) Elsewhere within the Neighbourhood Area:

- The definitive role played by the appearance and topography and key characteristics of the Glaven Valley Conservation Area in forming the open landscape character of the setting of the town to its south and west
- The large fields, rolling hills and woodlands forming the agricultural landscape that surrounds the town in framing its rural setting, most notably the Norfolk Coast Area of Outstanding Natural Beauty to its north
- The prominence on the edge of town of the distinctive Gresham's School set within large, formally laid out grounds.

4) In the whole Plan area:

- The presence of listed buildings or non-designated heritage assets.

5.6 This policy refines and supplements Local Plan policies to aid their application in Holt, not just within its Conservation Areas but also other parts of the town and its special landscape setting. It requires proposals within the Conservation Areas and its setting to have acknowledged, understood and responded to the Appraisal that has recently been updated by NNDC but draws out of it a small number of essential characteristics in its first clause.

5.7 The Glaven Valley Conservation Area is essentially rural in nature and broadly wraps around the west and southern parts of the town. Its boundary is shown on the plan in Appendix A.

5.8 Holt is a historic market town full of character (see Plan E). Most of the medieval town was destroyed in 1708 in the great fire of Holt, which broke out amongst the market stalls.

It swept through the wooden buildings of the town; the Norman parish church was repaired and the town centre was rebuilt, which now has an abundance of important Georgian and some early Victorian buildings. A noticeable survivor of the fire is the Listed Grade II Byfords building (1–3 Shirehall Plain) which is thought to be the oldest house in Holt (the cellar dates back to the 15th century). The premises traded as a hardware shop or ironmongers for over 100 years under the ownership of the Byford family. Byford's is now run as a café, delicatessen and bed & breakfast.

5.9 The centre of Holt was designated a Conservation Area in December 1974, covering the historic centre of Holt and includes primarily early-mid Victorian housing to the north and green spaces bordering the town on the east and west sides. Holt has a wealth of designated and non-designated heritage assets. In all, there are 118 listed buildings, two Grade II*; the Old Rectory and the Parish Church of St. Andrew the Apostle, with the remaining 116 Grade II listed.



Plan E: Holt Conservation Area and Heritage Assets August 2021
(Source: North Norfolk District Council)

5.10 The historic core of the town is rectangular in plan, bordered by Market Place, Bull Street, White Lion Street and Shire Hall Plain. The High Street extends away to the west from this, encouraging more linear development. The Conservation Area is enclosed on the northern, southern and western sides by 20th century development. North of the town is Holt Hall, Grade II Listed, built in the 1840s and extended in the 1860s. The Hall is located in an 86-acre (35 ha) estate made up of ancient woodlands, lawns, lakes and gardens. Until 2022 it was used as a Field Study Centre run by Norfolk County Council, but it has now

closed and its future is uncertain.

- 5.11 The pineapple-topped Obelisk at Holt is one of a pair of gateposts from Melton Constable Park, the other having been given to the town of Dereham in 1757. Each gatepost records distances, to various places from Holt and Dereham respectively, carved into the stone. At the start of World War II, to avoid assisting the enemy in the event of invasion, the townspeople of Dereham dumped their obelisk down a deep well, where it remains to this day. The people of Holt whitewashed their obelisk at the start of World War II and it remains in good condition and a cause of great interest.
- 5.12 Blind Sam is the name given locally to the Queen Victoria Jubilee Lantern located in Obelisk Plain. Dating from 1887, the year of Queen Victoria's Golden Jubilee, it stood until 1921 in the Market Place, where it served two functions; to provide light to the Market Place and provide drinking water from two fountains at the bottom. The light was powered by the town's gas supply, which at times was sporadic and unreliable, hence the nickname "Blind Sam". It was moved to Obelisk Plain in 1921 to make way for the war memorial.
- 5.13 National and local strategic policies offer protection to listed buildings from harmful development and must be closely observed. In addition, there are non-designated heritage assets in the Plan area which, whilst not necessarily of listed status, have importance in heritage terms. These are also often referred to as buildings on the 'Local List' and this list, as it relates to the Holt Conservation Area, is included in the Holt Conservation Area Appraisal. National planning guidance in the National Planning Policy Framework (NPPF) states in paragraphs 203 and 204 "in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset...Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.



Policy HOLT2 - Housing Type & Standards

- 1) All new homes must be designed and constructed in a way that enables them to be adapted to meet the changing needs of their occupants over their lifetime. Planning permission will be granted for new dwellings subject to all new dwellings meeting the Building Regulations M4(2) standard: Category 2 - Accessible and Adaptable Dwellings¹.

All residential development proposals should demonstrate that dementia-friendly design principles are incorporated in the design.

If it is considered there is a case to not comply with these requirements on practical or viability grounds developers must submit appropriate supporting evidence of sufficient detail including a viability appraisal, when necessary, to enable these exclusions to be considered.

- 2) Proposals for specialist residential accommodation for older people will be supported provided they are within the built form of the settlement or updated settlement boundary, whichever is applicable, and are suitably located in terms of their amenity and proximity to local services.

5.14 This policy addresses accessibility, adaptability and specialist new homes. Its first clause supplements the provisions of Policy HOU8 of the emerging Local Plan in respect of new housing schemes being accessible and adaptable to meet the changing needs of occupants over their lifetime, including a focus on dementia-friendly homes.

5.15 Nationally it is recognised that there is a rapidly ageing population. Locally the picture is more dramatic with the age structure of the population of Holt significantly older than comparatives for Norfolk as a whole, with 38% of the population aged 65 and over compared with 24% in Norfolk and only 19% for England. This has significant implications for planning and plan-making.

5.16 Baseline data collected for the evidence base indicates that by 2030 there is predicted to be an increase of over 86% - c26,937 people - across Norfolk suffering from dementia. Holt has been designated as a dementia friendly town, for any new development that comes to Holt this is an opportunity for those developments to lead the way by incorporating simple but effective principles into their designs to deliver dementia friendly communities.

¹ Or any subsequent national equivalent standard should the Building Regulations and or national policy be reviewed in the future.



- 5.17 The **'At a Glance: a Checklist for Developing Dementia Friendly Communities'** is a document that offers useful checks and guidance on designing dementia friendly communities. It summarises some of the key design points set out in the Housing LIN Viewpoint *Breaking New Ground: The Quest for Dementia Friendly Communities*, by Dr Lynne Mitchell at the University of Warwick (Viewpoint No.25, Housing LIN, 2012). Recognising how people and their lifestyles change over time, including the need for their homes to be able to adapt with them, it is felt that implementing this simple principle could have a significant impact on health and wellbeing of residents. The policy requires applicants for relevant proposals to be familiar with this document and to show how they have responded to its principles.
- 5.18 The second clause complements Policy HOU2 of the emerging Local Plan by encouraging the provision of new specialist accommodation for older households in its own right, not just as part of large housing development schemes. Local authorities across Norfolk are working hard to try to reduce pressure on the social care and hospital budgets through a range of measures, called 'early help', and key amongst them is a desire to help keep people at home for as long as possible before moving into residential care accommodation. There is also increasing demand for specialist retirement-type accommodation, sometimes called 'extra-care'. This accommodation includes an element of care that helps people to 'down-size' more easily to more appropriate and desired accommodation. With such an ageing population there is going to be need for more housing with care or sheltered accommodation to be provided in the future. Support will be given to residential care accommodation (Use Class C2), which is normally best placed where it is well related to local services, particularly a doctor's surgery, shops and public transport to enable staff, residents and visitors to have good access.
- 5.19 The provision of affordable housing to meet local needs is a requirement under national and Local Plan policies and this does not require repetition in this Plan. It is however, important for the overall context of housing needs in the Plan area that the Local Plan policies are explained here. In respect of meeting the town's housing needs, affordability of local houses is a significant issue. With the median salary for North Norfolk, £18,008 and the average house price in Holt at £401,137. This results in an average house price to income ratio of 1:22. Significantly higher than the ratio for Norfolk North and for England at 1:9 and 1:7 respectfully. [Source: Annual Survey of Hours and Earnings Office for National Statistics].
- 5.20 The amount of affordable housing secured on a market-housing site is determined by NNDC through the application of local plan policies and is secured through Section 106 agreements. There is a requirement within the Core Strategy to provide 45% (proposed to be revised to 35% in the emerging Local Plan) affordable houses within any new development. The Town Council encourages the NNDC's 'local lettings policy' to support individuals in housing need with a local connection to have priority in accessing some of these

dwellings.

5.21 As of June 2022 there were 1091 applicants on the housing list requiring housing in Holt of which 161 were on the Housing Register (high level of need and meet the reasonable preference criteria), 91 were on the Transfer Register* (specifically wish to transfer to the Holt area) and 839 were on the Housing Options Register** (lower levels of need and may not meet one or more of the reasonable preference criteria).

** This register contains those qualifying applicants who are an existing tenant of a housing association or registered provider and live in North Norfolk and do not qualify for the housing register as they do not have an urgent housing need.*

*** The housing Option Register is the register that contains those qualifying applicants who do not meet the qualification criteria for the Housing Register or Transfer Register*

5.22 The demographics of Holt support action to be taken to enable younger people to be able to remain within the community they have grown up in. When a property is allocated to a household under the NNDC's 'Local Lettings' policy the cascade is used so that someone on the housing list who has a local connection would be prioritised above someone who does not have a local connection for these homes even if their identified need is higher on the housing register list.

5.23 For affordable housing on allocated sites and sites within the development boundary the North Norfolk District Council's policy is to give priority to those in greatest housing need from applicants on the Council's housing list. The District Council does not have the right to 'nominate' to shared ownership properties, but Housing Associations will advertise on the Council's Your Choice Your Home website alongside their other marketing activity. For affordable housing on exceptions sites, (these are sites outside of the development boundary), the Council's local allocation criteria applies, including to shared ownership. Applicants with a local connection to Holt and the adjoining parishes will get priority. In addition, Holt and Neighbourhood Housing Society, a local community-led housing group, has its own local allocation policy for the properties it owns and lets.

5.24 The settlement boundary, shown in the Core Strategy, at the time of the preparation of this Plan is outdated and does not equate fully to the built form of the settlement. This should be remedied by the emerging Local Plan but is recognised in this policy.

Policy HOLT3 - Green Infrastructure

The Neighbourhood Plan identifies a Green Infrastructure Network comprising a wide range of existing assets: open spaces, woodlands, water bodies, sustainable drainage land, amenity land, allotments, significant and clusters of mature trees, hedgerows.

- 1) Development proposals that lie within or adjoin the Network will not harm the habitat connectivity present in that part of the Network.
- 2) Proposals within or adjoining the Network shall identify and pursue opportunities for securing measurable net gains for biodiversity, including habitat connectivity, proportionate to their scale and impact.

5.25 This policy embellishes green infrastructure policies contained in the national advice, the Core Strategy² and potentially emerging policies into a mapped network within the town and throughout the rest of the Parish, as illustrated on Plan F.



5.26 Holt is sited three miles (five kilometers) from the North Norfolk coast. It is at the western end of the Cromer Ridge, a glacial moraine of sandy soil running parallel to the sea, a region that is recognised today as an Area of Outstanding Natural Beauty (AONB). The AONB stretches into the northern part of the Plan area. The NPPF stresses in paragraph 176 that *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife add cultural heritage are also important consideration in these areas'*. It is particularly important that the merits of the parts of the green infrastructure designated for their ecological importance, such as the Norfolk Fens (Holt Lowes SSSI) shown on Plan F in Appendix 1, are specifically recognised as part of any assessment of impacts on the green infrastructure and its ecology.

5.27 In the North Norfolk Landscape Character Assessment (LCA) 2021 Supplementary Planning Document) Holt lies within the Wooded Glacial Ridge Landscape Type, and the town is noted both as a key characteristic and as a valued feature of this type. The LCA and its highlight of special landscape qualities can be a material consideration in the determination of proposals.

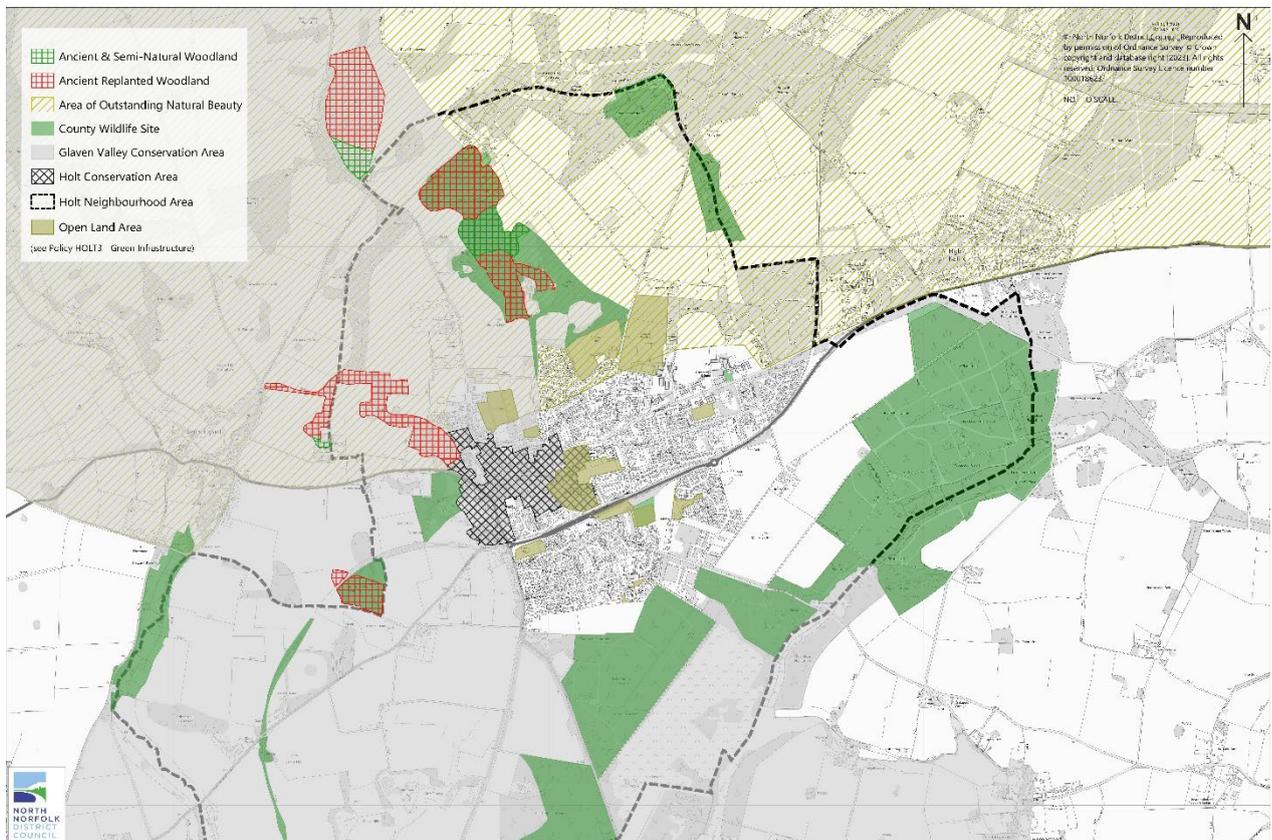
5.28 There is a good deal of woodland around Holt, particularly on the south side. This includes areas of older woodland and more recent plantations of pine trees, which make use of

² Core Strategy policy EN9 Biodiversity and Geology

areas of poor acidic soil. The plantations on the east side are broken up by Gresham's School and Kelling Hospital; both of which have large grounds.



5.29 The south side of Holt is separated from the town centre by the A148 road, which separates Holt from the woods to the south and an important local amenity, Holt Country Park. Holt Country Park is a short walk from the town. It has had a chequered history, including a horseracing course, heath, farmland, forestry and woodland garden. It has now been established as tranquil woodland dominated with Scots pine and native broadleaves. Its rich ground flora supports an abundant display of wildlife including deer. The Park has achieved a Green Flag Award every year since 2005 and is very popular with school and families where they join in environmental and arts events throughout the year, with 'way-marked' routes suitable for walkers, wheelchairs and pushchair users. There are also orienteering posts in the park for groups to use. The Park is free to the public with a small charge for parking.



Plan F: Holt Green Infrastructure Map, April 2023 (Source: NNDC)
 (a larger scale version can be viewed at Appendix A)

- 5.30 The Holt Lowes is an area of heathland to the south of Holt that is open to the public and has long been recognised as an area for wildlife. It was designated as a Site of Special Scientific Interest (SSSI) in 1954 and for a while managed as a nature reserve by Norfolk Wildlife Trust, which continues to act as managing agents for the trustees. It is also designated as a Special Area of Conservation (SAC), a component unit of the Norfolk Valley Fens SAC and is therefore of international importance for its biodiversity value. Spout Hills is a large area of open green space, which historically provided the town of Holt with all its water needs, enabling it to grow and flourish. An old reservoir still exists but the pumping station was dismantled in the 1950's. Work has been undertaken in more recent years to restore and conserve the hills for future generations by removing scrub, keeping the pastures clear and maintaining the woodlands which have grown up.
- 5.31 In the Parish there are a number of areas of Registered Common Land with Open Access under the CRoW Act, several areas of registered Ancient Woodland on the Natural England Ancient Woodland database, and a significant number of trees identified as 'veteran trees' in recognition of their age and their landscape and biodiversity value.
- 5.32 County Wildlife Sites (CWS) designation is non-statutory but is recognition of a site's high value for wildlife, with many sites being of county and often regional or national importance. They often support characteristic or threatened species and habitats that are local and national priorities for conservation. The Parish of Holt has a large number of County Wildlife Sites (CWS), more than most Norfolk Parishes, including Cat's Pit Wood, the Disused Railway, Glaven Farm Meadow, Edgefield Heath, Spout Hills, Old Pollard Wood and Fairfield Lawn. Spout Hills is especially important as a large area of trees, bushes, grassland, a pond and streams, which is close to the town centre. Formerly known as 'The Pleasure Grounds' from Victorian times, the area is well looked after and has won many awards.
- 5.33 The Norfolk-wide Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS) is a joint local planning authority and Natural England approach which aims to deliver strategic mitigation to offset recreational impacts on European designated sites (i.e. the north Norfolk Coast SAC /SPA etc.) from qualifying development (residential and tourism) and ensure compliance with the Conservation of Habitats and Species Regulations (2017) as amended.

Policy HOLT4 - Employment Growth in Holt

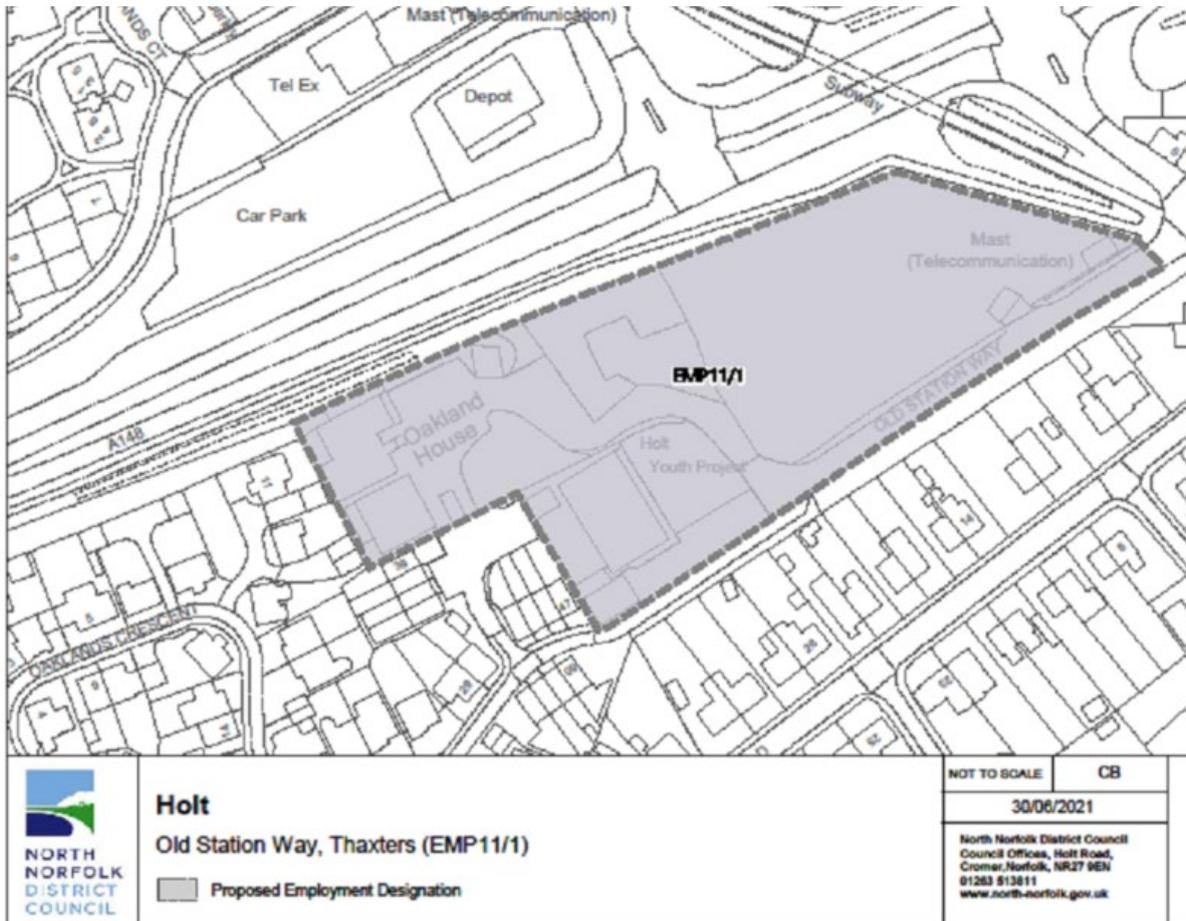
- 1) Proposals to intensify designated employment areas and on land allocated for employment development will be supported provided they comprise only uses falling within Use Class B2, B8, E(g)³. An exception is land at Old Station Way (see Plan G), which may also be used as a primarily convenience food retail class E(a) or hotel use (C1) provided it is of a scale which does not harm the vitality and viability of the town centre or neighbouring centres, satisfies the sequential test and conforms to other development plan policies.
- 2) Proposals for a C1 hotel use will be supported not only in the designated town centre area but also in other locations within the built form of the settlement or updated settlement boundary, whichever is applicable, provided they satisfy the requirements of the sequential test and are suitably located in respect of the amenity of any adjoining, residential properties and in having a site frontage to either the A148, Norwich Road (B1149), Cromer Road, Kelling Road, Thornage Road (B1110), Nightjar Road or Old Station Way.



- 5.34 Local Plan policies seek to protect employment sites for uses that maintain the functional integrity of land supporting businesses. There is a need to ensure that the employment needs of Holt are addressed by restricting uses that are not suitable to the unique location for employment and protect the viability and vitality of the town centre as a retail and service hub. This policy restricts the potential for retail and service industry uses on these sites but allows general and light industry and offices. This helps to maintain a critical mass of this type of employment in the town.
- 5.35 Flexibility is introduced in the case of the employment site at Old Station Way (see Plan G) where there is potential for a retail or hotel use. Permission was granted in 2014 ref: for retail ref: PF/14/1373 subject to conditions including limits on convenience and non-convenience sales in order to protect the vitality and viability of the town centre. The North Norfolk Retail & Main Town Centre Uses Study, Final Report (2017), Lichfields

³ As defined by the Town and Country Planning Use Classes Order 1987 (as amended) or subsequent re-enactment.

supports the continuation of this retail permission in the interests of the sustainability of the retail function of the town serving a growing population and complementing other town centre uses. This site is particularly well-related to the town centre and there is no clear prospect of town centre sites becoming available.



Plan G - An extract from the Policies Map for the Emerging Local Plan, Jan 2022

- 5.36 The policy allows this exception, in principle, but there will be a need to reconsider the scale, retail impact, the availability of any preferred sites under the sequential test and any site-specific issues at the time of any planning application. Similar conditions apply to the consideration of a hotel proposal. The second part of the policy is not confining hotel proposals to the town centre but recognising there are other suitable locations within the town’s Settlement Boundary (as defined by the Local Plan). They include the Old Station Way site identified in the first clause, should proposals for a retail use not come forward.
- 5.37 Tourism is a key element of the local economy with many tourists being drawn to Holt, the fine 18th century Georgian buildings make the town, with its small market town character, one of the most attractive in North Norfolk. This character is derived not only from the historic town centre, with many period buildings, but also from the attractive countryside, which surrounds the town and its proximity to the North Norfolk coast.
- 5.38 Tourism is seen as a growth sector both for day and overnight visits. Promoting tourism is one of the HNP Objectives and links to achieving part of the Mission Statement of ... “As the gateway to the North Norfolk coast...” The community is keen to see Holt make the most of its advantages.
- 5.39 The town is relatively compact and easy to navigate on foot, even more so with the promotion of the Holt Green Wheel of Policy HOLT7. There is therefore not the same need as may be necessary in larger settlements to require prospective hotel investors in

Holt to compete against other town centre businesses in acquiring scarce land by requiring them to prove there are no available sites in the town centre boundary. However, hotel uses can generate car movements from occupiers and so the policy requires that proposals should be located on a main road frontage and show that they would be 'good neighbours' with surrounding residential areas.

Policy HOLT5 - Community Facilities

1) The Neighbourhood Plan identifies the following, on Plan H, as Community Facilities:

- A. The Venue (Community Centre)
- B. Holt Playing Fields (Woodfield Road)
- C. Holt Youth Project (Station Way)
- D. The Treehouse (Charles Road)
- E. Scout Hut (Permanent) (Cley Road)
- F. Owl Playgroup Building (Valley Lane)
- G. Little Lambs (St Andrew's Church Hall, Church Street)

2) Development proposals that would result in the loss of buildings and land currently, or last used for a Community Facility will not be permitted unless:

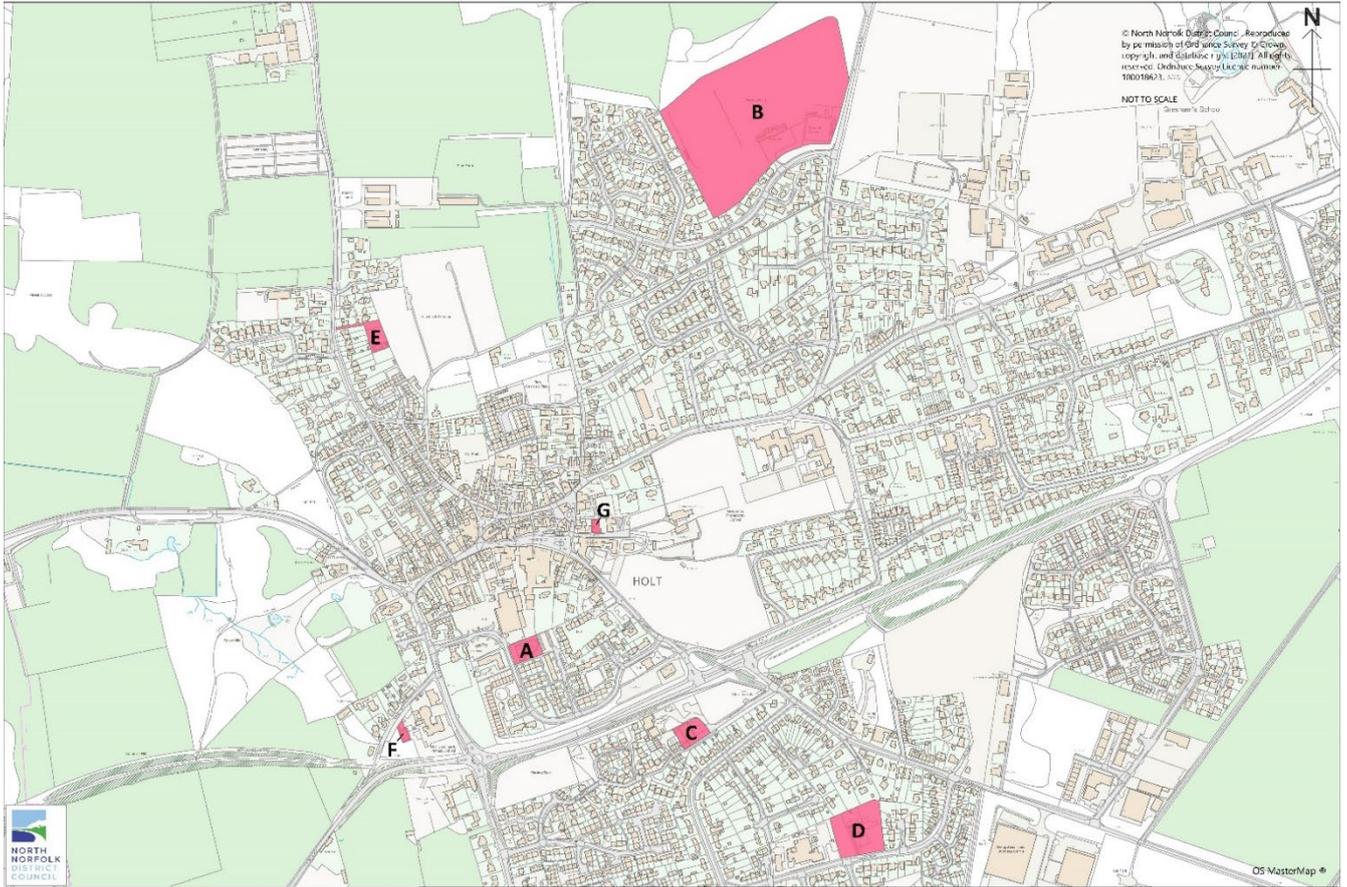
- alternative provision of an equivalent, or better quality, facility is available in Holt; or,
- it meets the tests of the development plan to justify that loss.

5.40 In its first clause, this policy identifies those community facilities in Holt to which Policy HC 3 of the emerging Local Plan will apply. Its second clause makes some minor changes to refine the wording of HC 3 in respect of alternative provision.

5.41 Community facilities are an important focus for the town to encourage social cohesion and wellbeing. There are a large number of well-supported clubs and societies running across Holt, although it is expected that existing facilities will come under increasing pressure to meet the increasing demands from a growing and ageing population. Proposals for high quality community facilities that encourage daily social interaction or community-based events will be supported.

5.42 The Town Council has therefore reviewed the role played by each facility to understand its continued importance and to ascertain if it has capacity problems as the local population grows. Although any loss would be concerning, the policy requires that loss is made up for with the provision of better facilities that are conveniently located to serve the town.





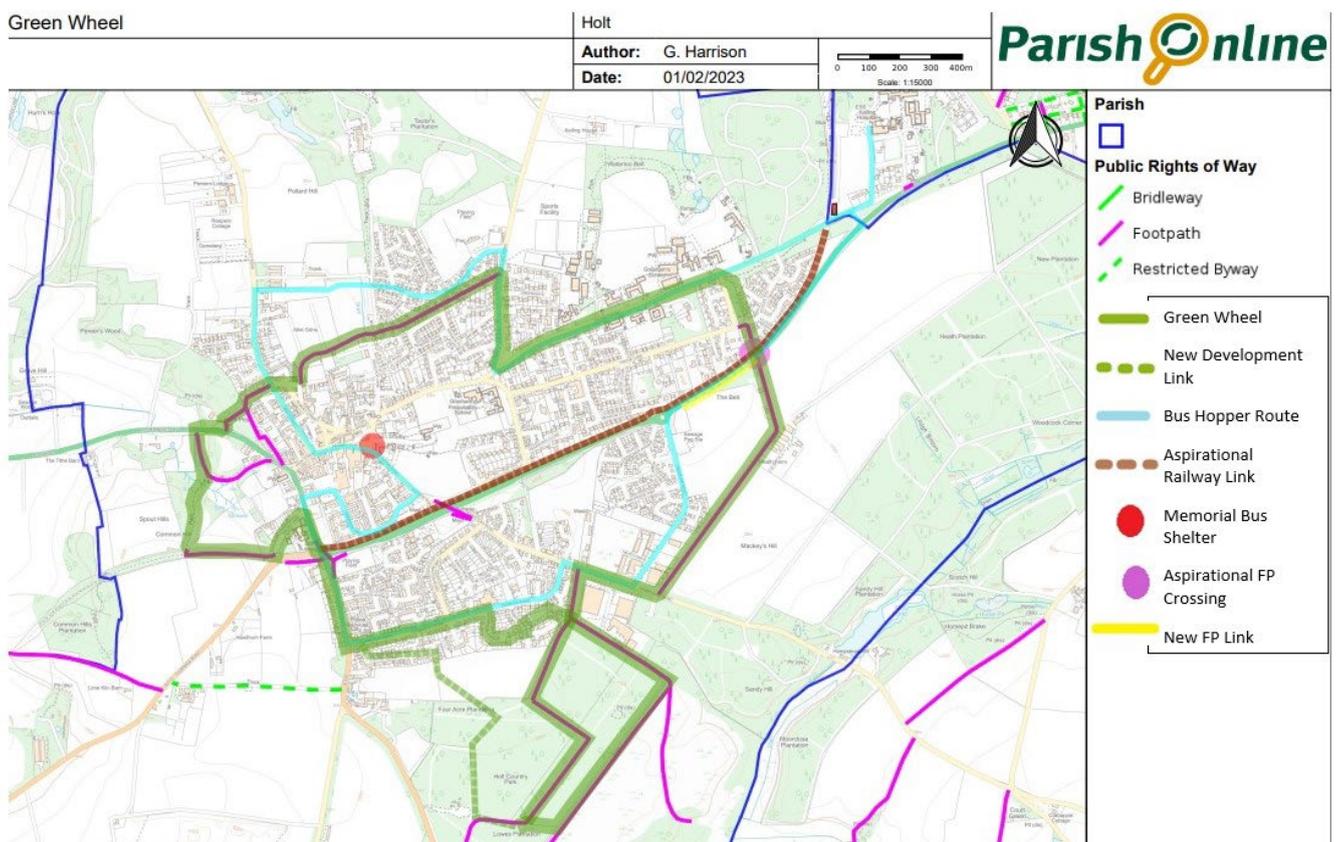
Plan H: Community Facilities in Holt (Source: NNDC)

Policy HOLT6 - Connectivity In And Around Holt

The Neighbourhood Plan identifies a Green Wheel comprising public footpaths, cycle routes, bridleways, quiet streets/lanes and public transport assets and routes.

- 1) Proposals for major development, as defined by national planning policy, should include proposals to allow people to access the Green Wheel in safe and convenient ways, both within the site through its layout, access arrangements and permeability and beyond the site boundary.
- 2) Where proposals require mitigation measures to address their effects on the quality or extent of the Green Wheel, they will be required to make financial contributions in accordance with national guidance.

5.43 This policy introduces the Holt Green Wheel concept as illustrated on Plan I. Its first clause translates the green infrastructure principles of Policy CC11 of the emerging Local Plan into a specific, mapped and broader network of walking, cycling etc. routes. Its second and third clauses refine the wording of Policy CC 9 on sustainable transport, as well as of CC11 to fit with the Wheel concept.



Plan I: Holt Green Wheel (Source: Holt Town Council)

5.44 The Green Wheel brings together public access, and open green spaces and forms a circuit around the town of Holt to connect people and their environment. It will also seek to provide and promote connections into and out of the town including to businesses and tourist attractions in the surrounding area. In addition, it will promote themes of

biodiversity, heritage, and landscape and it will benefit the whole community, improving the health and increasing the enjoyment of the countryside around the town by people of all ages.

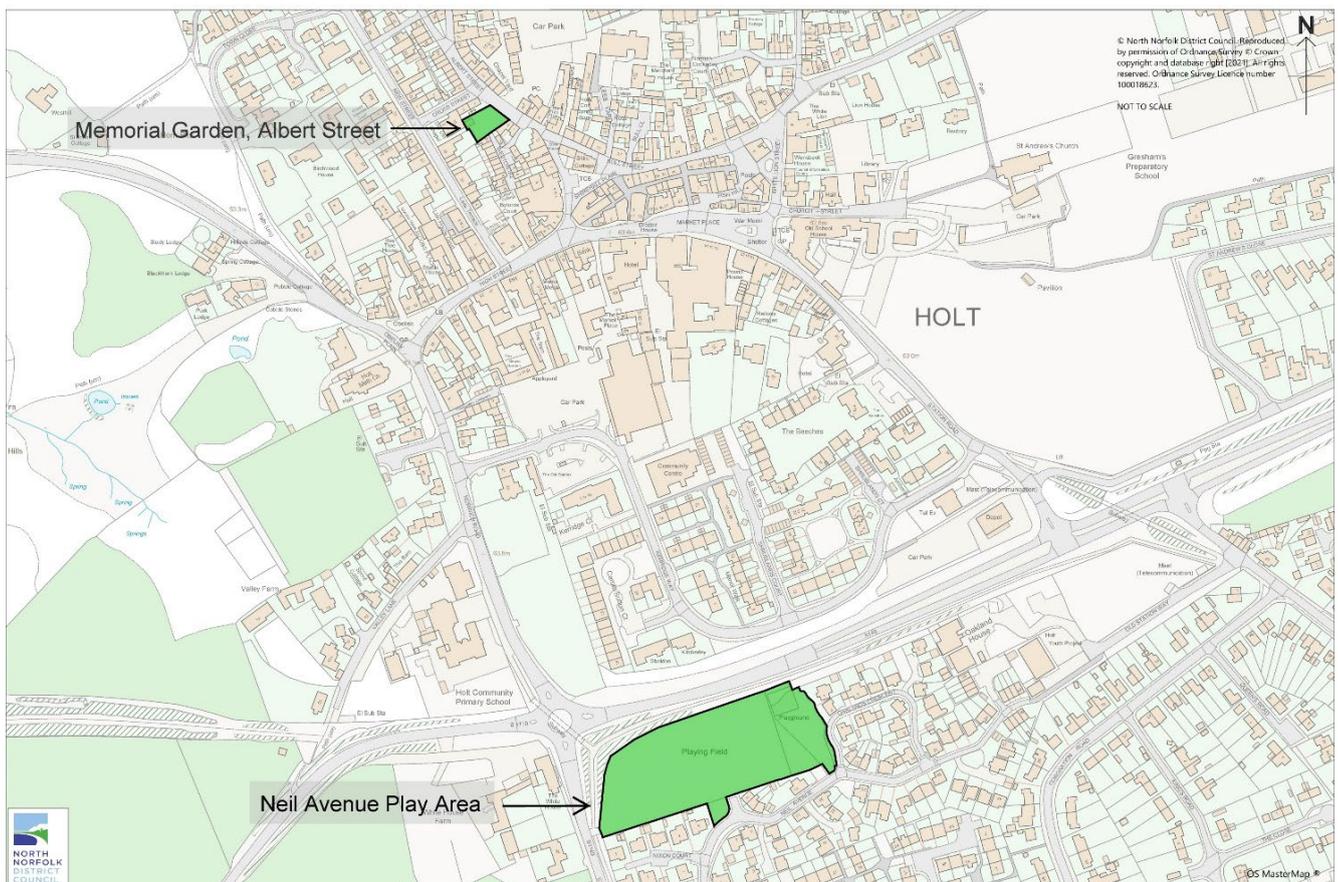
- 5.45 The Holt Green Wheel is a long-term vision for linking of publicly accessible green spaces and routes around the town to create a circular route, which is supported by ‘spokes’ of linear paths and corridors, leading from the settlement, out to the settlement boundary and the wider surrounding countryside. The Wheel is considered ‘green’ due to the natural and historic environment. The Green Wheel will also seek to provide and promote connections into and out of the town including to businesses and tourist attractions in the surrounding area by integrating with public transport services, notably the Hopper Bus and potential new station for the proposed Norfolk Orbital Railway (see Section 6).
- 5.46 The existing Public Rights of Way network and connectivity in Holt is poor. Holt has no Public Bridleways or Byways open to all traffic, only 2 restricted byways and 16 Public Footpaths. Connectivity between public rights of way and public green spaces is poor with the main public open space in the town, Holt Country Park, accessed primarily by car. The second largest public open space in Holt is Spout Hills and Little Hills which is dissected by the busy A148. NNDC’s Open Space Assessment in 2020 actively encourages towns to seek to provide further open space provision.
- 5.47 The Holt Green Wheel will cater for a wide range of users, meeting recreation, commuting and other service needs. Green spaces and associated features forming the Green Wheel may both be trip destinations in their own right; or may be corridors to other attractions along the wheel. The Wheel looks to deliver enhanced public access, improving connectivity between popular public open spaces in the town, as well as protecting, managing, and promoting other green infrastructure assets, including biodiversity, landscape, and heritage. Where possible, new habitats, landscape features and accessible greenspaces and corridors should be created.
- 5.48 Greenspaces forming the Green Wheel will range from linear paths and corridors, through amenity greenspaces to natural and semi-natural open spaces in the wider countryside. Where aspirational routes or uses have been identified then landowner consent will be sought to agree access. Where necessary, Holt Town Council will seek to ensure that the appropriate legal process, (whether through permissive agreements or legal orders), is carried out in parallel with any physical construction works needed.
- 5.49 The entire Green Wheel will be freely available to walkers and eventually cyclists. In the short term, some sections may only cater for walkers, but the long-term aim is to create a complete circuit available to cyclists, including the provision of links to the National Cycle Route (NCR) 1 which runs 14 miles west of the town and links nearby towns such as Wells-next-the-Sea in the northwest and Reepham in the south. NCR 1 is a long-distance route from Dover to Scotland, it is an aspiration for Holt to connect to this popular well publicised cycle route. Sites forming the Green Wheel will be clearly signposted to and from the Green Wheel and the wider network; will be welcoming and clean and safe; will provide informal and engaging activities for people of all ages; and will seek to maximise ecological value and opportunities
- 5.50 The Green Wheel is adjacent to the Holt Lowes SSSI and the North Valley Fens SAC which are important designations on account of their value for biodiversity. In accordance with national and Local Plan policies these areas are protected from any extra pressure brought about by the increased opportunities for access.

Policy HOLT7 - Open Spaces

The Neighbourhood Plan identifies Memorial Garden and Neil Avenue Play Area as open spaces, as shown on the Policies Map. Development on the following open spaces will not be permitted unless:

- 1) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and local accessibility and the alternative provision is made available for use prior to the loss of the area of open space to be built upon; or,
- 2) It can be demonstrated that the recreational use is surplus to requirements within Holt and that any loss would not result in a current or likely shortfall during the plan period, taking into account alternative forms of open space and recreation in Holt.

5.51 This policy complements Local Plan policies concerned to protect areas of open space valued for their recreational and visual amenity qualities. The assessment of the impact of any loss of open space will be done in relation to the most recent audit of such space in the area.⁴



Plan J: Memorial Garden (top) and Neil Avenue Play Area (bottom) Open Spaces (Sources: NNDC)

⁴ The North Norfolk Open Space Assessment, Part of the Open Space, Sport and Recreation study 2019, North Norfolk District Council, Final version February 2020, Ethos Environmental Planning.

6. IMPLEMENTATION

- 6.1 The Neighbourhood Plan policies will be implemented through the determination of planning applications for development in the Parish by NNDC as the local planning authority.

Development Management

- 6.2 NNDC will use a combination of the Local Plan and Neighbourhood Plan policies to inform and determine its planning application decisions. The Town Council is a statutory consultee on planning applications made in its area and it will be made aware of any future planning applications or alterations to those applications by the planning authority. It will seek to ensure that the Neighbourhood Plan policies have been identified and applied correctly by applicants and by officers in reaching their decision.

7. COMMUNITY ASPIRATIONS

7.1 The following are the Town Council's aspirations and community initiatives which are related to planning matters but which cannot be directly controlled by planning legislation or cast with real certainty.

Local Infrastructure Improvements

7.2 National policy advises that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Where opportunities arise through Section 106 agreements to secure financial contributions to invest in improving local infrastructure, the Town Council propose that the priorities for investment of future contributions are:

- Improve disabled access in round Holt Town Centre.
- Footpath to Country Park along the Norwich Road.
- Support introduction of the Holt Green Wheel.
- Support introduction of the Norfolk Orbital Railway.
- Develop and improve public transport links (bus and train).
- Facilitate the creation of a 'Farmers Market or Street Market' to promote local produce.
- Enhance Holt's three retail loops.
- Shop front improvements.
- Making small improvements to replace red paving, improve A148 roundabout.
- Remove unnecessary street furniture.
- New pedestrian crossing on High Street.
- Improve bus stops.
- Provide more cycle parking in town centre.
- Establish new commercial space/employment land.
- Seek additional residential care facilities.

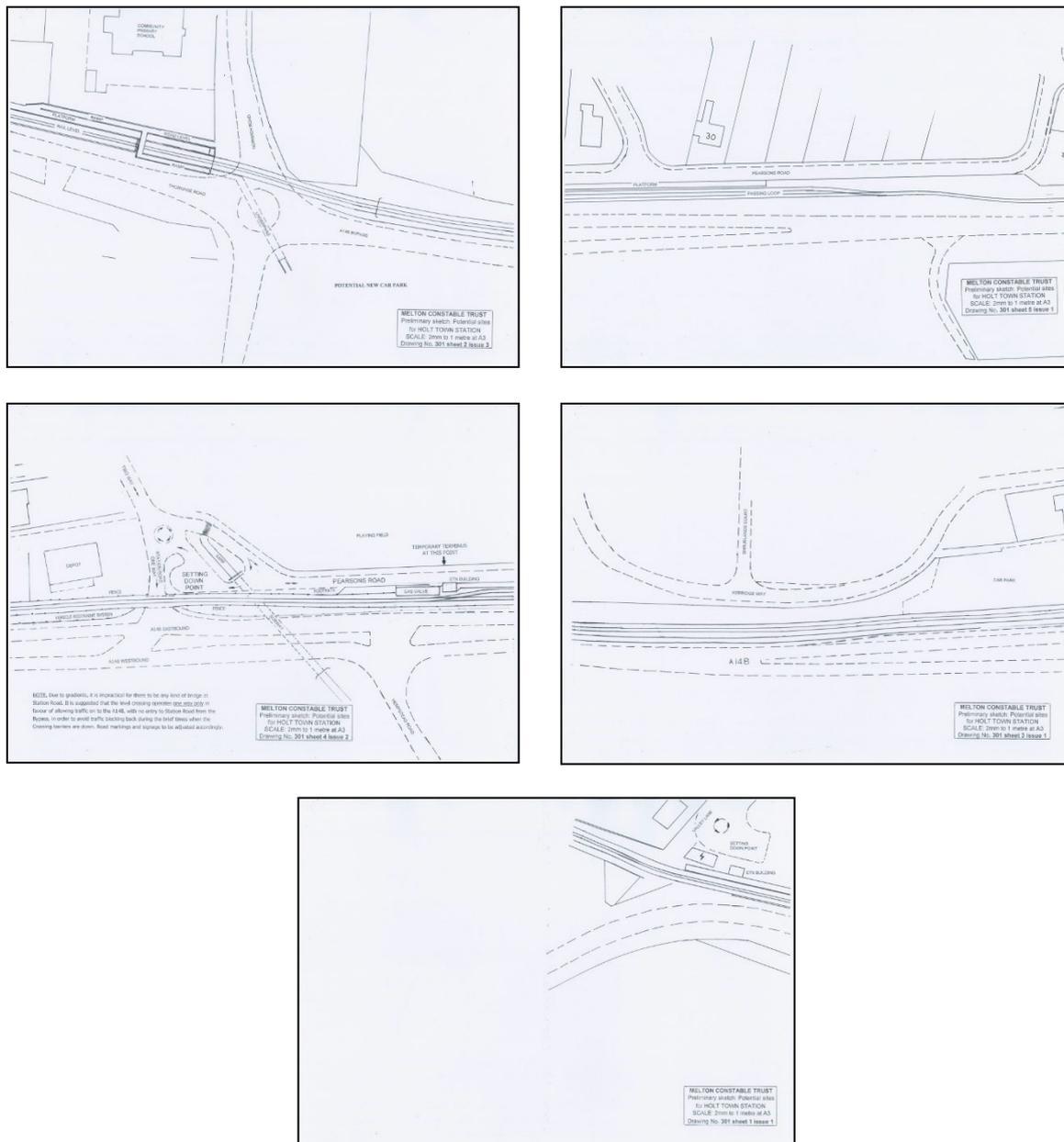
The Future of Rail Travel for Holt

7.3 The aspirational plans to return train travel to Holt, via the Norfolk Orbital Railway (NOR), via the reinstatement of the North Norfolk Railing Line have always been borne in mind in the Neighbourhood Plan and is supported by Holt Town Council. It will bring positive support to car-free travel, tourism and sustainable travel.

7.4 The NOR is a project, promoted by a small group of volunteers, that aspires to reinstate a public transport service using modern trains to parts of Norfolk which suffered badly from railway closures in the 1960's. Its principal goal is to provide the very thing for which railways were created: to transport people safely and efficiently for work and leisure purposes. This new railway could also be used by heritage services; further, opportunities for transporting freight by rail are also being pursued. The environmental benefits of rail travel are of major importance, in line with modern thinking about global warming.

7.5 The aim of the NOR will link the North Norfolk Railway (NNR) at High Kelling to Fakenham, where it will join the Mid Norfolk Railway (MNR), which is extending its railway between Wymondham and Dereham through to Fakenham. This, combined with the existing Bittern Line between Norwich and Sheringham, will create a modern rail transport system which will link many of the towns and villages in North Norfolk. These objectives are in line with government policy (reversing Beeching) and the Parliamentary Group's report

titled 'Public transport on heritage railways'. The reconstruction of the railway will be subject to the legal process of a Transport and Works Order. The aim is for the new railway to host services operated by the Train Operating Company which has the franchise for the operation of The Bittern Line between Norwich and Sheringham. The construction of the full orbital route is a long-term project which will proceed by achievable stages, thus phasing expenditure. The next, and critically important, stage is to extend the railway into Holt.



Plan K: Indicative Plans for new Holt Railway Station on the Norfolk Orbital Railway (Source: Melton Constable Trust)

- 7.6 An indicative scale plan of the potential route to Holt for the railway has been produced. Following investigations by NOR, site visits and surveys, two possible locations for Holt railway station (the Station) have been identified (see Plan K). These have been discussed with representatives of the Town Council, who have guided the choice of the optimum site options, which takes into account local needs. The aspirational site will be on the southern edge of the land currently occupied by Holt Community Primary School (the school), which is scheduled for redevelopment following the relocation of the school to a new site in Holt. Only a narrow strip of land, approximately 7 meters wide, will be

required, as illustrated on the preliminary sketch of the potential site for the station and the immediate surrounding area. Consequently, a substantial majority of the current site of the school will be available for other developments.

- 7.7 The next priorities are to acquire land needed for the route into Holt, to obtain the necessary official permissions and then to begin the construction of the railway over this first part of the NOR route. This has been done before and is being done again. The NNR extended its line from Weybourne to High Kelling in the 1980's, and the MNR is currently making good progress in extending its line from Dereham to County School on the way to Fakenham. There is a margin of land on the North side of the Holt by-pass belonging to Norfolk County Council (NCC) which can accommodate the railway. Some years ago NCC offered this land for the construction of this part of the NOR at little or no cost, although this decision would need to be ratified. An expert railway engineer has demonstrated that there are adequate clearances to accommodate the railway. The Holt by-pass is an existing transport corridor, therefore occasional trains will be hardly noticeable among the existing constant traffic.
- 7.8 Holt Town Council supports the aspiration to build a railway into Holt as it could establish a link with the Bittern Line, thus enabling people who live in and around Holt to travel by train to locations including Sheringham, Cromer and Norwich. This extended rail link will assist members of the public to travel to and from new, as well as existing, places of work, will attract more visitors to Holt, reduce the acute pressure for additional car parking and enhance local business opportunities. Further, it will enable the NNR to take its heritage trains into Holt, which will further raise its importance as the major tourist attraction in North Norfolk. Consequently, the above could result in a reduction in social exclusion, increased economic activity and fewer road accidents. The use of modern trains will bring significant environmental benefits, including taking traffic off the roads and a reduction in greenhouse gases.



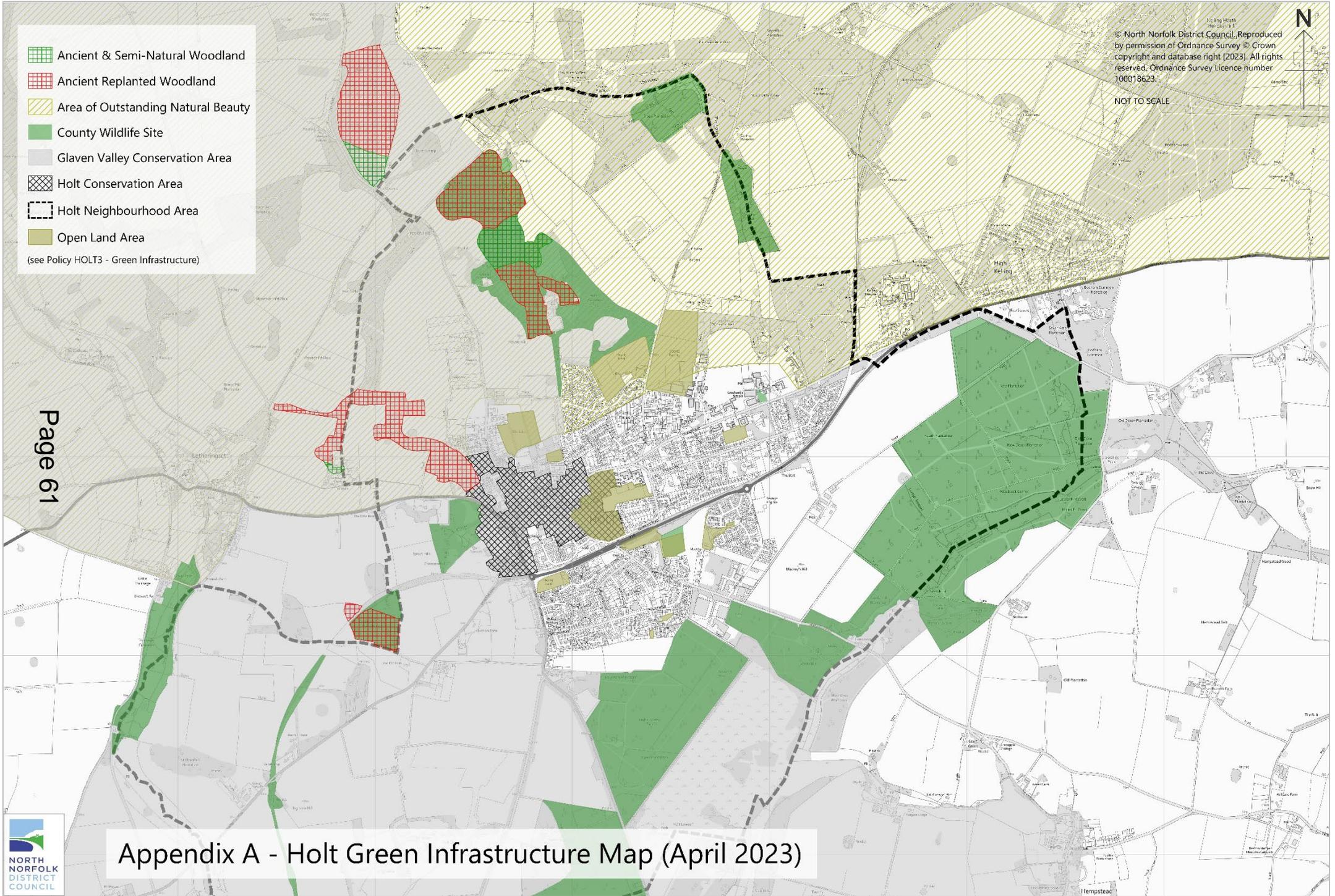
-  Ancient & Semi-Natural Woodland
-  Ancient Replanted Woodland
-  Area of Outstanding Natural Beauty
-  County Wildlife Site
-  Glaven Valley Conservation Area
-  Holt Conservation Area
-  Holt Neighbourhood Area
-  Open Land Area
(see Policy HOLT3 - Green Infrastructure)

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Appendix A - Holt Green Infrastructure Map (April 2023)



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Horning Knackers Wood Updated Joint Position Statement	
Executive Summary	The report updates Members on the revised. Joint Position Statement with regard to the Horning Knackers Wood Water Recycling Centre catchment.
Options considered	None
Consultation(s)	The updated Joint Position statement has been undertaken collaboratively with the Broads Authority, Environment Agency, Anglian Water and NNDC
Recommendations	It is recommended that Members of the Planning Policy & Built Heritage Working Party note the contents of the updated Joint Position Statement and recommend to Cabinet that it authorises the Assistant Director of Planning in conjunction with the Planning Policy Team Leader as signatory to the updated JPS and incorporation of any minor changes as a result of EA or other LPA sign off process.
Reasons for recommendations	To provide updated planning guidance for the District.
Background papers	2017 Joint position Statement re Horning Knackers Wood Wastewater recycling centre and the updated Anglian Water position through the Anglian water Statement of Fact

Wards affected	Horning
Cabinet member(s)	Andrew Brown Portfolio holder for Planning
Contact Officer	Iain Withington Planning Policy Team Leader iain.withington@North-Norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Local homes for local need theme of the Council's Corporate Plan 2019- 2023 and the cross-cutting delivery mechanism through the emerging Local Plan
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	The Councils Development Plan: including the Core Strategy and emerging Local Plan

Corporate Governance:	
Is this a key decision	No

Has the public interest test been applied	No
Details of any previous decision(s) on this matter	Previous Joint Position Statement was agreed between the Broads authority, Environment Agency, Anglian Water and NNDC in 2017.

1. Purpose of the report

- 1.1 The purpose of this report is to update members with regard the Joint Position Statement in the Horning Knackers Wood Water Recycling Centre Catchment.

2. Introduction & Background

- 2.1 As detailed in the Councils Infrastructure Delivery Plan [Examination Library Document Reference C4], Horning Knackers Wood Water Recycling Centre discharges to the river Bure. In doing so, this Water Recycling Centre (WRC) contributes nutrient loads to the downstream watercourses as well as to the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC) and Broadland Special Protection Area (SPA). The river Bure is currently of high-status water quality, and it is important that this is not jeopardised by development. The Horning WRC does not currently have capacity to accommodate further foul flows and flows remain above the permitted Environment Agencies, (EA) license.

- 2.2 There have been a number of recorded incidents of flooding with the Horning sewerage catchment from surface water, groundwater and fluvial sources which are the responsibility of multiple agencies. This reduces the available capacity of the foul sewerage network for additional foul flows from additional development within the catchment. Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. This means that measures need to be taken to reduce the flows the Centre receives from across the catchment. If the flows continue to rise, there is a risk of increased nutrient loading to the river and therefore deterioration in water quality. There is also increased risk of sewer flooding. No strategy is put forward in the Anglian Water's draft Drainage and Wastewater Management Plan, DWMP however Investment is confirmed in the Water Recycling Long-term Plan.

- 2.3 A Joint Position Statement (JPS) was first issued by the North Norfolk District Council, Environment Agency, EA, Broad's Authority, and Anglian Water in 2017 (Appendix A) which put in place a presumption against development in Horning that increase the flows and standalone foul water treatment solutions, as they also have the potential to adversely affect water quality.

3. Proposals and Options

- 3.1 Since the JPS Anglian Water have been undertaking investigations to understand why the WRC is receiving excessive flows and they concluded that the unstable ground conditions in this area are the cause of continued

structural failures of both the public sewerage network managed by Anglian Water and privately-owned drainage network. When combined with the high-water table and frequent over topping there are high levels of groundwater infiltration and inundations to both private and public foul water systems through multiple points, most is outside their remit to control.

- 3.2 Anglian Water have concluded that there is no single engineering solution which can be provided by Anglian Water and as such have published the Statement of Fact April 2022 (Appendix B) and have formally withdrawn from the Previous Joint Position Statement. They are however continuing a number of network improvements mainly along Ferry Road and Ferry View Road where there remain a number of unauthorised connections to AW infrastructure, pipe collapses and infrastructure vulnerable to over topping. Such investment includes a proposal on third party land to install pumping unit which will reduce the flows from over topping and flooding.
- 3.3 Despite the Statement of Fact and Anglian Water's revised position the Environment Agency still consider that development is not feasible at Horning and the EA maintain their objection due to the flow being significantly greater than the EA permit and no reasonable prospect of situation changing in the short to medium time frame.
- 3.4 A revised Joint position statement between the LPAs (Broad's Authority, and NNDC and the Environment Agency, EA) has been subsequently drafted and agreed with the main parties. The aim is that the revised JPS updates the position to present day and reference the AW position and that of the EA and can be used to inform planning matters.
- 3.5 The updated position Statement is attached as Appendix C with a tracked change version from the original in Appendix D

4. Corporate Priorities

The report is relevant to the local homes for local need theme of the Council's Corporate Plan 2019- 2023 and the cross-cutting delivery mechanism through the emerging Local Plan

5. Financial and Resource Implications

The report has no immediate or direct impact on council resource or financial strategy.

6. Legal Implications

- 6.1 There are no direct legal implications to note in relation to the content of the report.

7. Risks

- 7.1 There are no direct risks associated with this report.

8. Net Zero Target

8.1 No assessment has been made against the council's [Net Zero Strategy & Action plan](#)

9. Equality, Diversity & Inclusion

9.1 Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.2 There are no direct implications on equality within this report.

10. Community Safety issues

N/A.

11. Conclusion and Recommendations

It is recommended that Members of the Planning Policy & Built Heritage Working Party note the contents of the updated Joint Position Statement and recommend to Cabinet that it authorises the Assistant Director of Planning in conjunction with the Planning Policy Team Leader as signatory to the updated JPS and incorporation of any minor changes as a result of EA or other LPA sign off process.

Appendix A:2017 Joint Position Statement

Appendix B:2022 Statement of Fact April 2022

Appendix C:2023 Joint Position Statement (updated)

Appendix D:2023/ 2017 Tracked Change Version

Joint Position Statement on Development in the Horning Water Recycling Centre Catchment

Prepared by Anglian Water Services and the Environment Agency.

This statement has been prepared to support Local Planning Authorities in their decision making on development in Horning, North Norfolk.

Background

Horning Knackers Wood Water Recycling Centre discharges to the River Bure. In doing so, this Water Recycling Centre (WRC) contributes nutrient loads to the downstream watercourses as well as to the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA).

Concerns regarding development in the catchment of the WRC (see enclosed) relates to the potential impact of rising nutrient loads on the river and sensitive downstream receptors. At present, the main River Bure achieves 'high status' for water quality (very good quality), and the Bure Broads and Marshes SSSI predominantly meets the water quality thresholds. As a minimum, our objectives are to ensure that there is no deterioration in water quality in the river and that the water quality thresholds set out in the Conservation Objectives for the European protected site continue to be met. Further details on the needs of the European Site are available from Natural England.

A high quality water environment is an integral part of the natural environment, providing a good habitat for plants, animals and quality of life benefits for local people. Water resources and a high quality water environment underpin economic development, by providing water for households, industries, agriculture, recreation and tourism. The 'high status' water quality in the River Bure is atypical for East Anglian rivers, making this a particularly important catchment to safeguard. The 'high status' is due in part to the significant investment that the water company have made since the 1990s to reduce phosphorus concentrations in effluent to protect the Broads as well as ongoing work by the Environment Agency to identify and address poor water quality across the wider catchment. This investment, and the environmental and socio-economic benefits it has delivered, should not be jeopardised by development.

To ensure that there is no increased risk to water quality, there must be no increase in nutrient loading from the Horning WRC above that assessed by the Environment Agency under the 'Review of Consents' project which concluded in 2007. Any development that could increase foul water flows to the WRC could increase the loading from the Centre.

Policy Background

Policy HOR6 of the North Norfolk Site Allocations DPD (February 2011) states that development will be required to 'demonstrate that there is adequate capacity in sewage treatment works and no adverse effect from water quality impacts on European Wildlife Sites.'

Policy HOR1 of the Broads Authority Site Specific Policies DPD adopted 2014 states that:

Joint Position Statement on Development in the Horning Catchment

'To ensure the protection of designated sites, no new development requiring connection to the public foul drainage system within the Horning Catchment, should take place until it is confirmed capacity is available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development.' Policies HOR2, 5 and 7 support or re-iterate this policy.

Local Authority Responsibilities

The legal framework for the protection, improvement and sustainable use of waters is provided by the Water Framework Directive (WFD) which was enacted into UK law in December 2003.

Under the UK Regulations, local authorities must have regard to the plans developed to deliver the Regulations in exercising their functions. This means that they need to reflect the priorities and objectives (as described above) in local planning policies, infrastructure delivery plans and in the determination of individual planning applications. With regards development in the Horning catchment, the main priorities and objectives are to ensure no deterioration in river water quality and to meet the Conservation Objectives for the Bure Broads and Marshes SSSI/ SAC/ SPA.

Local authorities and other public bodies are also required to provide information and "such assistance as the Environment Agency may reasonably seek in connection with its WFD functions."

Local authorities, along with other public bodies, have a general responsibility not to compromise the achievement of UK compliance with EU Directives, including the WFD. Non-compliance with EU Directives could potentially lead to the European Commission bringing legal proceedings and fines against the UK. The Localism Act 2011 includes a new power for UK Government to potentially require public authorities (including local authorities) to make payments in respect of EU financial sanctions for infraction of EU law if the authority has caused or contributed to that infraction. In theory, this power applies to infractions of WFD requirements, including deterioration of water body status, though in practice, Government and the Environment Agency would seek to work with a local authority to resolve the situation and avoid levying penalty payments.

The Localism Act also sets out the duty to cooperate, which requires local planning authorities to co-operate on cross-boundary planning issues, including, as stated in the National Planning Policy Framework, the provision of infrastructure for water supply and water quality, as well as climate change adaptation and conservation and enhancement of the natural environment.

Horning Water Recycling Centre

Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) does not currently have capacity to accommodate further foul flows. This means that measures need to be taken to reduce the flows the Centre receives from across the catchment. Some work has already been done, and further work is planned. These are detailed below. If the flows continue to rise there is a risk of increased

nutrient loading to the river and therefore deterioration in water quality. There is also increased risk of sewer flooding.

Anglian Water Services (AWS) have undertaken investigations to identify why the WRC is receiving excessive flows. They found that due to its location and proximity to the Broads, the sewerage system in Horning has long had an issue with the ingress of water, either from groundwater infiltration, where water seeps into underground pipework, or from surface water from street drainage and similar, or from fluvial water, when the Broads over tops into the streets of Horning and subsequently floods via manholes into the sewerage system.

In an attempt to alleviate flows getting into the sewerage system, in 2014/15 Anglian Water carried out camera surveys of all of its owned sewers and any that had shown to have groundwater ingress have been replaced or relined.

Out of the entire network of 9.5km, a total of 1.5km has been repaired and six manholes have been rebuilt and/or sealed against infiltration. While this work was successful in reducing the groundwater ingress into the sewerage network, this has not totally resolved the flow issues.

The Highways Authority (Norfolk County Council) have been working with Anglian Water, and are progressing the removal of two surface water drainage gullies from the Anglian water sewerage system.

Anglian Water are progressing the building of a hydraulic model to better understand the flow and capacity within the system. This is due for completion at the end of the 2016-17 financial year.

This scheme is ongoing and will inform further remedial works upon the network. A subsequent period of 12 months of monitoring of flows to assess the efficacy of the scheme and whether there is capacity to accept additional flows will be required by the Environment Agency.

Implications for Development in Horning

Whilst flows to the Water Recycling Centre remain high, measures to reduce existing flows and prevent additional flows to the catchment need to be taken. Development that could increase the flows to the Water Recycling Centres therefore needs to be avoided. All opportunities to prevent and reduce clean surface, ground or fluvial water entering the sewage system also need to be taken.

New developments or changes to existing properties (commercial or domestic) that could increase foul water flows to the Horning WRC will not be looked upon favourably by the EA, Anglian Water or the undersigned until the excessive flows to the Centre have been addressed with confidence. It is considered that 12 months-worth of the continuously collected flow monitoring data from the WRC, will provide enough evidence to determine the effectiveness of each tranche of works upon the system, and allow review of the acceptability of development.

This means that there will be a presumption against developments that increase flows to the WRC in the short term. Similarly, there will be a presumption against developments that rely upon stand alone foul water treatment solutions as they too have the potential to adversely affect water quality.

This position statement will be reviewed after each tranche of works on the system, and again after the collection of 12 months post-works data.

The capacity that the infiltration scheme will free up at the WRC is difficult to predict and so the quantum of development that will be able to come forward in the future is currently unknown.

We are keen to ensure the water infrastructure is adequately considered upfront without unduly blocking development, whilst continuing to safeguard Habitats Directive sites, and meet the objectives of the Water Framework Directive. Developers will need to engage with relevant parties in order to identify and progress solutions, indeed AWS and EA actively encourage pre-application discussions. We are committed to work with all parties to progress solutions to enable development in Horning.



Hannah Wilson
Planning Liaison Manager
Anglian Water



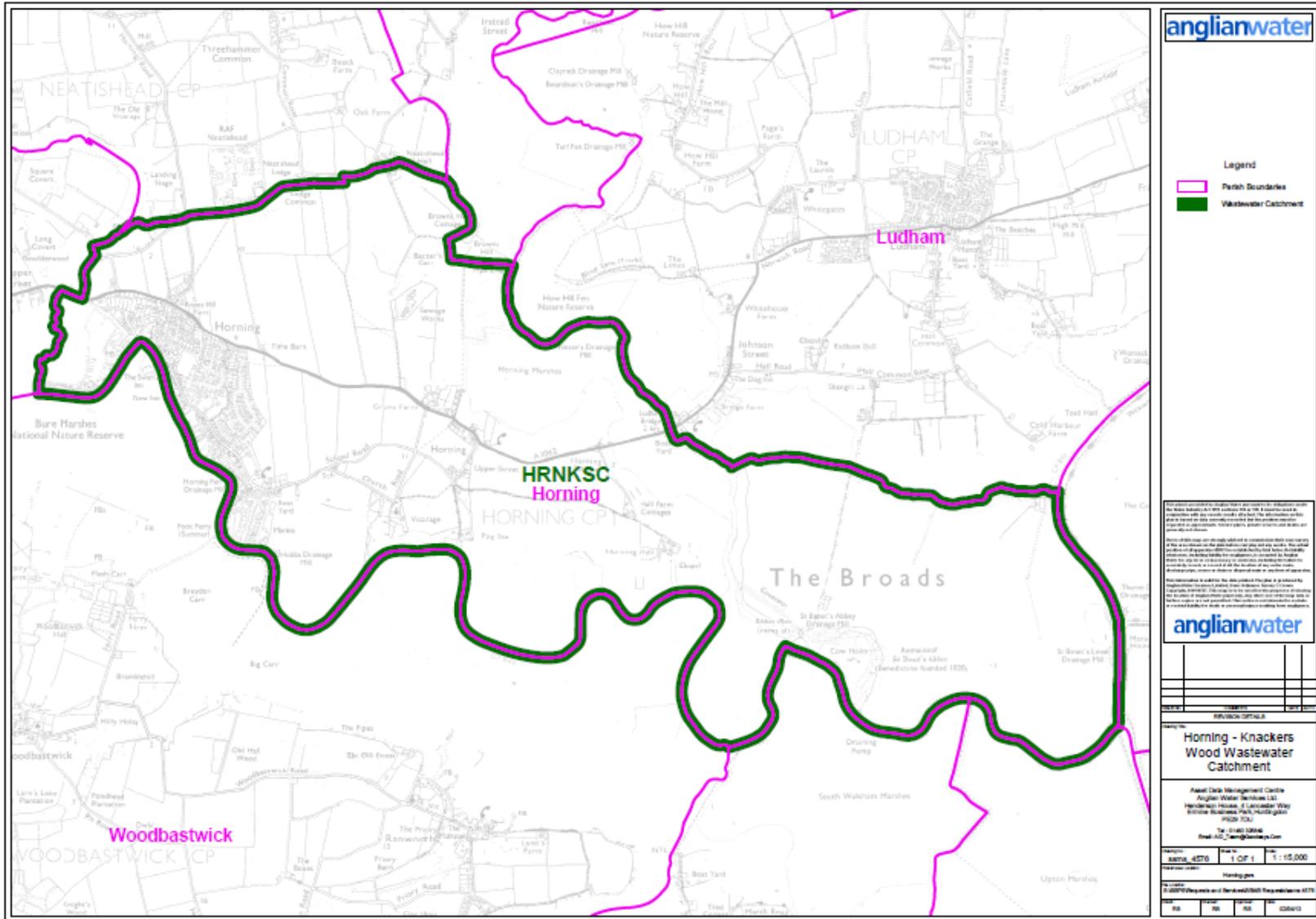
Jo Firth
Sustainable Places Team Leader
Environment Agency



Nicola Baker
Head of Planning
North Norfolk District Council



Cally Smith
Head of Planning
Broads Authority



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- Legend**
- Parish Boundaries
 - Wastewater Catchment

Anglian Water is not responsible for any errors or omissions in this map. It is provided as a guide only and should not be used for any other purpose. The information on this map is subject to change without notice. Anglian Water reserves the right to amend the map at any time without notice. The information on this map is provided as a guide only and should not be used for any other purpose. The information on this map is subject to change without notice. Anglian Water reserves the right to amend the map at any time without notice.

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Horning - Knackers Wood Wastewater Catchment

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Project:	Horning				

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HORNING STATEMENT OF FACT

Issue Date: April 2022

Summary

A conventional sewerage network in the Riverside area of Horning has proven to be unsustainable due to changes in ground conditions and prevailing hydrology in the area.

Ground conditions in this area are the cause of structural failures of both the public sewerage network managed by Anglian Water and privately-owned drainage network. Soil in the area is predominantly peat over laying crag (sand and gravel), which is porous and has low cohesion and as such is subject to continual movement. This results in displaced pipe joints and collapse due to lack of ground support. This is endemic in the area and will affect both the public sewerage and private networks. When combined with the permanently high-water table this results in a high level of groundwater infiltration.

Also, in times of river flooding much of the area is underwater resulting in inundation to the public and private foul water (FW) drainage networks through multiple and various points.

It should be noted that much of this excess surface water ingress is not intentionally connected but enters the system through defects and overland flooding.

Horning Knackers Wood Water Recycling Centre (WRC)

The river flooding and groundwater infiltration into the network results in the WRC being flow non-compliant. However, an assessment of legitimate flows to the WRC based on both potable water supplied to the area and on the population it serves shows the WRC would be compliant with its permit without the excess surface water ingress. If circumstances allowed for the FW sewerage network to operate within the intended parameters, the WRC would be compliant with its permit.

Historic Investigations

Date	Investigations by Anglian Water
2000	Groundwater/surface water Infiltration along Ferry View Road found that large scale groundwater/surface water inundation was present as a result of damage to private laterals.
2002	CCTV survey was undertaken
2014	Sewer rehabilitation scheme completed
2015	Excess flows still an issue at Ferry View Terminal Pumping Station
2016	Survey identified infiltration into both public and private systems together with surface water connections
2017	Horning Flooding Assessment undertaken – conclusion; continued settlement of the ground leads to more operational issues.
2018	Horning Road sewer collapse, refurbishment of subsided sewer on Ferry Road completed Feb 2018
2018	Requests made to property owners to remove surface water connections
July 2021	CCTV surveyed the sewers connecting in Ferry View Road and Ferry Road
Aug 2021	Further survey work in Ferry View Road

Rainfall Data

From the investigations completed it is likely that the amount of rainfall is not the most significant influence on the sewerage system. There are some direct surface water connections to the FW network, however, the impact of these is insignificant compared to the impact of river/ground water infiltration.

Groundwater Levels

The groundwater level is directly linked to the river level. Much of the public sewerage network is below the low water level of the river and the surrounding soil type is porous

Highway Drainage

The road gully on Ferry Road is connected to the foul sewer. Various discussions have taken place with the Norfolk County Council as Local Highway Authority and Lead Local Flood Authority, North Norfolk District Council as Local Planning Authority, businesses and the Environment Agency regarding its removal. The highway at this location is unadopted and the ownership of the gully has not been established.

Long-term Flooding Vulnerability

Climate change observation and predictions indicate increases in high river levels and the frequency of high flow conditions. This will expose more of the FW networks to surface water inundation and may also increase ground movement around pipework, leading to more points of infiltration.

Next Steps

Anglian Water will continue to operate and maintain the public sewerage network in Horning and will respond to loss of services as appropriate.

We will continue to discuss with the Environment Agency and look at other possible interventions in relation to WRC compliance and the operation of the public sewerage network.

We would like to address the following issues related to privately owned drainage, which can only be achieved through continued partnership working:

- Ferry Road, 2No. private chambers to be sealed
- Ferry Cott Lane manhole 5702 seal chamber to prevent infiltration
- Ferry View Road manholes 6401 and 6504 and 1No. private chamber to be sealed to address ground water infiltration
- Ferry View Road connection of private lateral and sewer to be repaired to eliminate source of groundwater infiltration
- Ferry View Road pumping station, raise cover level and install new sealed cover to prevent surface water entering the wet well

Our Water Recycling Long Term Plan (WRLTP) outlined a scheme, then proposed in business plan, to increase dry weather flow (DWF) at Horning Knackers Wood WRC. However, this will not improve the existing issues of infiltration. Consequently, we have not committed to the increase of DWF at the WRC, as we need to understand the impact of the infiltration removal work to be able to correctly design for the increase in capacity. Whilst recognising the challenges of the geology and hydrology the increase in permit DWF will be reviewed alongside other actions.

However, as the issues are predominantly related to river flooding, it involves assets outside of our ownership and prevailing environmental conditions that compromise standard drainage techniques / practices. Therefore, there is no immediate engineering solution available to Anglian Water that can provide effective mitigation of the impact of the excess surface water ingress. Furthermore, Anglian Water does not have the remit under WIA 1991 to entirely fund all solutions.

New Development

When assessing planning applications, we comment on the capacity within the foul sewerage network on the basis of catchment and flows it was intended and designed to accommodate. When necessary and appropriate, we may request planning conditions for development sites connecting to the public foul network, that reflects practicable limits that a developer could implement to ensure the addition flow can be accommodated at the agreed point of connection. The provision of additional capacity downstream of the point of connection is the responsibility of Anglian Water.

All opportunities to prevent and reduce the amount of surface water ingress to the foul sewerage network will also be taken and we will collaborate with developers to exploit these opportunities where practicable.

We will also work with other organisations to ensure that the impacts on the FW sewerage are understood by those tasked with managing surface waters.

We are keen to ensure the FW sewerage infrastructure is adequately considered upfront without unduly blocking development, whilst continuing to safeguard operational performance.

Conclusion

Groundwater and surface water infiltration continually occurs to both the public sewer and private drainage systems, despite various attempts to rectify. The higher the river level the more drainage network is below the water table and the worse infiltration becomes. In high river level conditions flooding to the riverside area occurs and the sewerage system is inundated. The continued infiltration results in the WRC breaching its Dry Weather Flow Permit.

Climate change is likely to affect prevailing environmental and hydrological conditions, which will further adversely impact the FW drainage networks.

Ownership of the highway drain has yet to be confirmed and whether it drains directly to the foul sewer or pumped direct to the river continues to be unresolved.

We have a duty to protect our assets and we have already gone beyond this duty to ensure options have been considered and investigated. Anglian Water have held various meetings between all interested parties including the Lead Local Flood Authority, Environment Agency, Local Planning Authority and members of the public.

There is no single engineering solution which can be provided by Anglian Water and the issues being experienced primarily relate to continued existing infiltration and inundation. Also, as the effected assets included private drainage and the impacted roads are in private ownership, the *need* does not easily meet investment criteria for either Anglian Water or other stakeholders. Therefore, identifying partnership funding has proven difficult.

As stated above we will work with developers and all interested parties to ensure a suitable drainage strategy is developed which mitigates any flooding and environmental risk from proposed development sites. We will work within both the Water Industry Act 1991 and Town Planning legislation and request planning conditions where appropriate.

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Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment

Date August 2023

Prepared by the Broads Authority, North Norfolk District Council and the Environment Agency.

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Appendix 2: Statement of Fact, Anglian Water Services, February 2022..... 8

1. Introduction

1.1. This statement has been prepared to support Local Planning Authorities in their decision making on development in Horning, North Norfolk. This is an update from the previous Joint Position Statement that was adopted/endorsed in 2017.

2. Background

2.1. Horning Knackers Wood Water Recycling Centre discharges to the River Bure. In doing so, this Water Recycling Centre (WRC) contributes nutrient loads to the downstream watercourses as well as to the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA).

2.2. Concerns regarding development in the catchment of the WRC ([Appendix 1](#)) relates to the potential impact of rising nutrient loads on the river and sensitive downstream receptors and excess flows caused from water ingress into the system (from surface water, river over topping and the resultant groundwater infiltration which is compounded through defects in the public and private network). The environmental permit limits for Knackers Wood WRC are set to preserve the

quality of water in the watercourse downstream of the discharge point both to ensure that there is no deterioration in Water Framework Directive status and that decisions support measures to help the waterbody to achieve good ecological potential, nor deterioration in Conservation Objectives. The permit limits are several, set against modelled conditions specific to that waterbody and interdependent with each other. Currently, one of the permit limits, Dry Weather Flow is in exceedance by a significant amount. At present, the section of the river Bure that receives the discharge from Knackers Wood has an overall WFD status of 'moderate' and also 'moderate' for ecological potential. As a minimum, our objectives are to ensure that there is no deterioration in water quality in the river and that the water quality thresholds set out in the Conservation Objectives for European protected sites continue to be met or bettered. Further details on the needs of the European Site are available from Natural England.

2.3. The pressures caused by excessive volume puts river water quality at risk in two main ways:

- a) Clean groundwater and surface water will be mixed with foul water which is then treated to the discharge concentration expected for a normal foul water flow. This has the potential to increase the concentrations of nutrient load in the waterbody. To illustrate this, where a water company wants to increase its volumetric flow, its sanitary permit is tightened requiring physical alterations to the WRC to remove a greater proportion of nutrients.
- b) WRCs have storm water tanks which are there to store excess foul water flows in storm conditions to be treated when capacity is available and to prevent the WRC being overwhelmed and discharging untreated foul water into rivers. The size of the storm water tanks is set based on the permitted volumetric flow. At Horning WRC, the stormwater storage capacity is being taken up by the excessive flows even in normal weather which leaves little capacity for storms. This increases the risk of untreated foul water being discharged in the Bure. This is a significant threat to water quality and the 'no deterioration' objectives.

2.4. The environmental permit issued in respect of the discharge to the river has two elements: the sanitary permit and the volumetric permit. Both elements are set by the Environment Agency at a level to ensure that the discharge to the river Bure does not cause deterioration of the Water Framework Directive classification of that waterbody and support the objectives of the River Basin Management Plan. The volumetric permit is set both to ensure that the total chemical and bacterial loading does not exceed safe limits and that stormwater capacity designed to prevent discharge of untreated foul water into the river is not overloaded. **Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to**

the continued ingress of surface and groundwater.

3. Anglian Water Services' Stance

3.1. Anglian Water formally withdrew from the 2017 Horning Position Statement in April 2022 and issued a Statement of Fact which updated their position in relation to new development and their continued commitments and liabilities around operation and maintenance of the public sewer network in Horning.

'Since the 2017 Position Statement we have undertaken investigations and work to protect our assets from river flooding and surface water entering the foul system. There is no single engineering solution which can be provided by Anglian Water and the issues being experienced primarily relate to continued infiltration and inundation.

We have published the Horning Statement of Fact (see Appendix 2), which sets out the investigation and work we have undertaken to date and how we will respond to new development proposals within the Horning WRC catchment.

We are committed to engaging with key stakeholders going forward and will update the Statement of Fact as and when needed'.

4. Policy Background

4.1. Policy HOR6 of the [North Norfolk Site Allocations DPD](#) (February 2011) states that development will be required to 'demonstrate that there is adequate capacity in sewage treatment works and no adverse effect from water quality impacts on European Wildlife Sites.'

4.2. It should be noted that at the time of drafting, an updated North Norfolk Local Plan was submitted for examination. That document will replace the 2011 Site Allocations DPD once adopted. In the emerging Plan there are no specific site allocations identified in Horning but the issues identified are incorporated into policies: CC7; Flood Risk & Surface Water Drainage and CC13; Protecting Environmental Quality and relevant proposals will need to demonstrate adequate water treatment and disposal exists or can be provided in time to serve any proposal. Proposals will need to comply with statutory environmental quality standards and demonstrate, individually or cumulatively, that any development would not give rise to adverse impacts on the natural environment, including water quality.

4.3. Policy DM2 of the Local Plan for the Broads (adopted 2019) says *'To ensure the protection of designated sites, no new development that increases foul water flows requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment will be permitted, until it is confirmed that capacity is available within the foul sewerage network and at the Water Recycling Centre to*

serve the proposed development’.

5. Local Authority Responsibilities

5.1. The legal framework for the protection, improvement and sustainable use of waters is provided by the Water Framework Directive (WFD) which was enacted into UK law in December 2003. Since the UK left the EU, all European laws were transposed into UK Law.

5.2. Under the UK Regulations, local authorities must have regard to the Plans developed to deliver the Regulations in exercising their functions. This means that they need to reflect the priorities and objectives (as described above) in local planning policies, infrastructure delivery plans and in the determination of individual planning applications. With regards to development in the Horning catchment, the main priorities and objectives are to ensure no deterioration and seek an improvement in river water quality and to meet the Conservation Objectives for the Bure Broads and Marshes SSSI/ SAC/ SPA.

5.3. Local authorities and other public bodies are also required to provide information and “such assistance as the Environment Agency may reasonably seek in connection with its WFD function.

5.4. The WFD was incorporated into UK law separately as The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. Local authorities, along with other public bodies, have a general responsibility not to compromise the achievement of compliance with relevant EU Directives and the Water Environment Regulations (2017); if we don’t comply with the requirements then it is contravention of our own law.

5.5. The Localism Act also sets out the duty to cooperate, which requires local planning authorities to co-operate on cross-boundary planning issues, including, as stated in the National Planning Policy Framework, the provision of infrastructure for water resources and water quality, as well as climate change adaptation and conservation and enhancement of the natural environment.

6. Horning Water Recycling Centre

6.1. The Environment Agency has confirmed that Horning Knackers Wood Water Recycling Centre is exceeding its permitted volumetric flow and therefore does not currently have capacity to accommodate further foul flows. This means an increased risk of further nutrient loading to the river and therefore deterioration in

water quality. There is also increased risk of sewer flooding.

6.2. Anglian Water Services (AWS) have undertaken investigations to identify why the WRC is receiving excessive flows. They concluded that due to its location and proximity to the Broads, the sewerage system in Horning has long had an issue with the ingress of water, either from groundwater infiltration, where water seeps into underground pipework, or from surface water from street drainage and similar, ~~or~~ and from fluvial water, when the Broads over tops into the streets of Horning and subsequently floods via manholes into the sewerage system. Investigations found that ground conditions in this area are the cause of structural failures of both the public sewerage network managed by Anglian Water and the further privately-owned drainage network, which when combined with the permanently high-water table results in a high level of groundwater infiltration. It should be noted that much of this excess surface water ingress is not intentionally connected but enters the system through defects and overland flooding.

6.3. For more details on these investigations and also the actions Anglian Water Services have undertaken, along with the commitment next steps, please see [Appendix 2](#).

7. Implications for Development in Horning

Whilst flows to the Water Recycling Centre remain high, measures to reduce existing flows and prevent additional flows to the catchment need to be taken. Development that could increase the flows to the Water Recycling Centre therefore needs to be avoided. All opportunities to prevent and reduce clean surface, ground or fluvial water entering the sewage system also need to be taken.

New developments or changes to existing properties (commercial or domestic) that could increase foul water flows to the Horning WRC will not be looked upon favourably by the EA and LPAs, until the excessive flows to the Centre have been addressed with confidence, or if further innovations in technology and permitting are introduced.

This means that there will be a presumption against developments that increase flows to the WRC. Similarly, there will be a presumption against developments that rely upon stand-alone foul water treatment solutions in sewered areas as they too have the potential to adversely affect water quality and are not subject to the environmental monitoring of a regulated water company. Rules in respect of permitting stand-alone foul water treatment solutions can be found at the following link:

[General binding rules: small sewage discharge to a surface water - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water)

We (LPAs and Environment Agency) are keen to ensure the water infrastructure is adequately considered upfront without unduly blocking development, whilst continuing to safeguard Habitats Directive sites, and meet the objectives of the Water Framework Directive. AWS

Joint Position Statement on Development in the Horning Catchment

have committed to address a number of issues, as detailed in their Horning Statement of Fact (see [Appendix 2](#)) and are committed to discuss with the EA in seeking further possible interventions in order to regain WRC compliance and the operation of the public sewer network.

Developers will need to engage with relevant parties in order to identify and progress possible interventions; indeed AWS, the LPAs and EA actively encourage pre-application discussions. Developers will need to engage with relevant parties in order to identify possible interventions that can ensure no potential net addition to foul water flows. AWS, the LPAs and EA encourage pre-application discussions.

We are committed to work with all parties to progress solutions to enable development in Horning.

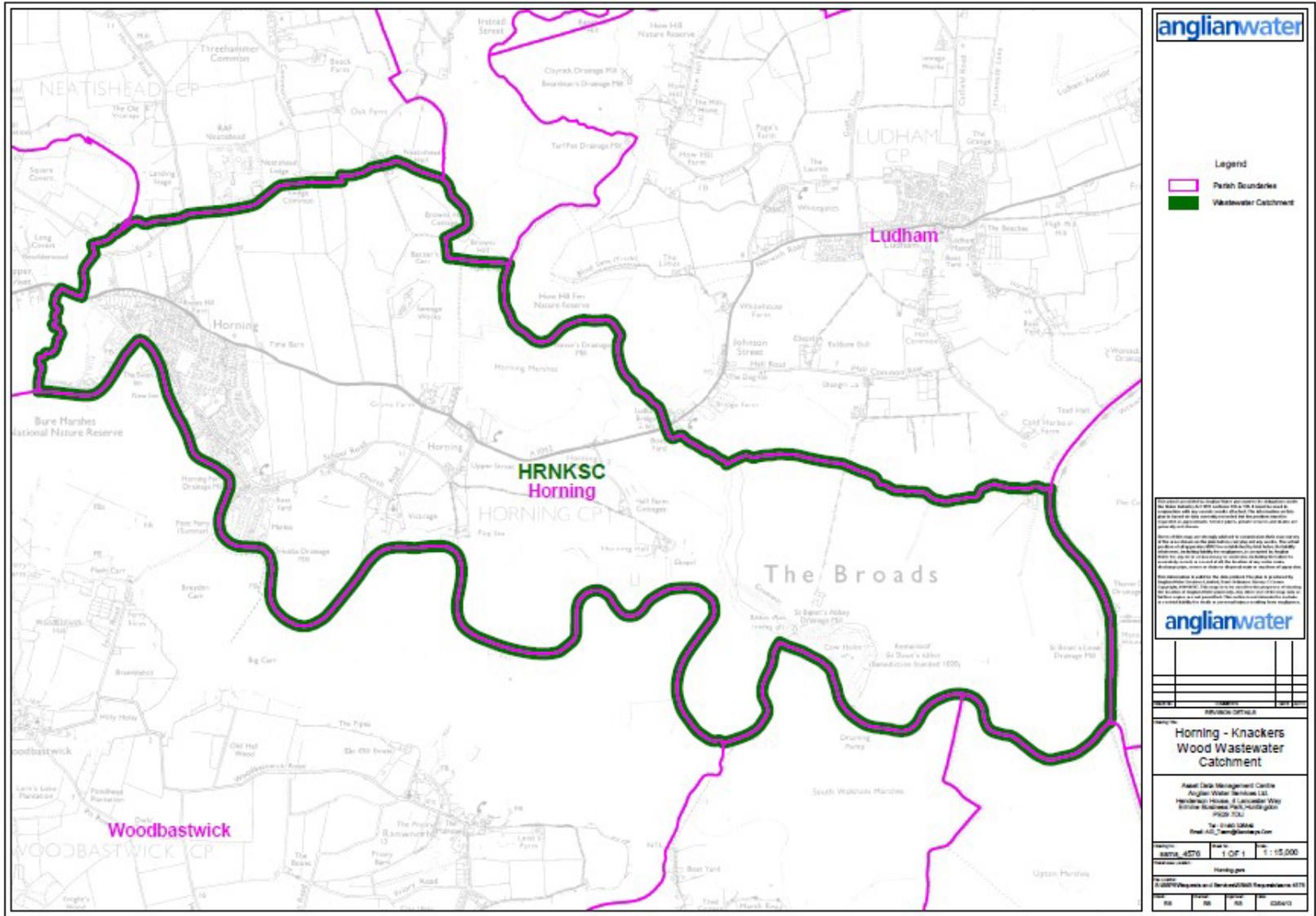
This position statement will be reviewed every 12 months.

xxx
Jo Firth
Sustainable Places Team Leader
Environment Agency

xxx
Russell Williams
Assistant Director
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Cally Smith
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Appendix 1: Horning Knackers Wood Water Recycling Centre Catchment



Appendix 2: Statement of Fact, Anglian Water Services, February 2022.

Joint Position Statement on Development in the Horning Knackers Wood Water Recycling Centre Catchment

Date xxxx

Prepared by ~~Anglian Water Services and~~ the Broads Authority, North Norfolk District Council and the Environment Agency.

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1. Introduction

1.1. This statement has been prepared to support Local Planning Authorities in their decision making on development in Horning, North Norfolk. This is an update from the previous Joint Position Statement that was adopted/endorsed in 2017.

2. Background

2.1. Horning Knackers Wood Water Recycling Centre discharges to the River Bure. In doing so, this Water Recycling Centre (WRC) contributes nutrient loads to the downstream watercourses as well as to the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA).

2.2. Concerns regarding development in the catchment of the WRC (Appendix 1) relates to the potential impact of rising nutrient loads on the river and sensitive downstream receptors and excess flows caused from water ingress into the system (from surface water, river over topping and the resultant groundwater infiltration which is compounded through defects in the public and private network). The environmental permit limits for Knackers Wood WRC are set to preserve the

quality of water in the watercourse downstream of the discharge point both to ensure that there is no deterioration in Water Framework Directive status and that decisions support measures to help the waterbody to achieve good ecological potential, nor deterioration in Conservation Objectives. The permit limits are several, set against modelled conditions specific to that waterbody and interdependent with each other. Currently, one of the permit limits, Dry Weather Flow is in exceedance by a significant amount. At present, the section of the river Bure that receives the discharge from Knackers Wood has an overall WFD status of 'moderate' and also 'moderate ' for ecological potential. ~~At present, the main River Bure achieves 'high status' for water quality (very good quality), and the Bure Broads and Marshes SSSI predominantly meets the water quality thresholds.~~ As a minimum, our objectives are to ensure that there is no deterioration in water quality in the river and that the water quality thresholds set out in the Conservation Objectives for European protected sites continue to be met or bettered. Further details on the needs of the European Site are available from Natural England.

2.3. The pressures caused by excessive volume puts river water quality at risk in two main ways:

- a) Clean groundwater and surface water will be mixed with foul water which is then treated to the discharge concentration expected for a normal foul water flow. This has the potential to increase the concentrations of nutrient load in the waterbody. To illustrate this, where a water company wants to increase its volumetric flow, its sanitary permit is tightened requiring physical alterations to the WRC to remove a greater proportion of nutrients.
- b) WRCs have storm water tanks which are there to store excess foul water flows in storm conditions to be treated when capacity is available and to prevent the WRC being overwhelmed and discharging untreated foul water into rivers. The size of the storm water tanks is set based on the permitted volumetric flow. At Horning WRC, the stormwater storage capacity is being taken up by the excessive flows even in normal weather which leaves little capacity for storms. This increases the risk of untreated foul water being discharged in the Bure. This is a significant threat to water quality and the 'no deterioration' objectives.

2.4. The environmental permit issued in respect of the discharge to the river has two elements: the sanitary permit and the volumetric permit. Both elements are set by the Environment Agency at a level to ensure that the discharge to the river Bure does not cause deterioration of the Water Framework Directive classification of that waterbody and support the objectives of the River Basin Management Plan. The volumetric permit is set both to ensure that the total chemical and bacterial

loading does not exceed safe limits and that stormwater capacity designed to prevent discharge of untreated foul water into the river is not overloaded. **Horning Knackers Wood WRC is in protracted exceedance of the volumetric permit due to the continued ingress of surface and groundwater.**

~~Horning Knackers Wood Water Recycling Centre discharges to the River Bure. In doing so, this Water Recycling Centre (WRC) contributes nutrient loads to the downstream watercourses as well as to the Bure Broads and Marshes Site of Special Scientific Interest (SSSI), a component of the Broads Special Area of Conservation (SAC)/ Broadland Special Protection Area (SPA).~~

~~Concerns regarding development in the catchment of the WRC (see enclosed) relates to the potential impact of rising nutrient loads on the river and sensitive downstream receptors. At present, the main River Bure achieves 'high status' for water quality (very good quality), and the Bure Broads and Marshes SSSI predominantly meets the water quality thresholds. As a minimum, our objectives are to ensure that there is no deterioration in water quality in the river and that the water quality thresholds set out in the Conservation Objectives for the European protected site continue to be met. Further details on the needs of the European Site are available from Natural England.~~

~~A high quality water environment is an integral part of the natural environment, providing a good habitat for plants, animals and quality of life benefits for local people. Water resources and a high quality water environment underpin economic development, by providing water for households, industries, agriculture, recreation and tourism. The 'high status' water quality in the River Bure is atypical for East Anglian rivers, making this a particularly important catchment to safeguard. The 'high status' is due in part to the significant investment that the water company have made since the 1990s to reduce phosphorus concentrations in effluent to protect the Broads as well as ongoing work by the Environment Agency to identify and address poor water quality across the wider catchment. This investment, and the environmental and socio-economic benefits it has delivered, should not be jeopardised by development.~~

~~To ensure that there is no increased risk to water quality, there must be no increase in nutrient loading from the Horning WRC above that assessed by the Environment Agency under the 'Review of Consents' project which concluded in 2007. Any development that could increase foul water flows to the WRC could increase the loading from the Centre.~~

3. Anglian Water Services' Stance

3.1. Anglian Water formally withdrew from the 2017 Horning Position Statement in April 2022 and issued a Statement of Fact which updated their position in relation to new development and their continued commitments and liabilities around operation and maintenance of the public sewer network in Horning.

'Since the 2017 Position Statement we have undertaken investigations and work to protect

Joint Position Statement on Development in the Horning Catchment

our assets from river flooding and surface water entering the foul system. There is no single engineering solution which can be provided by Anglian Water and the issues being experienced primarily relate to continued infiltration and inundation.

We have published the Horning Statement of Fact (see [Appendix 2](#)), which sets out the investigation and work we have undertaken to date and how we will respond to new development proposals within the Horning WRC catchment.

We are committed to engaging with key stakeholders going forward and will update the Statement of Fact as and when needed’.

4. Policy Background

4.1. Policy HOR6 of the North Norfolk Site Allocations DPD (February 2011) states that development will be required to ‘demonstrate that there is adequate capacity in sewage treatment works and no adverse effect from water quality impacts on European Wildlife Sites.’

4.2. ~~It should be noted that at the time of writing, an updated North Norfolk Local Plan is due to be submitted for examination. That document will replace the Site Allocations DPD. In the emerging Plan there are no specific site allocations in Horning and the relevant policies are: CC7 and CC13.~~ It should be noted that at the time of drafting, an updated North Norfolk Local Plan was submitted for examination. That document will replace the 2011 Site Allocations DPD once adopted. In the emerging Plan there are no specific site allocations identified in Horning but the issues identified are incorporated into policies: CC7; Flood Risk & Surface Water Drainage and CC13; Protecting Environmental Quality and relevant proposals will need to demonstrate adequate water treatment and disposal exists or can be provided in time to serve any proposal. Proposals will need to comply with statutory environmental quality standards and demonstrate, individually or cumulatively, that any development would not give rise to adverse impacts on the natural environment, including water quality.

4.3. Policy DM2 of the Local Plan for the Broads (adopted 2019) says ‘To ensure the protection of designated sites, no new development that increases foul water flows requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment will be permitted, until it is confirmed that capacity is available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development’.

~~Policy HOR1 of the Broads Authority Site Specific Policies DPD adopted 2014 states that: ‘To ensure the protection of designated sites, no new development requiring connection to the public foul drainage system within the Horning Catchment, should take place until it is confirmed capacity is available within the foul sewerage network and at the Water~~

~~Recycling Centre to serve the proposed development.’ Policies HOR2, 5 and 7 support or re-iterate this policy.~~

5. Local Authority Responsibilities

5.1. The legal framework for the protection, improvement and sustainable use of waters is provided by the Water Framework Directive (WFD) which was enacted into UK law in December 2003. Since the UK left the EU, all European laws were transposed into UK Law.

5.2. Under the UK Regulations, local authorities must have regard to the Plans developed to deliver the Regulations in exercising their functions. This means that they need to reflect the priorities and objectives (as described above) in local planning policies, infrastructure delivery plans and in the determination of individual planning applications. With regards t o development in the Horning catchment, the main priorities and objectives are to ensure no deterioration and seek an improvement in river water quality and to meet the Conservation Objectives for the Bure Broad and Marshes SSSI/ SAC/ SPA.

5.3. Local authorities and other public bodies are also required to provide information and “such assistance as the Environment Agency may reasonably seek in connection with its WFD function.

5.4. The WFD was incorporated in to UK law separately as The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. Local authorities, along with other public bodies, have a general responsibility not to compromise the achievement of ~~UK~~ compliance with ~~EU Directives, including the WFD~~ relevant EU Directives and the Water Environment Regulations (2017); if we don’t comply with the requirements then it is contravention of our own law.

~~5.5. Non-compliance with EU Directives could potentially lead to the European Commission bringing legal proceedings and fines against the UK. The Localism Act 2011 includes a new power for UK Government to potentially require public authorities (including local authorities) to make payments in respect of EU financial sanctions for infraction of EU law if the authority has caused or contributed to that infraction. In theory, this power applies to infractions of WFD requirements, including deterioration of water body status, though in practice, Government and the Environment Agency would seek to work with a local authority to resolve the situation and avoid levying penalty payments.~~

5.6. The Localism Act also sets out the duty to cooperate, which requires local planning authorities to co-operate on cross-boundary planning issues, including, as stated in the National Planning Policy Framework, the provision of infrastructure for water ~~supply~~ resources and water quality, as well as climate change adaptation and conservation and enhancement of the natural environment.

6. Horning Water Recycling Centre

6.1. The Environment Agency has confirmed that Horning Knackers Wood Water Recycling Centre is exceeding its permitted volumetric flow ~~Both Anglian Water and the Environment Agency agree that the Horning Knackers Wood Water Recycling Centre (WRC) and therefore~~ does not currently have capacity to accommodate further foul flows. ~~This means that measures need to be taken to reduce the flows the Centre receives from across the catchment. Some work has already been done, and further work is planned. These are detailed below. If the flows continue to rise there is a risk of increased~~ an increased risk of further nutrient loading to the river and therefore deterioration in water quality. There is also increased risk of sewer flooding.

6.2. Anglian Water Services (AWS) have undertaken investigations to identify why the WRC is receiving excessive flows. They ~~found~~ concluded that due to its location and proximity to the Broads, the sewerage system in Horning has long had an issue with the ingress of water, either from groundwater infiltration, where water seeps into underground pipework, or from surface water from street drainage and similar, ~~or~~ and from fluvial water, when the Broads over tops into the streets of Horning and subsequently floods via manholes into the sewerage system. Investigations found that ground conditions in this area are the cause of structural failures of both the public sewerage network managed by Anglian Water and the further privately-owned drainage network, which when combined with the permanently high-water table results in a high level of groundwater infiltration. It should be noted that much of this excess surface water ingress is not intentionally connected but enters the system through defects and overland flooding.

6.3. For more details on these investigations and also the actions Anglian Water Services have undertaken, along with the commitment next steps, please see Appendix 2.

6.4. ~~In an attempt to alleviate flows getting into the sewerage system, in 2014/15 Anglian Water carried out camera surveys of all of its owned sewers and any that had shown to have groundwater ingress have been replaced or relined.~~

- ~~6.5. Out of the entire network of 9.5km, a total of 1.5km has been repaired and six manholes have been rebuilt and/or sealed against infiltration. While this work was successful in reducing the groundwater ingress into the sewerage network, this has not totally resolved the flow issues.~~
- ~~6.6. The Highways Authority (Norfolk County Council) have been working with Anglian Water, and are progressing the removal of two surface water drainage gullies from the Anglian water sewerage system.~~
- ~~6.7. Anglian Water are progressing the building of a hydraulic model to better understand the flow and capacity within the system. This is due for completion at the end of the 2016-17 financial year.~~
- ~~6.8. This scheme is ongoing and will inform further remedial works upon the network. A subsequent period of 12 months of monitoring of flows to assess the efficacy of the scheme and whether there is capacity to accept additional flows will be required by the Environment Agency.~~

7. Implications for Development in Horning

Whilst flows to the Water Recycling Centre remain high, measures to reduce existing flows and prevent additional flows to the catchment need to be taken. Development that could increase the flows to the Water Recycling Centre therefore needs to be avoided. All opportunities to prevent and reduce clean surface, ground or fluvial water entering the sewage system also need to be taken.

New developments or changes to existing properties (commercial or domestic) that could increase foul water flows to the Horning WRC will not be looked upon favourably by the EA ~~and LPAs, Anglian Water or the undersigned~~ until the excessive flows to the Centre have been addressed with confidence, or if further innovations in technology and permitting are introduced. ~~It is considered that 12 months worth of the continuously collected flow monitoring data from the WRC, will provide enough evidence to determine the effectiveness of each tranche of works upon the system, and allow review of the acceptability of development.~~

This means that there will be a presumption against developments that increase flows to the WRC ~~in the short term~~. Similarly, there will be a presumption against developments that rely upon stand-alone foul water treatment solutions in sewered areas as they too have the potential to adversely affect water quality and are not subject to the environmental monitoring of a regulated water company. Rules in respect of permitting stand-alone foul water treatment solutions can be found at the following link:

[General binding rules: small sewage discharge to a surface water - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

~~The capacity that the infiltration scheme will free up at the WRC is difficult to predict and so the quantum of development that will be able to come forward in the future is currently unknown.~~

We (LPA and Environment Agency) are keen to ensure the water infrastructure is adequately considered upfront without unduly blocking development, whilst continuing to safeguard Habitats Directive sites, and meet the objectives of the Water Framework Directive. AWS have committed to address a number of issues, as detailed in their Horning Statement of Fact (see Appendix 2) and are committed to discuss with the EA in seeking further possible interventions in order to regain WRC compliance and the operation of the public sewer network.

Developers will need to engage with relevant parties in order to identify and progress ~~solutions~~ possible interventions; indeed AWS, the LPAs and EA actively encourage pre-application discussions. Developers will need to engage with relevant parties in order to identify possible interventions that can ensure no potential net addition to foul water flows. AWS, the LPAs and EA encourage pre-application discussions.

We are committed to work with all parties to progress solutions to enable development in Horning.

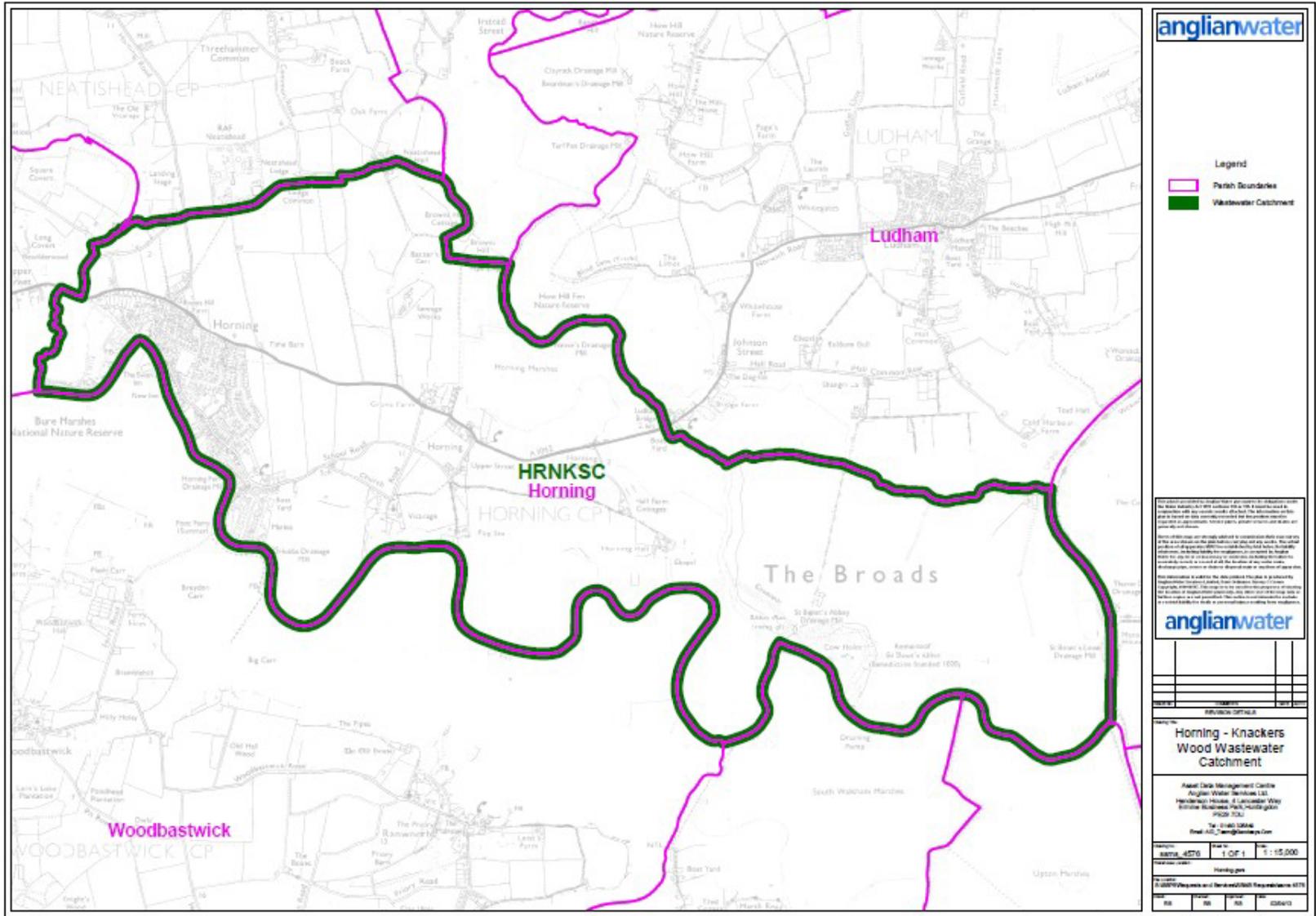
This position statement will be reviewed ~~after each tranche of works on the system, and again after the collection of 12 months post works data~~ every 12 months.

xxx
Jo Firth
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xxx
Russell Williams
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Broads Authority

Appendix 1: Horning Knackers Wood Water Recycling Centre Catchment



Appendix 2: Statement of Fact, Anglian Water Services, February 2022.

Weight to be given to the Emerging Local Plan	
Executive Summary	The purpose of this report is to consider what weight (if any) in the determination of Planning applications the Council may give to relevant policies of the emerging Local Plan ahead of examination in line with paragraph 48 of the National Planning Policy Framework
Options considered.	<ul style="list-style-type: none"> • Make recommendations to Cabinet to apply weight as detailed in Appendix 1 • Make recommendations to Cabinet to continue to rely on the 2008 Core Strategy and 2011 Site Allocations Development Plan Document and apply limited weight to the emerging Local Plan on a case-by-case basis. <ul style="list-style-type: none"> ○ Where specific policies of the emerging Plan have been relied upon by an applicant, recommend the continuation of the position that weight can only be given on a case-by-case basis having regard to paragraph 48 of the Framework and the level and nature of any objection.
Consultation(s)	The Local Plan has been subject to a number of external consultations in line with statutory requirements and been developed through collaborative internal engagement and Member steer through the Planning Policy & Built Heritage Working Party. Full Council authorisation for the submission of the Plan for independent examination was received on 1.3.23
Recommendations	<ul style="list-style-type: none"> • To recommend to Cabinet that: as soon as reasonably practical weight is given the emerging Plan policies in line with para 48 of the NPPF as detailed in appendix 1.
Reasons for recommendations	<p>The Local Plan is now at an advanced stage of production having been submitted for independent examination and updates many of the policies in the Development Plan to align with the more recent NPPF and corporate /national agenda.</p> <p>The NPPF advises that local planning authorities may give weight to relevant policies in emerging local plans according to:</p> <ul style="list-style-type: none"> a) <i>the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);</i> b) <i>the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the</i>

	<p><i>greater the weight that may be given); and</i></p> <p><i>c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).</i></p> <p><i>(para 48)</i></p>
Background papers	<p>Submission version of the Local Plan and all background papers and supporting evidence are published and available on the Councils new Local Plan examination Library Home Local Plan Examination (north-norfolk.gov.uk)</p>

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown: Portfolio Holder for Planning
Contact Officer	Iain Withington. Planning Policy Team leader

Links to key documents:	
Corporate Plan:	Production of the Local Plan is a cross cutting theme in regard delivery of the Corporate Plan's priorities.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Core Strategy and Site Allocations Development Plan Documents. Housing Strategy.

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	None

1. Purpose of the report

The purpose of this report is to seek authority to give weight in decision making to relevant policies of the emerging local plan in line with paragraph 48 of the National Planning Policy Framework, NPPF in advance of examination in public and adoption of the Plan.

2. Introduction & Background

- 2.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 the legislative provision when making decisions relating to planning applications requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.
- 2.2 For North Norfolk the Development Plan is the Core Strategy, 2008 and the Site Allocations Development Plan Document (DPD) 2011 which make up the Council's adopted Local Plan along with adopted neighbourhood plans of Corpusty & Saxthorpe, Ryburgh and Holt (Post Referendum Decision Statement expected to be issued 25.6.23 following Council endorsement of the referendum result) and the adopted Norfolk Minerals and Waste Framework. The adopted Design Guide Supplementary Planning Document (SPD) 2008, Landscape Character Assessment SPD 2021, and Landscape Sensitivity Assessment SPD 2021 provide additional guidance and are material considerations of weight.
- 2.3 The NPPF advises that local planning authorities may give weight to relevant policies in emerging local plans according to:
- a) *the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
 - b) *the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
 - c) *the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).*

Para 48

.....Due weight should be given to them, [policies] according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Para 219

In addition to the above the NPPF states that:

In the context of the Framework – and in particular the presumption in favour of sustainable development, arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) *the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and*

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.

Para 49.

2.2 Paragraph 50 goes on to state:

Refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination; or – in the case of a neighbourhood plan – before the end of the local planning authority publicity period on the draft plan. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.

2.3 To date only limited weight has been attributed to the emerging Local Plan as a whole. Advice has remained that relevant decision-making reports make reference to the emerging Plan depending on the circumstances of any relevant application and the degree of reliance on the emerging policies. Where specific policies have been relied upon by an applicant weight has only been given on a case-by-case basis having regard to paragraph 48 of the Framework and the level and nature of any objection. With the Plan now submitted for examination, Members have a choice in line with NPPF para 48 (a), to place greater emphasis on the emerging Plan and its individual policies in line with para 48 (b) and (c). or to continue to rely on the Core Strategy.

2.4 The emerging Local Plan was submitted to the Secretary of State on 11th May 2023 and the examination is expected to commence late Summer/ Autumn 2023. The Plan contains 50 policies and 28 site proposals and one overarching policy that seeks to allocate the sites. The Plan once adopted will replace the Core Strategy, 2008 and the Site Allocations DPD, 2011, and sets out the long-term vision and strategy for how our towns, villages and the countryside for North Norfolk will develop and evolve. In short, the Plan sets out the strategic planning framework with the land use policies and development proposals which provide the foundations to guide, support, and deliver sustainable and climate resilient development in North Norfolk through planning decisions over the next 20 years.

2.5 With its submission for independent examination the Plan is considered to be at an advance stage and has undergone Sustainability Appraisal and Habitat Regulation Assessment. It has followed a number of stages as set out in the regulations including consultation. It has been produced in collaboration with input from local communities, developers and guided by cross party Members through the Planning and Build Heritage Working Party. Many of the policies update the approaches in the Core Strategy and align with the overall Council's objectives of climate resilient sustainable development while being consistent with the NPPF. Some policies, however, are contested through the recent Regulation 19 consultation and in line with para 48 b) there remain unresolved objections. While some of these are judged to be of some significance and as such will need to be resolved through the examination others are seen as less significant comments / objections. Appendix 1 sets out the overarching summary of officer's assessments of the degree of

objection and its legal and soundness significance. Each is summarised below for consideration at the working party by Members.

- 2.6 Detailed assessment has been undertaken on the Plan's legal and soundness compliance through the utilisation of self-assessment legal and soundness check sheets developed by the Planning Advisory Service, PAS and which are part of the Council's Local Plan submission. These and all supporting documents can be seen in the published [examination library](#) [Document reference A11 and A12]. An assessment has also been done against the level and nature of objections and any unresolved issues that remain in order to inform this report.in line with para 48 of the framework.
- 2.7 It should be noted that this report solely addresses the scenario of applying weight to the emerging policies in addition to the consideration of the existing development plan. As outlined in para 2.3 this should be determined by applying the three tests in guidance. Applying weight to an emerging policy does not mean that an existing adopted policy is disregarded, indeed it remains the case that the decision maker is required to make the decision in accordance with the adopted development plan unless material considerations suggest otherwise. In effect for the duration of a transitional period regard, an appropriate weight, should be given to both existing and emerging policies.
- 2.8 A different decision-making approach is required when the most important policies for determining an application are deemed to be out of date. For example, when an authority is unable to show a five-year land supply its policies dealing with housing delivery will be out of date and in such a scenario the NPPF requires that applications are determined in accordance with the presumption in favour of sustainable development. This report does not seek to address these circumstances which will need to be considered on a case-by-case basis.

3. Proposals and Options

- 3.1 The Core Strategy was adopted in 2008 and followed by the Site Allocations DPD in 2011. The emerging Local Plan updates many of the policies and site allocations in relation to national policy changes and up to date evidence and is aligned with the more recent corporate and national emphasis on tackling climate change. With the Local Plan now submitted for examination applying weight in accordance with paragraph 48 of the NPPF at this stage as set out in Appendix 1 is seen as a practical transition step for the Council in order to start to place weight on relevant policies
- 3.2 The below, culminating with the summary in Appendix 1 briefly summarises the review of the policies and proposals contained in the Local Plan in relation to the requirements set out in paragraph 48 of the Framework and the emerging policies relationship with the adopted Core Strategy.
- 3.3 Policy CC1: Delivering climate resilient sustainable growth: This policy sets out the guiding principles that development proposals should address in order to ensure that new development positively contributes to mitigating and adapting to climate change and sets out the local parameters of sustainable development for North Norfolk. It brings together the principles of the Local Plan and reflects many of the Councils' corporate priorities. The policy

received no objections to the principles it contains and is considered to be strongly aligned to the Framework. In particular section 2 (paras 7-14) presumption in favour of sustainable development, but the approach also reflects the wider NPPF and in particular Section 14 with regard to climate resilience.

- 3.4 Policy CC2: Renewable Energy & low Carbon Energy. The policy sets out the approach to renewable and low carbon energy in order to positively increase the use and supply of renewable and low carbon energy. The approach also identifies broad areas suitable for potential onshore wind energy turbine development in line with the positive requirements of the NPPF (para. 158). In doing so, it utilises evidence within the adopted Landscape Sensitivity Assessment SPD, 2021. The approach received objections of some significance at Regulation 19, in relation to the policy being either too restrictive or not restrictive enough towards onshore wind energy development, the robustness of the wind energy map and the difference in identification of height for small, medium and large wind turbines. In response, a number of minor modifications have been proposed to add further clarity to the supporting text and wind energy map, which address a number of these concerns. However, there are outstanding matters, which are considered to be best resolved through examination.
- 3.5 Policy CC3: Sustainable Construction, Energy Efficiency & Carbon Reduction. Objections of some significance were received at Regulation 19 stage. The approach seeks the implementation of measures to reduce Co2 emissions in the design, construction and use of buildings and a local progression in standards to achieve carbon zero ready by 2035 in order to contribute to meeting the national 2050 net greenhouse gas emission reduction targets in a cost effective and practical in line with wider planning legislation. The approach outside building regulations is contested with the view that the move to carbon zero should be left to national policies and government. The approach aligns with the NPPF to a significant degree and the policy approach lays the foundations for the Governments Future Homes Standards likely to be introduced between 2022 and 2025. The approach is also aligned with the corporate direction for travel and wider climate change agenda. However there remain unresolved objections in relation to the principle of the policy and as such are considered best to be resolved through examination.
- 3.6 Policy CC4: Water Efficiency. The approach recognises that the District is identified as an area of water stress by the Environment Agency and evokes agreement 22 from the signed Norfolk Strategic Planning Framework which sets out the shared spatial objectives and Statement of Common ground in order for the Council to demonstrate compliance with the Duty to Co-operate requirements of Plan making in this area. The agreement obligates the Council to introduce a policy to conserve water by requiring residential development to meet the optional water use standard of 110litres.perperson/day, as set out in Building Regulations Part G2 2016. The cost and effect on plan wide viability in applying these higher standards is shown to have no impact on development viability. No objections were received on this policy at the Regulation 19 consultation. Aligns with the NPPF to a significant degree (various paras including 20 and 153)

- 3.7 Policy CC5: Coastal Change Management aims to reduce the risk from coastal change by managing the types of development in potential risk areas. The policy aligns to a significant degree with the NPPF (paras. 170 - 173) and is supported by the emerging joint Coastal Adaptation Supplementary Planning Document (SPD), which is nearing adoption following separate public consultation and is aligned to the guidance contained in the national Planning Practice Guidance, PPG. There was general support for the policy at Regulation 19. Representations raising concerns were largely confined to the policy requirement to submit supporting information to allow risk to be assessed by the Council rather than the substantive principle of the policy itself. e.g. one comment considered to be of limited significance requested greater flexibility for businesses that will have to carry out a staged rollback. This matter is addressed in greater detail in Policy CC6 Coastal Change Adaptation and further guidance will also be provided in the emerging SPD. The new Policy requires a Coastal Erosion Vulnerability Assessment, CEVA to be submitted in order for proposals to comply. The details of such a requirement are contained in PPG and detailed in the emerging Coastal SPD and the PPG
- 3.8 Policy CC6: Coastal Change Adaptation is to make policy provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas (CCMAs). The policy aligns to a significant degree with the NPPF (paras. 170 - 173) and will be supported by the emerging joint Coastal Adaptation SPD, which is nearing adoption and is aligned to the guidance contained in the national Planning Practice Guidance, PPG. There was general support for the policy at Regulation 19, with one comment considered to be of less significance, as mentioned above. The new Policy requires a CEVA to be submitted in order for proposals to comply.
- 3.9 Policy CC7: Flood Risk & Surface Water management. The policy is aligned with updated national flood risk approach and has been informed through dialogue with the Lead local Flood Authority. In addressing surface water flooding the approach seeks applicants to demonstrate application of the drainage hierarchy and evokes the most up to date guidance. No objections were received on this policy at the Regulation 19 consultation.
- 3.10 Policy CC8: Electric Vehicle Charging aims to promote and ensure delivery of appropriate electric vehicle charging infrastructure and to future-proof developments in the District. The policy ensures compliance with the NPPF (paras. 107(e), 110(a) and 112(e)) and aligns with national direction of travel and the Council's Corporate Plan and commitments within the Environmental Charter. There was general support for the policy at Regulation 19, with a small number of representations considered to be of less significance regarding deliverability, but also including requests to delete the policy and leave the matter of electric vehicle charging to Document S of the Building Regulations.
- 3.11 Policy CC9: Sustainable Transport seeks to ensure that new development maximises the opportunities for the use of sustainable forms of transport and that the public highway remains safe and convenient for all road users. The policy aligns to a significant degree with the NPPF (paras. 104 - 106). There were no significant objections to the policy at Regulation 19, with a small number of representations considered to be of less significance, some concerned about recognition of the existing pressure on the infrastructure.

- 3.12 Policy CC10: Biodiversity Net gain. The approach introduces the requirement for measurable biodiversity net gains envisaged by the Environment Act. The provisions of the Environment Act are expected to be brought into force in November 2023 ahead of Local Plan adoption and as such the policy sets the Council's approach and priorities on the minimum net gain to be achieved. The policy ensures that in securing net gain the Council's preferences through the mitigation hierarchy is prioritised leading to avoidance, mitigation (onsite) and compensation (off site). The approach aligns with corporate aspirations around climate change resilience and improvements to the wider quality of life. Although some objections were received at Regulation 19, these were considered to be of less significance, being largely connected to as yet unknown details of the Environment Act. In response, a number of minor modifications have been proposed to add further clarity to the supporting text and policy wording, as further details have become known. There does remain a level of uncertainty around the full details of the secondary legislation coming forward to support the Act and the level of in house resources to implement these changes. However officers understanding of the emerging secondary legislation is that the policy provides sufficient clarity and depth to align.
- 3.13 Policy CC11: Green Infrastructure aligns with the NPPF to a significant degree, (paras. 20, 92,179, 180, 186) provides an integrated approach with other policies in the Plan e.g. HC2/ENV5 which set out the required quantity, quality and accessibility of open space to the most up to date evidence base, standards already in use. ENV5 enacts the Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy into policy. This is a strategy that is already adopted and in use by the authority so that permissions granted meet the requirements of the conservation of Habitats and Species Regulation 2017 (as amended).
- 3.14 Policy CC12: Trees, Hedgerows & Woodland supports the retention and incorporation of existing and new trees within development proposals and the protection of trees, hedgerows, woodland and other natural features from loss, deterioration and harm, where compensatory replacement is provided where overriding benefits arising from a development outweigh the harm. The policy aligns to a significant degree with the NPPF (paras. 131, 174(b), 180(c)) and the Council's Corporate Plan, as well as its Environmental Charter. There is general support for the policy with a small number of representations considered of less significance relating to the perceived ambiguous terms of replacement planting. A small number of minor modifications have been presented for examination around wording clarification and future proofing the policy. These do not impact the intent of the policy.
- 3.15 Policy CC13: Protecting Environment Quality. The approach aligns with the NPPF to a significant degree (paras.174,185). A significant modification has been proposed to address the further requirement of Nutrient Neutrality which will need further consideration at the examination. The principle of the policy outside nutrient neutrality aligns strongly with the direction of travel nationally and the Council's aims and ambitions and also reflected in the existing adopted Core strategy policy EN13. There is general support for the policy at Regulation 19, with a small number of representations considered to be of less significance, which include a request for reference to The Broads in relation to dark skies. In response, a minor modification has been proposed to

strengthen the supporting text in this regard. Addressing nutrient neutrality is a legal requirement, it is unlawful for the Council to issue planning consent without addressing the issue and measures are underway separately to put in place the required mitigation in partnership with adjacent local authorities and Natural England. The policy modification with regards nutrient neutrality has not yet been subject to consultation and the approach is considered best to be resolved through examination.

- 3.16 Policy SS1 Spatial Strategy: Although the approach aligns with the NPPF to a significant degree (paras. 68-69, 79, 105, 106) there remain significant unresolved issues around the distribution of growth the approach to the small growth villages and the overall quantum of growth. It is considered that the approach is best resolved through examination.
- 3.17 Policy SS2: Development in the Countryside: The policy aligns with the NPPF to a significant degree and is a similar approach to the current Core Strategy policy SS2. However, the designation of the Countryside Policy Area relies on the establishment of the settlement hierarchy, the acceptance of the proposed spatial strategy set out in policy SS1, the proposed site allocations and the review of the relevant settlement boundaries to which there are multiple objections. It is considered that the approach is best resolved through examination.
- 3.18 Policy SS3: Community Led development. The policy aligns with the NPPF to a significant degree and sets a positive approach to the Council's support of community led development and the rural economy. The approach empowers communities to bring forward appropriate community led development outside neighbourhood planning and in particular that which provides affordable and key worker housing. The policy works on the basis of promoting the merits of community led growth as an exception. Where representations were received, they generally focused on the promotion of other sites and are seen as less significant comments in relation to para 48 and the substance of the policy. The policy was supported by Broadland Housing Association one of the main affordable housing associations operating in the District.
- 3.19 Policy HC1: Health & Wellbeing. The approach aligns with the NPPF to a significant degree. The policy is a new policy that evokes agreement no 18 from the signed Norfolk Strategic Planning Framework which sets out the shared spatial objectives and Statement of Common ground in order for the Council to demonstrate compliance with the Duty to Co-operate requirements of Plan making in this area. The policy formalises an approach that is already in place through the use of the engagement protocol between LPAs, Public Health and Health Sector organisations and ensures that matters relating to healthy environments are informed by the use of the Healthy Planning Checklist. The approach received no objections and two less significant comments which have resulted in a minor modification being proposed to address updated terminology.
- 3.20 Policy HC2: Provision & Retention of Open Space. The policy HC2 aligns with the NPPF to a significant degree and utilises the most up to date evidence on open space qualitative and quantitative assessments which already sits behind decision making for the open space requirements. The second half of the policy applies a degree of protection to designated open spaces similar to existing policy CT1. Such spaces were reviewed as part of the Local Plan process and have undergone consultation. It is considered that the principals

contained in the policy are not challenged however a number of specific site designations are.

- 3.21 Policy HC3: Provision and retention of Local Facilities. The purpose of the policy is to allow for new community facilities and services in sustainable locations and to help prevent any premature loss of important facilities. The approach is similar to the current approach in Core Strategy policy CT3, aligns with the NPPF and it is considered that the challenges put forward are less significant in nature. The application of the policy however is in relation to the selected settlements and countryside designation which have unresolved objections and there remains a relationship between contested policies elsewhere in its application. As such the policy application should remain through Core Strategy Policy CT3 at this time.
- 3.22 Policy HC4: Infrastructure Provision, Developer Contributions & Viability. The policy sets out the strategic approach to ensure that all of the social, physical and green infrastructure, which is necessary to make development acceptable in planning terms and meet the requirements of the Council's local definition of sustainable development is provided in a timely manner. There is high consistency with the NPPF and alignment with other strategies in the policy approach set. The policy is also more detailed and prescriptive than its predecessor in the Core Strategy (CT2). Although in the principle of the policy is not challenged – i.e. funding through developer contributions the more transparent and onerous aspects of the policy which set out compliance details are. The approach is supported by an up-to-date plan wide viability assessment and the policy requires its use. Utilisation of the viability principles and approach as set out in the policy will go to increasing the transparency of proposals and assist in the council in seeking policy compliant planning gain. Elements of the Council's viability approach however are challenged and as such there remain unresolved issues.
- 3.23 Policy HC5 & HC6 Fibre to the Premises and Telecommunications Infrastructure. Both policies are considered to offer a high degree of compliance with the NPPF. Paragraph 34 specifically encourages LPA's to set out the contributions from developers for all types of infrastructure including digital infrastructure. The policies received very little representation at Regulation 19 consultation. One respondent sought the removal of the HC5 requirement and reliance on future building regulation whilst another sought the AONB to be exempt from all telecommunications. Both are considered to be less significant objections. The approach is also aligned with corporate and county wide goals of improving digital access.
- 3.24 Policy HC7: Parking Provision aims to ensure that adequate vehicle and cycle parking is provided within developments. The policy aligns to a significant degree with the NPPF (paras. 107-108). There were no significant objections to the policy at Regulation 19, with a very small number of representations considered to be of less significance concerned about existing parking pressures and that the parking standards should be sought as a minimum. A minor modification has been proposed to bring the policy wording up-to-date in relation to the Norfolk County Council Parking Guidelines (Revised July 2022). Use of the emerging Local Plan policy would ensure Appendix C of the Core Strategy which is based on superseded parking standards is no longer used and the approach reflects and aligns with the more recent standards.

- 3.25 Policy HC8: Safeguarding Land for Sustainable Transport aligns to a significant degree with the NPPF (paras. 104 – 106, 110). There were no significant objections to the policy at Regulation 19. One request for inclusion of an additional track bed between Walsingham and Wells-next-the-Sea, has been identified as strategic by Norfolk County Council. This has subsequently been included as a local consideration by the town council in the emerging Wells-next- the-Sea Neighbourhood Plan.
- 3.26 Policy ENV1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads. The purpose of the policy is to ensure that the statutory duty and appropriate high level of protection is given to these designated landscapes. The approach aligns with the NPPF to a significant degree and updates the current adopted Core strategy policy EN1 with reference to the more recent NPPF requirements and the consideration of the 2021 adopted Landscape Character SPD. The specific policy addresses the environmental considerations and seeks to ensure the distinctive qualities of the varied landscape character areas, their key characteristics and valued features and the historic and cultural environment are taken into account in any proposals irrespective of the level of need. The policy also sets the parameters for decision making and guides applicants to the level of information and detail now required to aid decision making on proposals in sensitive landscapes.
- 3.27 Although there are objections to the policy, they focused on seeking even higher levels of protection and restricting growth to only meet identified local need. Policy SS1 sets out the approach and distribution of growth and it is under this policy that such issues will need to be explored at EIP. It is considered that these are less significant comments in relation to Paragraph 48.
- 3.28 Policy ENV2: Protection & Enhancement of the Landscape & Settlement Character. The purpose of the policy is to ensure that development proposals reflect the defining features and distinctive qualities of the varied landscape character areas, their key characteristics and valued features and the valued features and character, appearance and integrity of the historic and cultural environment of North Norfolk. In doing so the approach further evokes the use of the Council's Landscape Character Assessment and Landscape Sensitivity Assessments SPDs. The approach aligns with the NPPF to a significant degree; however, a number of developers have challenged aspects of the policy. In particular the requirement to consider the cumulative impacts of a proposal on the landscape and settlement character is challenged. This however is in line with national policy and guidance where the PPG states that "*cumulative impacts of development on the landscape need to be considered carefully*"¹ The Council at the request of this working party have also put forward a modification for consideration at the EIP which seeks to increase the degree of certainty that the policy requirements will be used to inform proposals and the relevant information be made available for decision making. It is considered that this will need to be resolved through the examination however that weight should be applied to the submitted policy approach at this stage as the issues raised are primarily about the mechanisms of the policy rather than the principle or substance.
- 3.29 Policy ENV3: Heritage & Undeveloped Coast aims to protect the appearance and character of the coast. The policy aligns to a significant degree with the

¹ [PPG Paragraph: 036 Reference ID: 8-036-2019072, Revision date:21.7.2019](#)

NPPF (paras. 174). No representations or objections were received regarding the policy at Regulation 19. However, a minor modification has been proposed by the Council, in order to make reference to locations outside Selected Settlements as identified in Policy SS1. This is seen as a clarification in order to make the intention of the approach clearer and does not change the substance of the policy.

- 3.30 Policy ENV4: Biodiversity & Geodiversity aims to protect and enhance biodiversity and geodiversity in the District. The policy aligns to a significant degree with the NPPF (paras. 179-182). There was general support for the policy at Regulation 19, with a small number of representations considered to be of less significance, including a request to make reference to available data about County Wildlife Sites within the supporting text, which has been proposed as a minor modification.
- 3.31 Policy ENV5: Impacts on International & European site: Recreational Impact & Mitigation Strategy. The main purpose of the policy is to ensure compliance with the Conservation of Habitats and Species Regulations 2017 (as amended). The approach aligns with the NPPF to a significant degree and brings into policy the requirement to contribute to strategic mitigation measures to avoid adverse effects on the integrity of Habitats Sites arising from recreational effects. Strategic mitigation is through the Norfolk Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy, GIRAMS. Compliance with the Conservation of Habitats Regulation is a legal obligation on the Council without which permission could not be legally issued. The approach received some less significant comment at the regulation 19 consultation. The strategy is already in place having been implemented across Norfolk on 31.3.2022.
- 3.32 Policy ENV6: Protection of Amenity aims to maintain, protect and promote adequate living and working conditions in order to ensure all occupants benefit from a good standard of amenity. The policy aligns to a significant degree with the NPPF (130(f), 185 and 187). There is general support for the policy at Regulation 19, with one representation considered to be of less significance relating to dark skies, which is considered to be robustly addressed in a number of policies of the Plan.
- 3.33 Policy ENV7: Protecting & Enhancing the Historic Environment aims to conserve and where possible, enhance the historic environment of the District. The policy aligns strongly to the NPPF (paras. 189-208). There was overall support for the policy at Regulation 19, with no significant challenges. Historic England sought the reformatting of the policy wording. Where considered necessary such clarifications have been proposed as minor modifications to the policy and which form part of the content of a Statement of Common Ground being prepared with Historic England. These changes would not affect the principle of the policy just its presentation.
- 3.34 Policy ENV8: High Quality Design seeks to provide a set of design principles that will result in improved design and ensure that the special character and qualities of North Norfolk are maintained and enhanced. The policy aligns to a significant degree with the NPPF (paras. 126-136), and the principles of the National Design Guide. There was general support for the policy at Regulation 19, with a number of representations received considered to be of less significance concerned with elements of the policy wording being too prescriptive, where it was concluded that diluting the wording would run

contrary to the important planning objective of the policy. The policy is designed to be used in conjunction with the Council's Design Guide SPD and successors.

- 3.35 Policy HOU1: Delivering sufficient homes, sets a minimum housing target for the District to ensure that all existing and future housing needs are addressed in locations that comply with the Settlement Hierarchy in Policy SS 1 'Spatial Strategy' (significant unresolved issues around the approach under SS1 remain). Although the policy aligns with the NPPF to a significant degree (paras. 60 - 67), objections of some significance were received at Regulation 19, in relation to windfall allowance, both too much and too little; objections and support for the approach to setting the housing target, concern that the plan will not deliver the required level of housing, particularly in the short to medium term and concern that the plan period is not consistent with national policy.
- 3.36 Policy HOU2: Delivering the right mix of homes, seeks to ensure that the type, size and tenure of homes provided closely matches the existing and predicted future needs of the local population. Although the policy aligns with the NPPF to a significant degree (paras. 20, Section 5; 60 - 67), objections of some significance were received at Regulation 19, these were mainly focused on the prescriptive nature of the policy and perceived impact on viability. Concerns were also raised that the percentage of affordable homes should be subject to scheme viability, that not all costs faced by developers have been included in the viability assessment and that the requirement for the provision of such a specific mix is unnecessarily prescriptive and inflexible.
- 3.37 Policy HOU3: Affordable homes in the countryside, aims to provide for the delivery of an increased supply of affordable homes in locations close to where the need for such accommodation arises. This policy aligns with the NPPF to a significant degree (paras. 78-80). There is support for the policy, which updates the current Core Strategy approach to ensure alignment with the NPPF. A small number of representations were received which are considered to be less significant comments regarding ability to deliver affordable homes for local benefit and which do not challenge the principle or substance of the approach. The policy is aligned to the Corporate Plan objectives. There remains a relationship with contested policies in its application to the revised countryside policy area however it is considered appropriate to apply the revised policy criteria set out in the policy but only in relation to the existing designated Countryside Policy Area (Given that the extent of the emerging and revised Countryside Policy Areas is challenged through objections raised through SS2).
- 3.38 Policy HOU4: Essential rural worker accommodation, seeks to meet the need for essential accommodation associated with the use of land for agriculture, forestry and other rural based businesses in locations that would otherwise be judged as unsustainable. This policy aligns with the NPPF to a significant degree (para. 80). No objections were received on this policy at the Regulation 19 consultation. A minor modification to the wording of the policy in the interest of clarification has been proposed by NNDC. There remains a relationship with contested policies in its application to the revised countryside policy area however it is considered appropriate to apply the revised policy criteria set out in the policy but only in relation to the existing designated Countryside Policy Area (Given that the extent of the emerging and revised Countryside Policy Area is challenged through objections raised through SS2).

- 3.39 Policy HOU5: Gypsy, Traveller & Travelling Showpeople's Accommodation, seeks to meet the needs for both permanently occupied and transit pitches for the gypsy and traveller communities. This policy aligns with the NPPF (paras. 62, 74) and the Planning Policy for Traveller Sites 2015 to a significant degree and is linked to policy SS2. The approach received some less significant comments but also more significant objections relating to the strength of protection for the surrounding landscape and concern that the policy does not make specific reference to the level of objectively assessed need and then allocate accordingly. The approach is largely a continuation of that used in Core Strategy Policy H04 and is seen as appropriate due to the low level of identified need, however the principal approach will need to be resolved through examination.
- 3.40 Policy HOU6: Replacement dwellings, extensions, domestic outbuildings and annexed accommodation, seeks to manage the visual impacts of these forms of development on the character of the District. This policy links to Policy ENV8 (High Quality Design) and aligns to a significant degree with the NPPF (paras. 126 - 136). A few representations were received at Regulation 19 largely concerned with elements of the wording being too subjective. However, these are matters of planning judgement by the decision maker.
- 3.41 Policy HOU7: Re-use of rural buildings in the countryside, is intended to allow for the conversion and re-use of good quality, structurally sound buildings in ways which respects character and protects wildlife. Aligns with multiple sections of NPPF, inc. design, heritage, landscape etc. The approach received some less significant comments and objections which include suggestion that that the policy is unreasonable in amount and type of criteria to be met and exceeds what national policy requires. In response, a minor modification has been proposed for reasons of clarification, to ensure policy requirements are proportionate and reasonable, such that the policy would require 'a substantial proportion' of structural elements to be retained rather than 'all structural elements'. This would address one of the concerns. Nevertheless, there are outstanding matters to be addressed through examination.
- 3.42 Policy HOU8: Accessible & Adaptable Homes. The policy evokes the optional national standards set out through Building Regulations in order to ensure new homes address the District's needs partly in relation to the ageing population but also to address historical deficiencies and align with strategies to positively address health and welfare issues. The approach aligns with the NPPF in so far as strategic policies should establish the amount of housing to be planned for and reflect in policies the size, type and tenure required for different groups. Planning policies and decisions should also ensure development create inclusive and accessible developments which promote health and wellbeing and do not undermine the quality of life or community cohesion. The approach also supports a number of corporate priorities. It is considered that this principle is generally supported in representations but that the justification is challenged by a number of developers as is the requirement to provide compliance information in an easy and transparent way at the time of decision making. As such there remain unresolved objections.
- 3.43 Policy HOU9: Minimum space standards. The policy evokes the optional nationally described space standards and sets out the minimum requirements

for gross internal floor area of new dwellings at a defined level of occupancy as well as floor area and dimensions for key parts of the home e.g. bedrooms, storage and floor to ceiling height. The approach complements policy HOU9 and brings cross benefits in terms of design and costs. As with policy HOU8 it aligns with the requirements of the NPPF and complements a number of corporate priorities. The approach and the justification for it is challenged with objections of some significance which will need to be resolved through examination.

- 3.44 Policy E1: Employment Land, seeks to ensure that a sufficient quantity of land is reserved for employment generating developments across the District. This policy is considered to align with the NPPF (para. 8, Section 6). However, the approach received objections of some significance at Regulation 19 requesting more allocations and the acceptance for mixed use development on employment land. A minor modification has been proposed in relation to correcting some of the numbers of hectares proposed following identification of a minor error and the removal of the proposed allocation (H27/1) at Holt. However, there remains unresolved objection to the strategic approach put forward which will need to be resolved through examination.
- 3.45 Policy E2: Employment Areas, Enterprise Zones & Former Airbases, is intended to ensure that designated employment land within the District is protected for employment uses. This policy aligns with the NPPF (para. 8, Section 6). The strategic approach received objections of some significance in relation to being considered too constraining with particular concern that the policy does not support mixed use developments which include housing.
- 3.46 Policy E3: Employment Development Outside of Employment Areas seeks to provide opportunities for businesses situated outside of designated Employment Areas with the potential to expand and thrive and to recognise the importance of employment outside the designated Employment Areas to the wider economy by requiring such uses to be retained where possible. The policy aligns with the NPPF to a significant degree (paras. 84-85). The approach received some less significant comment largely seeking clarity in relation to the principle of support for the expansion of existing businesses. Minor modifications are however proposed to the wording of the policy and within the purpose and preamble of the policy to this effect in order to better reflect the intention of the policy. These will need to be considered further through examination.
- 3.47 Policy E4: Retail and Town centre Development. The policy sets the approach to retail development across the District adding local detail to the national sequential tests, setting a local retail hierarchy, setting locally derived impact thresholds in relation to the available expenditure to support new retail proposals and identifies revised town centre and primary shopping areas. The approach aligns with the NPPF to a significant degree, (paras. 86-91). The approach received little commentary at Regulation 19 stage and no objections.
- 3.48 Policy E5: Signage and Shopfronts seeks to ensure the avoidance of the proliferation of advertisements in sensitive locations where it is considered that the amenity of the locality would be impaired and to ensure that new and replacement shopfronts are well designed to reflect the character of the surrounding area and enhance the visual amenity of the local area. The policy

aligns with the NPPF (para. 136). The approach received no commentary at Regulation 19 and no objections.

- 3.49 Policy E6: New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites seeks to ensure that new-build tourist accommodation, static holiday caravans and holiday lodges are located in appropriate locations and to allow flexibility for existing businesses within the countryside the opportunity to expand where appropriate. The policy aligns with the NPPF (paras. 84-85). The approach attracted objections of some significance from a number of developers at Regulation 19. In particular, the concerns raise that the policy is unduly onerous and restrictive in the limits it imposes on the type of development permitted and within which locations such development would be deemed acceptable. Although some minor modifications have been proposed in the interest of clarity, unresolved issues remain.
- 3.50 Policy E7: Touring Caravan & Camping Sites seeks to ensure that the use of land for touring caravan and camping sites is in appropriate locations. The policy aligns with the NPPF (paras. 81, 83-85). The policy attracted some support and less significant comments which suggested that explicit reference could be made to rural conservation areas and the setting of the Broads Authority as well as cross references to other policies such as the consideration of recreational disturbance. A modification is proposed to the supporting text only detailing links to ENV5 and the consideration of Recreational Impacts.
- 3.51 Policy E8: New Tourist Attractions & Extensions seeks to ensure that tourist attractions that broaden the tourism opportunities across the District and extend the tourist season are encouraged in appropriate locations. The policy aligns with the NPPF (paras. 84-85). Although the approach attracted some supporting comments, it also attracted objections of some significance from a number of developers at Regulation 19. In particular, the concerns raise that the policy is unduly onerous and inconsistent with national policy in relation to development in the AONB. These issues will need to be resolved through examination.
- 3.52 Policy E9: Retaining an Adequate Supply & Mix of Tourist Accommodation seeks to retain a mix of all types of tourist accommodation, where a building is currently being used for holiday purposes unless it is clear that there is an adequate supply of similar accommodation nearby. This is because of the critical role that such accommodation plays in supporting the District's economy. The policy aligns with the NPPF (paras. 84-85). The approach received very little representation at Regulation 19. One respondent sought more specific instruction about where replacement accommodation should be allowed and more flexibility about the use moving away from tourist accommodation. Two respondents objected to the principle of the policy on the basis that the high level of holiday let accommodation drives up prices such that local people are priced out of the market. These are considered to be less significant objections.
- 3.53 Policy DS1: Development Sites Allocation. Overarching policy DS1 allocates the 28 site proposals while the individual site policies provide the specific local detail. A number of these sites and the detailed allocation requirements are objected to, as is the housing requirement and parts of the overall spatial strategy. In some locations alternatives continue to be promoted. It is

considered that collectively there are unresolved objections along with those in relation to the spatial strategy and overall housing requirement which will need to be resolved through the EIP.

3.54 The Council however is not in a position to demonstrate a 5YHLS and as such the presumption in favour of sustainable development through NPPF para 14 is evoked. Given the Plan represents the Council's view of sustainable development (policy CC1) consideration could be given to the emerging Plan's proposed sites in the first instance in determining the presumption in favour of sustainable development. Similarly, where an applicant is reliant on the site being a proposed allocation for their justification as a departure from the adopted Development Plan then it is considered that it is reasonable that they should also be prepared to meet the specific policy requirements that accompany the individual site allocations and the emerging plan as a whole. In such circumstances at decision making weight to the relevant strategic policies in accordance with the recommendations set out in appendix 1 and the site-specific requirements should be applied

3.55 **As an alternative there remains the option to continue to give limited weight to the policies of the emerging Plan at this time and for the Council to continue to rely on the 2008 Core Strategy and 2011 Site Specific DPD until such time as the Plan has undergone examination and is adopted by the Council.**

3.56 If members are minded in taking this approach rather than the recommendation of applying weight as set out in appendix 1 it is asked that the working party recommend to cabinet that the Council:

takes no action at this time and continues to rely on the 2008 Core Strategy and 2011 Site Allocations Development Plan Document and apply limited weight to the emerging Local Plan on a case-by-case basis.

3.57 In doing so and the uncertainty around the timeline it is considered that this would represent a missed opportunity to ensure development proposals reflect the most up to date definition of sustainable development as envisaged by the Council.

3.58 In such a scenario and in relation to the case where individual proposals rely on a policy or policies contained in the emerging Local Plan the Council will continue to be only able to apply limited weight on a case-by-case basis having regard to paragraph 48 of the Framework and the level and nature of any objection.

4. Corporate Priorities

4.1 At the time of writing the Council was reviewing its corporate priorities. This report is aligned to the 2019- 2023 published version.

4.2 Production of the Local Plan is a cross cutting theme in regard the delivery of corporate priorities around Boosting Business sustainability and growth, adaptation to climate, Coast and the Environment, improvements to the Quality of Life and people's wellbeing.

5. Financial and Resource Implications

- 5.1 There are no budget implications however the advancement of the Local Plan policies as a decision-making consideration may bring forward the need for more urgent officer and Member training. However, this requirement would remain in any case upon adoption and applying weight in any transitional way would have resource implications initially though would also spread the requirement out over a longer time.

6. Legal Implications

- 6.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches The Plan must be justified and underpinned by up to date and proportionate evidence, be informed by appropriate sustainability appraisals and take account of and demonstrate how public feedback, national policy & guidance have been used to inform the production through the application of a consistent methodology.
- 6.2 The statutory process requires plan production to accord to the statutory requirements as set out in The Town and Country Planning (Local Planning), (England) Regulations 2012 (as amended). Failure to undertake Plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

7. Risks

- 7.1 There remains a residual risk of the Plan being modified through the Examination in Public process and through the requirements of further planning reform which, could undermine the production of the Plan to date. For example, further changes to the National Planning Policy Framework, NPPF, are expected later in the summer and the Levelling Up and Regeneration Bill, LURB, is currently in its final stages in the houses of parliament. Both the examination and changes in national policy could bring change either through incremental changes or substantive changes leading to wholesale replacement. However, the risks would apply to both the existing adopted plan and the emerging Plan. The submission of the Plan reduces the risks associated with changes in government policy and puts the authority in a stronger position to take advantage of any subsequent transitional arrangements should they be introduced.
- 7.2 If weight is not applied until later stages there is a risk of substantial time, and costs implications along with increased pressure and challenge on the continued use of existing adopted policies which will require resource.
- 7.3 Resource implications: Members may want to consider the timing of any implementation of emerging Local Plan policy weight and any requirement to upskill the wider department and members as appropriate. The emerging Plan through was published in January 2022 over 18 months ago and its development has involved formal and informal input from development management colleagues as well as significant Member input. The Plan has been guided by Members through the PPBHWP since its inception and has been debated at full council. As such decision makers will be familiar with the Plans contents, intentions and the Council's corporate priorities. Nevertheless there will be a period required in order to bring in any agreed.

7.4 A failure to give weight to the Plans proposed sites could have the potential to undermine the emerging plan in relation to major sites if alternative sites are brought forward.

7.5 There is the residual risk of having to defend any challenge ahead of examination.

8. Net Zero Target

8.1. The Local Plan sites outside the Council's Net Zero 2030 Strategy which is in relation to the Council's own approach to carbon reduction and which seeks to set an example and achieve earlier compliance. The Local plan is aligned to the national approach as set out through legislation to achieve the wider ambition of carbon zero ready by 2035 and contribute to meeting the national 2050 net greenhouse gas emission reduction targets in a cost effective and practical way. The Plan does seek a progressive approach by setting the policy requirements of CC3 Sustainable construction, Energy Efficiency & Carbon Reduction as a minimum. In time those, minimums will rise as costs come down and technical advances come forward and work practices change.

9. Equality, Diversity & Inclusion

9.1 As a legal requirement and test the Local Plan has undergone its own Equality Impact Assessment (EqIA) which can be found in the examination Library, Document Reference A7

10. Community Safety issues

N/A

11. Conclusion and Recommendations

11.1 The recommended option is for weight to be attached to the emerging Local Plan as outlined in appendix 1 however there is an alternative option around taking no action at this time and continuing to rely on the existing adopted development plan.

Recommendation

To recommend to Cabinet that;

as soon as soon as reasonably practical weight is given the emerging Plan policies in line with para 48 of the NPPF as detailed in appendix 1.

Attached
Appendix 1: Proposed Policy Weight Review - PPBHWP

Appendix 1: Proposed Policy Weight Review - PPBHWP

Policy	Policy title	Level of Objection	Core Strategy Policy Comparison	Degree of consistency NPPF	Proposed Weight
Climate Change Policies					
CC1	Delivering Climate Resilient Sustainable Growth.	No objection (principle)	NEW	CONSISTENCY: CC1 aligns with the NPPF to a significant degree- Section 2 (paras 7-14) presumption in favour of sustainable development, but also reflects the wider NPPF and in particular Section 14 with regard to climate resilience. Provides a local definition / interpretation to sustainable development	Significant weight
CC2	Renewable and Low Carbon Energy	Objections of some significance	SS 4 (part), EN 7	CONSISTENCY: CC2 aligns with the NPPF to a significant degree, being positively prepared – Section 14 (paras 152-158). Adopted LSA can already be used to assess suitability of any site proposed. Part 3 of the new policy includes a map that details suitable areas for wind energy (from small to large scale development), based on the LSA information and picks up on Footnote 54 of NPPF, requiring demonstration that planning impacts identified by local community have been addressed.	No weight
CC3	Sustainable Construction, Energy Efficiency & Carbon Reduction	Objections of some significance	EN6	CONSISTENCY: CC3 aligns with the NPPF to a significant degree and the policy approach lays foundations for the Governments Future Homes Standards likely to	No weight

				be introduced between 2022 and 2025. Note building regulation changes as well	
CC4	Water Efficiency	No objection	EN 6 (water efficiency as part of Code for Sustainable Homes).	CONSISTENCY: CC4 aligns with the NPPF to a significant degree (various paras including 20 and 153) and requires development to meet or exceed Building Regs Part G2 higher water use standard	Significant weight
CC5	Coastal Change Management	Less significant comment/objection	EN 11	CONSISTENCY: CC5 aligns with the NPPF to a significant degree, Section 14 (paras 170-173).	Significant weight
CC6	Coastal Change Adaptation	Less significant comment/objection	EN 12	CONSISTENCY: CC6 aligns with the NPPF to a significant degree, Section 14 (paras 170-173).	Significant weight
CC7	Flood Risk & Service water Drainage	No objection	EN10	CONSISTENCY: CC7 aligns with the NPPF to a significant degree, Section 14 (paras 159-169).	Significant weight
CC8	Electric Vehicle Charging	Less significant comment/objection	New	CONSISTENCY: CC8 aligns with the NPPF (para. 110a)) in relation to sustainable transport by encouraging the use of ultra-low and zero emission vehicles by ensuring a proportionate charging infrastructure is provided in new development	Significant weight
CC9	Sustainable Transport	Less significant comment/objection	SS 6 (part) CT 5	CONSISTENCY: CC9 aligns with the NPPF to a significant degree, Section 9 (paras. 104-106).	Significant weight
CC10	Biodiversity Net Gain	Less significant comment/objection	New	CONSISTENCY: CC10 aligns with the NPPF to a significant degree, Section 15 (in particular paras. 179-180).	Significant weight
CC11	Green Infrastructure	Less significant	SS 4, EN 9 (part)	CONSISTENCY: CC11 aligns with the NPPF to a	Significant weight

		comment/ objection		significant degree, (paras. 20, 92,179, 180, 186)	
CC12	Trees, Hedgerows & Woodland	Less significant comment/ objection	EN 4 (part)	CONSISTENCY: CC12 aligns with the NPPF to a significant degree (paras. 131, 174).	Significant weight
CC13	Protecting Environmental Quality	Less significant comment/ objection. Modification proposed	SS4 (part) EN 13	CONSISTENCY: CC13 aligns with the NPPF to a significant degree (paras. 174, 185).	No weight
Spatial Strategy					
SS1	Spatial Strategy	Objections of some significance	SS 1, SS 3	CONSISTENCY: SS1 aligns with the NPPF to a significant degree (paras. 68-69, 79).105/ 106	No weight
SS2	Development in the Countryside	Less significant comment/ objection. Relationship with contested policies	SS 2	CONSISTENCY: SS2 aligns with the NPPF to a significant degree (paras. 78-79, 84-85).	No weight
SS3	Community-Led Development	<i>Less significant comment / objection</i>	NEW	CONSISTENCY: SS3 aligns with the NPPF to a significant degree (paras. 28, 40, 52, 84-85, 93, 123).	Significant weight
Delivering Well Connected, Healthy Communities					
HC1	Health & Wellbeing	No objection	NEW	CONSISTENCY: HC1 aligns with the NPPF to a significant degree, Section 8 (paras. 92-93, 96).	Significant weight
HC2	Provision & Retention of Open Spaces	No objection (principle), Less significant comment/ objection in relation to a number of proposed designations	CT 1	CONSISTENCY: HC2 aligns with the NPPF to a significant degree, (paras. 93, 98-99, 123).	Significant weight
HC3	Provision & Retention of Local Facilities	Less significant comment / objection.	CT 3	CONSISTENCY: HC3 aligns with the NPPF to a significant degree (paras. 28, 93).	No weight

		Relationship with contested policies			
HC4	Infrastructure Provision, Developer Contributions & Viability	Less significant comment / objection	CT 2	CONSISTENCY: HC4 aligns with the NPPF to a significant degree, (paras.58, 124).	No weight
HC5	Fibre to The Premises	Less significant comment / objection	NEW	CONSISTENCY: HC5 aligns with the NPPF to a significant degree (para. 114).	Significant weight
HC6	Telecommunications Infrastructure	Less significant comment / objection	CT 4	CONSISTENCY: HC6 aligns with the NPPF to a significant degree (paras. 114-118).	Significant weight
HC7	Parking Provision	Less significant comment/ objection	EC 6, CT 6	CONSISTENCY: HC7 aligns with the NPPF to a significant degree, (paras. 107-108).	Significant weight
HC8	Safeguarding Land for Sustainable Transport	Less significant comment	CT 7	CONSISTENCY: HC8 aligns with the NPPF to a significant degree,	Significant weight
Environment					
ENV1	Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Less significant comment / objection	EN 1	CONSISTENCY: ENV1 aligns with the NPPF to a significant degree, Section 15 (paras. 174-177).	Significant weight
ENV2	Protection & Enhancement of Landscape & Settlement Character	Less significant comment / objection	EN 2	CONSISTENCY: ENV2 aligns with the NPPF to a significant degree, (paras. 130, 174-177).	Significant weight
ENV3	Heritage & Undeveloped Coast	No objection	EN 3	CONSISTENCY: ENV3 aligns with the NPPF to a significant degree, (para. 178).	Significant weight
ENV4	Biodiversity & Geodiversity	Less significant comment/ objection	EN 9	CONSISTENCY: ENV4 aligns with the NPPF to a significant degree, Section 15 (paras.174-175, 179-182).	Significant weight
ENV5	Impacts on international & European	Less significant comment/	NEW	CONSISTENCY: ENV5 aligns with the NPPF to a significant degree (paras.	Significant weight

	sites, Recreational Impact Avoidance Mitigation Strategy	objection		175, 179). Main purpose of policy is to ensure compliance with the Conservation of Habitats and Species Regulations 2017.	
ENV6	Protection of Amenity	Less significant comment	EN 4 (part)	CONSISTENCY: ENV6 aligns with the NPPF to a significant degree (paras. 130, 185, 187).	Significant weight
ENV7	Protecting & Enhancing the Historic Environment	Less significant comment	EN 8	CONSISTENCY: ENV7 aligns with the NPPF to a significant degree, Section 16 (paras. 190-208).	Significant weight
ENV8	High Quality Design	Less significant comment	EN 4	CONSISTENCY: ENV8 aligns with the NPPF to a significant degree, Section 12 (paras. 127-136).	Significant weight
Housing					
HOU1	Delivering Sufficient Homes	Objections of some significance	SS 3	CONSISTENCY: HOU1 aligns with the NPPF to a significant degree, Section 5 (paras. 60-67).	No weight
HOU2	Delivering the Right Mix of Homes	Objections of some significance	HO 1, HO 2	CONSISTENCY: HOU2 aligns with the NPPF to a significant degree, (paras. 20, Section 5; 60-67).	No weight
HOU3	Affordable Homes in the Countryside (Rural Exceptions Housing)	Less significant comment / objection. Relationship with contested policies (Countryside Policy Area)	HO 3	CONSISTENCY: HOU3 aligns with the NPPF to a significant degree, (paras. 78-80)	Limited weight (Partial)
HOU4	Essential Rural Worker Accommodation	No objection. Relationship with contested policies (Countryside Policy Area)	HO 5	CONSISTENCY: HOU4 aligns with the NPPF to a significant degree, (para. 80).	Limited weight (Partial)

HOU5	Gypsy, Traveller & Travelling Showpeople's Accommodation	Less significant comment / objection	HO 4	CONSISTENCY: HOU5 aligns with the NPPF to a significant degree (paras. 62, 74).	No weight
HOU6	Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Less significant comment / objection	HO 8	CONSISTENCY: HOU6 rolls forward HO 8 and extends the policy to cover outbuildings and annexes – links to design policy ENV8 and its relevant NPPF paras.	Significant weight
HOU7	Re-use of Rural Buildings in the Countryside	Less significant comment / objection	HO 9	CONSISTENCY: HOU7 rolls forward HO 9 and extends criteria. Aligns with multiple sections of NPPF, inc. design, heritage, landscape etc.	No weight
HOU8	Accessible & Adaptable Homes	Objections of some significance (justification)	EN 4 (part)	CONSISTENCY: HOU8 aligns with the NPPF (paras. 62, 130).	No weight
HOU9	Minimum Space Standards	Objections of some significance (justification only)	NEW	CONSISTENCY: HOU9 aligns with the NPPF (para. 130).	No weight
Economy					
E1	Employment Land	Objections of some significance	SS 5	CONSISTENCY: E1 aligns with the NPPF (para. 8, Section 6).	No weight
E2	Employment Areas, Enterprise Zones & Former Airbases	Objections of some significance	SS 5, EC 4	CONSISTENCY: E2 aligns with the NPPF (para. 8, Section 6)	No weight
E3	Employment Development Outside of Employment Areas	Less significant comment / objection	EC 2, EC 3	CONSISTENCY: E3 aligns with the NPPF to a significant degree (paras.84-85).	No weight
E4	Retail & Town Centre Development	No objection	EC 5	CONSISTENCY: E4 aligns with the NPPF to a significant degree, Section 7 (paras. 86-91).	No weight

E5	Signage & Shopfronts	No objection	NEW	CONSISTENCY: E5 aligns with the NPPF (para. 136).	Significant weight
E6	New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Objections of some significance	EC 7	CONSISTENCY: E6 aligns with the NPPF (paras. 84-85).	No weight
E7	Touring Caravan & Camping Sites	Less significant comment	EC 10	CONSISTENCY: E7 aligns with the NPPF (paras. 81, 83-85)	Significant weight
E8	New Tourist Attractions & Extensions	Objections of some significance	EC 7	CONSISTENCY: E8 aligns with the NPPF (paras. 84-85)	No weight
E9	Retaining an Adequate Supply & Mix of Tourist Accommodation	Less significant objection / comment	EC 8	CONSISTENCY: E9 aligns with the NPPF (paras. 84-85)	Significant weight
Places and Sites					
DS1	Site allocations	Various	N/A	CONSISTENCY: DS1 aligns with the NPPF to a significant degree (paras. 23, 68-69).	Limited weight (Partial)

Adoption of Coastal Adaptation Supplementary Planning Document	
Executive Summary	<p>The purpose of this report is to recommend the adoption of the Coastal Adaptation Supplementary Planning Document (SPD).</p> <p>The Coastal Adaptation SPD supports the implementation of existing and emerging planning policies relating to development within the Coastal Change Management Areas (CCMA), as well as, rollback and relocation away from the coast.</p> <p>The SPD provides overarching planning guidance in relation to the economic, social and environmental impacts of coastal change; the national and local policy frameworks; advice about different types of development within the CCMA's; rollback and relocation; enabling development; and, case study examples of coastal adaptation. In addition, the SPD includes guidance and templates for Coastal Erosion Vulnerability Assessments and example planning conditions.</p> <p>Appendices are available https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13715&path=0</p>
Options considered	<ul style="list-style-type: none"> • Make recommendations to Cabinet to adopt the Coastal Adaptation SPD. • Make recommendations to Cabinet to not adopt the Coastal Adaptation SPD and continue to implement planning policies with the existing North Norfolk Development Control Guidance, Development and Coastal Erosion, April 2009.
Consultations	<p>The Coastal Adaptation SPD has been subject to public consultation during its preparation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Council's Statement of Community Involvement (April 2021). The list of consultees, respondents, summaries of their comments and how these have been responded to, can be found in the Consultation Statement which is appended to this report at Appendix B.</p>
Recommendations	<ul style="list-style-type: none"> • To recommend to Cabinet that the Coastal Adaptation SPD is adopted. • That the Planning Policy Manager, in consultation with the Portfolio Holder for Planning, is authorised to make any presentational or typographical amendments to the Coastal Adaptation Supplementary Planning Document prior to it being published.

Reasons for recommendations	To provide guidance on the implementation of planning policies through a whole coast approach, from Holkham in Norfolk to Languard Point, Felixtowe, Suffolk.
Background papers	North Norfolk Core Strategy 2008 Core Strategy
	(incorporating Development Control Policies) Adopted 2008 (north-norfolk.gov.uk) North Norfolk Local Plan Proposed Submission Version Proposed Submission Version (Regulation 19 Publication) Local Plan (north-norfolk.gov.uk) Appendices are available https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13715&path=0

Wards affected	All Wards
Cabinet member(s)	Cllr. Andrew Brown, Portfolio Holder for Planning
Contact Officer	Caroline Dodden, Senior Planning Officer caroline.dodden@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Supports delivery of the objective to continue to take a lead role nationally in coastal management initiatives recognising our position as a “frontline” authority in meeting the challenge of rising sea levels.
Medium Term Financial Strategy (MTFS)	Not Applicable.

Council Policies & Strategies	<p>Statement of Common Ground on Coastal Zone Planning, September 2018: https://www.northernorfolk.gov.uk/media/8993/g4-norfolk-suffolk-coastalauthorities-socg-coastal-zone-planning.pdf</p> <p>North Norfolk Development Control Guidance, Development and Coastal Erosion, April 2009: Development Control Guidance Note: Coastal Erosion Risk (northernorfolk.gov.uk)</p> <p>North Norfolk Core Strategy, September 2008: Core Strategy (incorporating Development Control Policies) Adopted 2008 (north-norfolk.gov.uk)</p> <p>North Norfolk Local Plan Proposed Submission Version, January 2022: https://www.northernorfolk.gov.uk/media/7466/local-plan-proposed-submissionversion-reg-19-publication.pdf</p>
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Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	<p>17 August 2020: Members of the PPBHP noted the Initial Consultation Document with regards to the production of a joint Coastal Adaptation SPD, which was presented for information purposes.</p> <p>14 November 2022: Members of the PPBHP recommended to Cabinet that the draft Coastal Adaptation SPD be published for formal consultation.</p>

1. Purpose of the report

1.1 The purpose of this report is to recommend adoption of the Coastal Adaptation Supplementary Planning Document (SPD) (Appendix A), a planning document that will provide guidance on aligned policy using a holistic and ‘whole coast’ approach. The SPD is considered valuable in building upon the formal agreements of the Statement of Common Ground on Coastal Zone Planning (September 2018) between the partnership authorities and the ongoing partnership approach with Coastal Partnership East (CPE).

1.2 The Coastal Adaptation SPD supports the implementation of planning policies relating to development within the Coastal Change Management Areas (CCMA), and rollback and relocation away from the coast in the following local planning authorities:

- East Suffolk Council - Suffolk Coastal Local Plan (2020) and Waveney Local Plan (2019).

- Great Yarmouth Borough Council – Local Plan Part 1 (2015) and Part 2 (2021).
 - North Norfolk District Council - Core Strategy (2008) and emerging North Norfolk Local Plan (Proposed Submission Version) (2022).
 - Broads Authority – The Broads Local Plan (2019).
- 1.3 The existing North Norfolk Core Strategy planning policies are supported by the adopted Development Control Guidance on Development and Coastal Erosion (April 2009). If adopted, the Coastal Adaptation SPD would supersede this existing guidance document and would provide updated and consistent planning guidance across East Suffolk, Great Yarmouth, North Norfolk, and the Broads.
- 1.4 Adoption of the Coastal Adaptation SPD would provide guidance to assist with the implementation of the Council's existing Core Strategy policies EN11: Coastal Erosion and EN12: Relocation and Replacement of Development Affected by Coastal Erosion Risk, as well as, the emerging planning policies CC5: Coastal Change Management and CC6: Coastal Change Adaptation of the North Norfolk Local Plan, Proposed Submission Version (2022), which was submitted for independent examination in May 2023. On adoption, the Coastal Adaptation SPD would be a material consideration in the determination of planning applications within the District.

2. Introduction & Background

- 2.1 North Norfolk District Council in partnership with East Suffolk Council, Great Yarmouth Borough Council, the Broads Authority, and the shared Coastal Partnership East, has jointly prepared the Coastal Adaptation SPD. The document has been shaped by two rounds of public consultation, as required by the Town and Country Planning (Local Planning) Regulations 2021.
- 2.2 The Initial Consultation Document for the draft Coastal Adaptation SPD was brought to the Planning Policy & Built Heritage Working Party in August 2020, for information. This set in motion the first public consultation process that sought to inform the overall content and scope of the SPD. This initial consultation took the form of a questionnaire, to which 63 respondents made 288 comments. Summaries of the consultation responses, and how they were addressed in drafting the SPD are contained within the Consultation Statement (Appendix B).
- 2.3 The more detailed draft Coastal Adaptation SPD was presented to the Planning Policy & Built Heritage Working Party (PPBHP) in November 2022, where the content was discussed and the recommendation to Cabinet to publish the draft document for formal public consultation (Regulation 12) was agreed. Cabinet approved the matter on 3 January 2023. The details of this second consultation are set out in the next section at paragraphs 3.3 – 3.7.
- 2.4 Under the Environmental Assessment of Plans and Programmes Regulations 2004 screening was carried out on the draft Coastal Adaptation SPD to determine whether a full Strategic Environmental Assessment would be required. The screening concluded that this was not required. The final Strategic

Environmental Assessment (SEA) Screening Opinion is appended to this report (Appendix C).

2.5 Habitat Regulations Assessment screening was also undertaken, which concluded that implementation of the Coastal Adaptation SPD would not lead to likely significant effects on protected Habitat Sites and that it is, therefore, not considered necessary to undertake an Appropriate Assessment. The final Habitat Regulations Assessment Screening Statement is appended to this report (Appendix D).

3. Proposals and Options

3.1 The Coastal Adaptation SPD (Appendix A) provides guidance on a range of topics including appropriate development within the Coastal Change Management Areas, the requirements in relation to rollback and relocation of development away from the coast, consideration of enabling development proposals, and coastal adaptation case studies.

3.2 The fundamental principle of risk management and planning policy in coastal areas is that of Integrated Coastal Zone Management (ICZM), which is a process that requires the adoption of a joined-up and participative approach towards the planning and management of the many different elements in coastal areas (land and marine). The partnership authorities have and continue to implement an ICZM approach, as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning, and as signatories to the Coastal Concordat for England. The Coastal Adaptation SPD further supports the partnership authorities in taking a proactive approach to ICZM to ensure individuals and organisations at risk from coastal change are aware of the risks and can take action to adapt to them.

3.3 The second public consultation for the SPD ran between 25 January and 8 March 2023. The consultation was advertised on the Council's website, as well as on social media. Emails and letters were sent out at the start of the consultation to the consultees on the planning policy mailing list which includes town and parish councils, individuals and organisations, including those who were previously contacted or responded to the informal stage of the consultation. Paper copies of the documents were made available at the Council Offices and a number of local libraries. In total 52 respondents made 185 comments. Summaries of the consultation responses, and how they were addressed in refining the SPD, are contained in the Consultation Statement (Appendix B).

3.4 The main themes of the comments received are summarised below. However, some of the comments covered specific matters that are not possible to summarise in a succinct manner within this report. The full consultation responses have been published on the East Suffolk website (a link to this is provided on the Councils website) and all of the comments are summarised in the Consultation Statement (Appendix B).

3.5 The main issues raised through the consultation were that the draft SPD:

- Should address flood risk, as well as, erosion risk.
- Should alter the planning policies contained in the Local Plans.

- Should alter the coastal management approach for each stretch of the coast.
- Is difficult to understand due to the use of jargon and technical language.
- Should place greater emphasis on the sensitive natural and historic environment along the coast.
- Should address Nationally Significant Infrastructure Projects.
- Should include that development at or near the coast should not hinder opportunities to realign the England Coast Path.
- Should state that the approximate appropriate distance that development may be relocated away from a settlement should be increased.

3.6 A number of changes have been made to address many of the comments received, where appropriate, including:

- Clarification that the SPD does not address flood risk, which is assessed through other planning policies and site specific flood risk assessments.
- Clarification that the SPD cannot alter planning policies contained in a Local Plan.
- Clarification that the SPD cannot alter the coastal management approach for any stretch of coast set out in Shoreline Management Plans.
- Avoiding jargon and technical language, where possible, but acknowledging that technical language may be necessary in some circumstances.
- Greater emphasis has been placed on the sensitive environment along the coast.
- Clarification that the SPD cannot address Nationally Significant Infrastructure Projects which are determined by HM Government.
- Development at or near the coast should not hinder opportunities to realign the England Coast Path.
- The approximate appropriate distance that development may be relocated away from a settlement has been increased.

3.7 The comments made by Members at the PPBHWP meeting in November

2022, particularly in relation to flexibility and phrasing/ language used in relation to the rollback advice, were taken on board during this time and, overall, have resulted in changes to take better account of the subtle differences between the planning policies of the participating authorities. In addition, further changes have been made to address typographical and grammatical errors and to provide clarity on certain elements of the guidance.

3.8 **The recommended option** is for the Coastal Adaptation SPD to be adopted. This will mean the Council has an up-to-date SPD in place to guide the implementation of the existing and emerging coastal change planning policies.

3.9 **An alternative option** would be to not adopt the Coastal Adaptation SPD and continue to implement the existing and emerging planning

policies with the support of the existing Development Control Guidance on Development and Coastal Erosion (April 2009). However, this would be a significant missed opportunity to provide guidance and clarification on the requirements of the relevant planning policies in supporting their effective implementation.

4. Corporate Priorities

4.1 The Coastal Adaptation SPD can be linked to the Climate, Coast and Environment theme of the current Corporate Plan (2019-2023), in supporting delivery of the objective to continue *to take a lead role nationally in coastal management initiatives recognising our position as a “frontline” authority in meeting the challenge of rising sea levels.*

5. Financial and Resource Implications

5.1 The production of the Coastal SPD is undertaken through existing team resources and budget.

6. Legal Implications

The Coastal Adaptation SPD has been produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The Coastal Adaptation SPD has been subject to a Strategic Environmental Assessment Screening Opinion (Appendix C) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended). It has also been subject to a Habitats Regulation Assessment (HRA) Screening Statement (Appendix D) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). An Equality Impact Assessment (EqIA) Screening Opinion (Appendix E) was produced to meet the requirements of the Equality Act 2010.

7. Risks

The Council must produce planning documents, which comply with various regulatory and legal requirements and in determining its policy approaches, must be justified and underpinned by up to date and proportionate evidence. This includes the application of a consistent methodology which takes account of public feedback and national policy and guidance.

8. Net Zero Target

No assessment has been made against the council's Net Zero 2030 Strategy & Climate Action Plan, which is primarily a strategy with regard to its own operations.

9. Equality, Diversity & Inclusion

An Equality Impact Assessment Screening Opinion (Appendix E) was produced in October 2022 to accompany consultation on the draft Coastal Adaptation SPD. The assessment concluded no differential negative impacts on those with protected characteristics.

10. Community Safety issues

Not Applicable.

11. Conclusion and Recommendations

11.1 Adoption of the Coastal Adaptation SPD will provide consistent, overarching planning guidance to assist with the implementation of the Council's existing Core Strategy policies and the emerging policies within the North Norfolk Local Plan, Proposed Submission Version.

11.2 **To recommend to Cabinet that the Coastal Adaptation SPD is adopted; and,**

that the Planning Policy Manager, in consultation with the Portfolio Holder for Planning, is authorised to make any presentational or typographical amendments to the Coastal Adaptation SPD prior to it being published.

Appendix A: Coastal Adaptation SPD (September 2023)

Appendix B: Coastal Adaptation SPD Consultation Statement (September 2023)

Appendix C: Coastal Adaptation SPD SEA Screening Opinion (October 2022)

Appendix D: Coastal Adaptation SPD HRA Screening Statement (October 2022)

Appendix E: Coastal Adaptation SPD EqIA Screening Opinion (October 2022)

Appendices are available <https://modgov.north-norfolk.gov.uk/ecCatDisplayClassic.aspx?sch=doc&cat=13715&path=0>

North Walsham Development Brief Public Consultation	
Executive Summary	This report seeks agreement to publish a draft version of a Development Brief for the large-scale urban extension at North Walsham for a period of public consultation.
Options considered.	The Planning Policy and Built Heritage Working Party has previously considered the methods and time periods for consultation.
Consultation(s)	<p>The Local Plan has been subject to a number of external consultations in line with statutory requirements and been developed through collaborative internal engagement and Member steer through the Planning Policy & Built Heritage Working Party. Full Council authorisation for the submission of the Plan for independent examination was received on 1.3.23.</p> <p>The Authority has previously consulted on the scope of a Development Brief, a draft Master Plan, Vision, and set of high-level development principles. The Draft Development Brief builds on these previous themes.</p>
Recommendations	1. Members agree the Draft version of the North Walsham West Development Brief as a basis for a period of public consultation.
Reasons for recommendations	<p>The Local Plan is now at an advanced stage of production having been submitted for independent examination.</p> <p>Preparation and approval of a Development Brief is a policy requirement of the site allocation in the Local Plan. Its preparation will be a key indicator of the site's deliverability.</p> <p>The content of the Brief should be informed by comprehensive and inclusive engagement with stakeholders.</p>
Background papers	Submission version of the Local Plan and all background papers and supporting evidence including the previous consultation documents for North Walsham are published and available on the Councils new Local Plan examination Library Home Local Plan Examination (north-norfolk.gov.uk)

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown: Portfolio Holder for Planning
Contact Officer	Mark Ashwell, Planning Policy Manager

Links to key documents:

Corporate Plan:	Production of the Local Plan is a cross cutting theme in regard to delivery of the Corporate Plan's priorities.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Core Strategy and Site Allocations Development Plan Documents. Housing Strategy.

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	None

1. Background

1.1 The North Norfolk Local Plan proposes a large-scale urban extension to the west of North Walsham. The Local Plan policy attached to the proposed allocation includes a requirement that development should not occur until such time as a Development Brief has been prepared and approved for the site.

1.2 The policy requires:

'Prior approval and adoption of a comprehensive Development Brief incorporating a site wide Vision and Master Plan demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all uses and infrastructure required in this policy'.

1.3 The preparation and approval of a Development Brief is an important stage in the planning of the site. It is a tool used on largescale, multi-phase developments to establish the principles that subsequent planning applications should comply with. In the case of this proposal the policy also requires the approval of a number of other technical documents including a Design Code, Drainage Strategy, and Highway Strategy.

1.4 In May of 2021 the Council consulted on what were described as high level aims and objectives for the development of the site including an overall vision for the development and an illustrative Master Plan. The consultation responses and a number of technical appraisals have informed the preparation of a first draft of the Development Brief which, it is proposed, should be subject to public consultation.

- 1.5 The in-principal decision to allocate this site, or not, will be tested via the Local Plan examination so any final endorsement of the Brief will need to await the outcome of the examination, or be subject to allocation being confirmed. However, preparation of the Brief at this point in the process is clear evidence of the Authorities, and the site promoters, commitment to bring the site forward for development and would help at the Local Plan Examination hearings to demonstrate clearly to the Inspector that the proposals are deliverable.
- 1.6 At the July Working Party Meeting Members indicated their broad support for public consultation but deferred any final decision pending further work on the Brief and its endorsement, for public consultation purposes, at this meeting.

2. Consultation Proposals

- 2.1 It is recommended that the Brief should be subject to a significant period of public consultation similar to that undertaken on the Local Plan. This will include a range of media coverage, direct notifications, in person exhibitions, and consultation with all key internal and external consultees. Members indicated their broad support for the consultation arrangements at the last meeting.

3. The Brief

- 3.1 Abbreviated versions of the Draft Brief together with a summary of the off-site highway works are attached as Appendix to this report and have previously been circulated to Members

4. Recommendations

- 1. Members agree the Draft version of the North Walsham West Development Brief as a basis for a period of public consultation.**

5. Legal Implications and Risks

- 4.1 None

6. Financial Implications and Risks

- 5.1 None

Appendix – Consultation Draft – North Walsham West Development Brief and summary of off-site highway proposals.

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July 2023

ABBREVIATED DEVELOPMENT BRIEF

LAND WEST OF NORTH WALSHAM, NORFOLK



Quality Assurance

Site name: North Walsham West

Client name: Esco Developments, Lovell & Flagship Group

Type of report: Abbreviated Development Brief

Prepared by: Danielle Percy & Thomas Bacon

Signed:

 T. Bacon

Date: 18/07/2023

Reviewed by: Danielle Percy

Signed:



Date: 18/07/2023



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01. INTRODUCTION

It is the intention of this document to provide you with a summary of the key information contained within the Development Brief for allocation NW62/A, known as North Walsham West. For further information, please refer to the Development Brief.

This document will cover the vision for the future development of North Walsham West, summary information on the policy, context and technical opportunities and constraints, and how this is reflected in the emerging framework masterplan and design guidance.

North Walsham West is an allocation in the North Norfolk District Council emerging Local Plan, known as Policy NW62/A, Land West of North Walsham. The policy identifies that the 108ha urban extension is allocated for *'approximately 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road, Cromer Road and the industrial estate.'*

The Development Brief will be used as a basis to progress the Design Code and subsequent planning applications, guiding future decision making and any subsequent applications.



WHO PREPARED THE BRIEF

This document has been prepared on behalf of a consortium comprising of ESCO Developments, Flagship Group and Lovell (hereafter 'The Consortium'), who jointly have agreements with landowners covering much of the allocation boundary, in collaboration with North Norfolk District Council (NNDC). Further information on each of the Consortium parties follows.



'Our vision is to provide exemplar developments and to be respected by the Communities, Local Authorities and Landowners we work within. We believe the best and most successful residential developments are founded on a thorough understanding of the site location, local community interests and the local property market. We aim to deliver new developments that focus on complementing and enhancing their surroundings through comprehensive stakeholder engagement, public consultation and a hands-on approach.'



'Our vision to solve the housing crisis is based on a strong social purpose, reinvesting profit into providing more affordable homes through Profit for Purpose. We understand that locations can have a greater influence on people's lives, having the power to enhance or constrain the lives and opportunities for those that live there. We are confident in fulfilling our vision of ensuring that people can access high quality, affordable homes, which are well situated and part of a sustainable community.'



'We are a leading provider of partnership and open-market housing. We have expertise in housing-led regeneration including new-build, open market housing, refurbishment, planned maintenance and assisted living. As well as designing, building, and selling new homes, we work together with our partners to refurbish and maintain existing homes and regenerate neighbourhoods. We are committed to achieving Net Carbon Zero by 2030. We have been working in East Anglia for over 30 years, and pride ourselves on the high-quality homes we build and the legacy we leave in our communities. We work closely with local organisations, schools, and charities to support their work ensure our developments bring new opportunities and solid investment in long-term, sustainable skills for our region.'

SITE LOCATION

The site is located on the western boundary of North Walsham, a market town and civil parish in North Norfolk. It is the largest settlements within the district, and is located approximately 15 miles to the north of Norwich.

North Walsham offers a variety of existing facilities, including a collection of schools alongside a number of leisure, health and community buildings, which are well-distributed. North Walsham also benefits from a train station, operated by Greater Anglia on the Bittern Line, with hourly services in each direction. There are currently bus services which run along Colmer Road and Aylsham Road.

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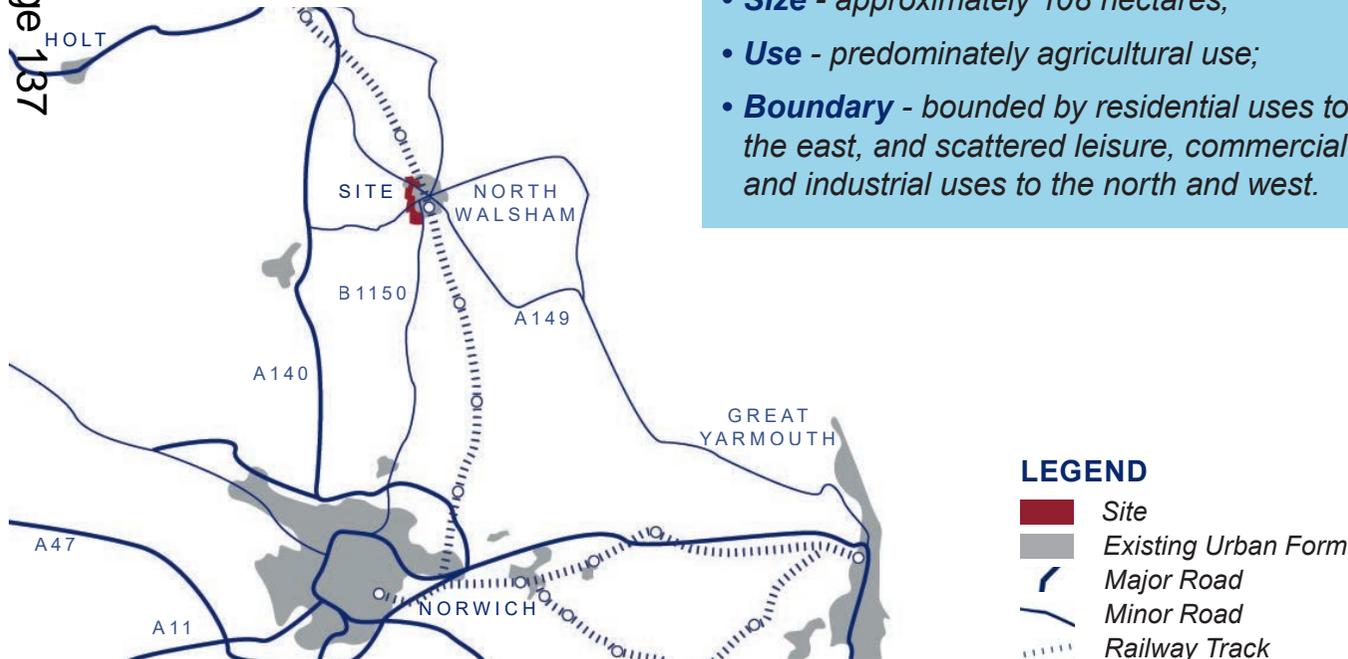


Figure 01; Regional site location

DEMOGRAPHICS

The emerging North Norfolk Design Guide identifies:

- **Property Supply** - 10% Second Home Ownership
- **Rapidly Ageing Population** - 35% are Over 65
- **Minority Ethnic Population** - 66% Christian & 25.7% No Religion

SITE INFORMATION

- **Size** - approximately 108 hectares;
- **Use** - predominately agricultural use;
- **Boundary** - bounded by residential uses to the east, and scattered leisure, commercial and industrial uses to the north and west.

LEGEND

- Site
- Existing Urban Form
- Major Road
- Minor Road
- - - Railway Track



Figure 02; Site aerial

02. THE DESIGN PROCESS

The delivery of a mixed-use development is being undertaken through a comprehensive and collaborative process with North Norfolk District Council, the community and stakeholders. This process is summarised below.

SITE ALLOCATION

There is a need to identify and allocate sufficient land to meet demand for a wide range of uses, including housing.

Accordingly, parcels of land are suggested by landowners that could meet this demand. This site was deemed suitable after its development potential was assessed against evidence base studies and infrastructure capabilities, allocated as part of North Norfolk Local Plan.

MASTERPLAN PREPARATION

Further analysis of the site is undertaken, which informed the vision, masterplans and design principles set out in the Vision Document and Development Brief.

These documents provide certainty in relation to the following;

- The delivery of the road, school & environmental infrastructure.
- Ensuring high standards of layout & sustainable design.
- Provision of affordable housing & care accommodation for older people.
- The comprehensive & organised delivery of the site.

SUBMISSION & DELIVERY

Following the endorsement of the Development Brief, a planning application will be progressed for their land.

This will include a Design Code, to be approved as part of the application which will control the specific requirements to achieve the design principles within this document.

The Design Code will control the content of any subsequent reserved matters applications, as the allocation is built out.

EMERGING ALLOCATION
DECEMBER 2020

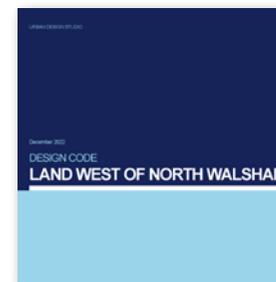
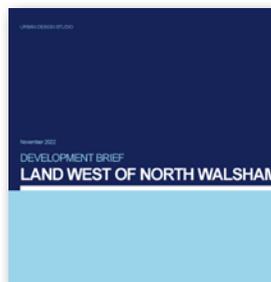
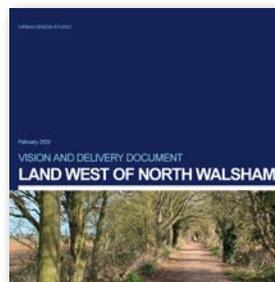
PUBLIC CONSULTATION
MAY & JUNE 2021

REGULATION 19 VISION DOCUMENT
FEBRUARY 2022

DEVELOPMENT BRIEF
OCTOBER 2023

DESIGN CODE
TBC 2023

PLANNING APPLICATION
TBC 2023



03. THE VISION

North Walsham West will be a sustainable extension to North Walsham, which integrates with, and positively contributes to the existing community, providing housing for a range of needs, within a strong Green Infrastructure network. Responding proactively to Climate Change, the extension should be held to high environmental standards, whilst acting as a catalyst for growth, helping to successfully shape the future of North Walsham.

North Walsham West will seek to support a development which is:

- **Sustainable** - Providing for the whole population, celebrating local pride and adaptability.
- **Landscape-Led** - Comprehensive Green Infrastructure Strategy which caters for ecology, recreation and sustainable travel.
- **Community Focused** - Inclusive, accessible community space at the heart of the development.
- **Employment Generating** - Enhance and create employment opportunities across the development.
- **Quality of Life Focused** - Achieved through seamless integration of the built and natural environment.



Figure 03; Vision for North Walsham West

04. POLICY & CONSULTATION

The following provides an overview of the local and national planning policy relevant to design and access considerations of the outline planning application.

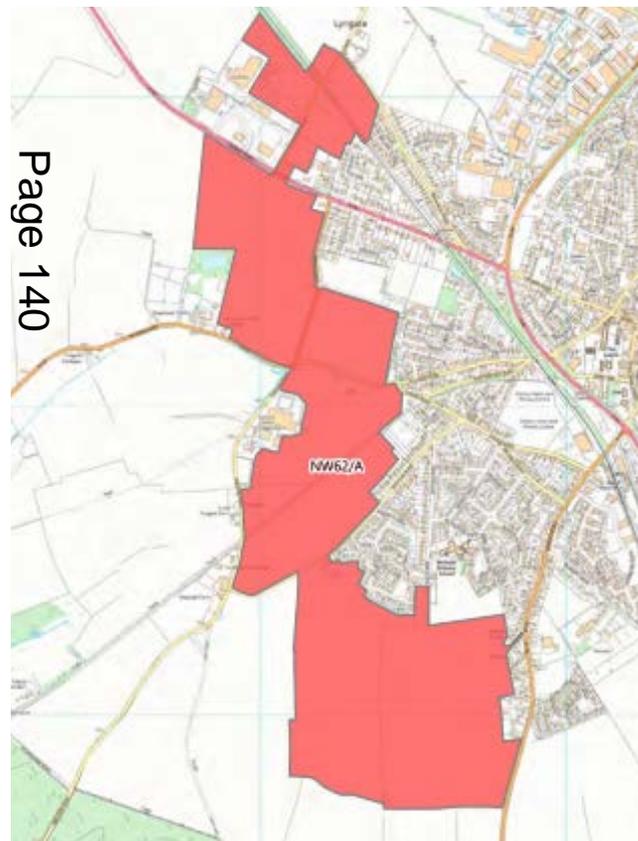


Figure 04; Map of Allocation NW62/A.

THE DEVELOPMENT BRIEF'S STUDY OF POLICY CONTEXT IS FULLY DETAILED ACROSS PAGES 16-20

NATIONAL DESIGN GUIDE 2019

North Walsham West will be designed in accordance with the principles set out within The National Design Guide, which sets out ten characteristics of a well designed place, set under three overarching themes of Climate, Character and Community:

- Context
- Identity
- Built form
- Movement
- Nature
- Public spaces
- Uses
- Homes and buildings
- Resources
- Lifespan

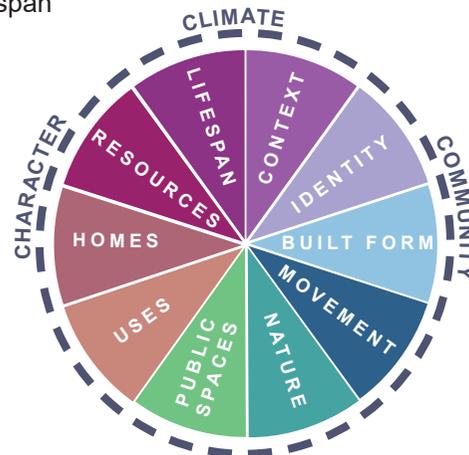


Figure 05; 10 Principles of a Well Designed Place, National Design Guide

NORTH NORFOLK LOCAL PLAN 2016-2036 (REGULATION 19 VERSION) (WITH PROPOSED MINOR MODIFICATIONS)

The site is allocated within the North Norfolk Local Plan 2016-2036 Regulation 19 version as a Mixed Use allocation - Land West of North Walsham (NW62/A). This allocation sets out that the site should deliver:

- Approximately 1800 dwellings;
- 7 ha of serviced employment land;
- Green infrastructure;
- Community facilities, including a new primary school;
- A road linking Norwich Road, Cromer Road and the industrial estate; and
- Other required infrastructure, improvements and mitigation including, but not limited to, health services, drainage and power.

This will be complimented by further consideration of:

- Development Brief & Design Code
- Green Infrastructure
- Environmental Mitigation
- Sustainable Transport
- Community Facilities & Employment
- New Homes
- Mineral Safeguarding

CONSULTATION MASTERPLAN

North Norfolk District Council undertook the North Walsham West Consultation and Engagement, in 2021, on the basis of the master plan (shown in Figure 06, adjacent). Selected responses from the community are as follows:

THE VISION

- Concern this will be a separate community on the outskirts of town, with a need to focus on benefits for all.

ENVIRONMENT AND CLIMATE CHANGE

- There is a need to include planned habitats, protected existing vegetation, limit light pollution and protect surrounding heritage assets.

HOUSES AND HOUSING

- High level of social housing to accommodate local people, considering bungalows, shared ownership and starter homes and the needs of elderly, disabled and those with special needs.

TRANSPORT AND MOVEMENT

- There is a need to prioritise high quality public transport, which includes pedestrians, cyclists, horse riders and buses.

DESIGN QUALITY

- The new development must integrate with the town, with the aim to be 'listed buildings of the future'. This will include integrating green design features, public art, and enhanced planting. There needs to be a consideration for the local vernacular, and use of a Design Code.

GREEN INFRASTRUCTURE AND OPEN SPACE

- Opportunity to provide high quality Green Infrastructure that provides for recreation and biodiversity.
- There is a need for green buffers along sensitive boundaries, which emphasise native tree planting.
- Approach to play must be inclusive, with facilities for older children and teens and creative approaches to sporting facilities.

INFRASTRUCTURE, COMMUNITY FACILITIES AND EMPLOYMENT

- Community centre will be a widely supported hub, with facilities for toddler groups, day care and youth clubs. This could include healthcare uses to support existing uses, alongside new supermarket and retail spaces.

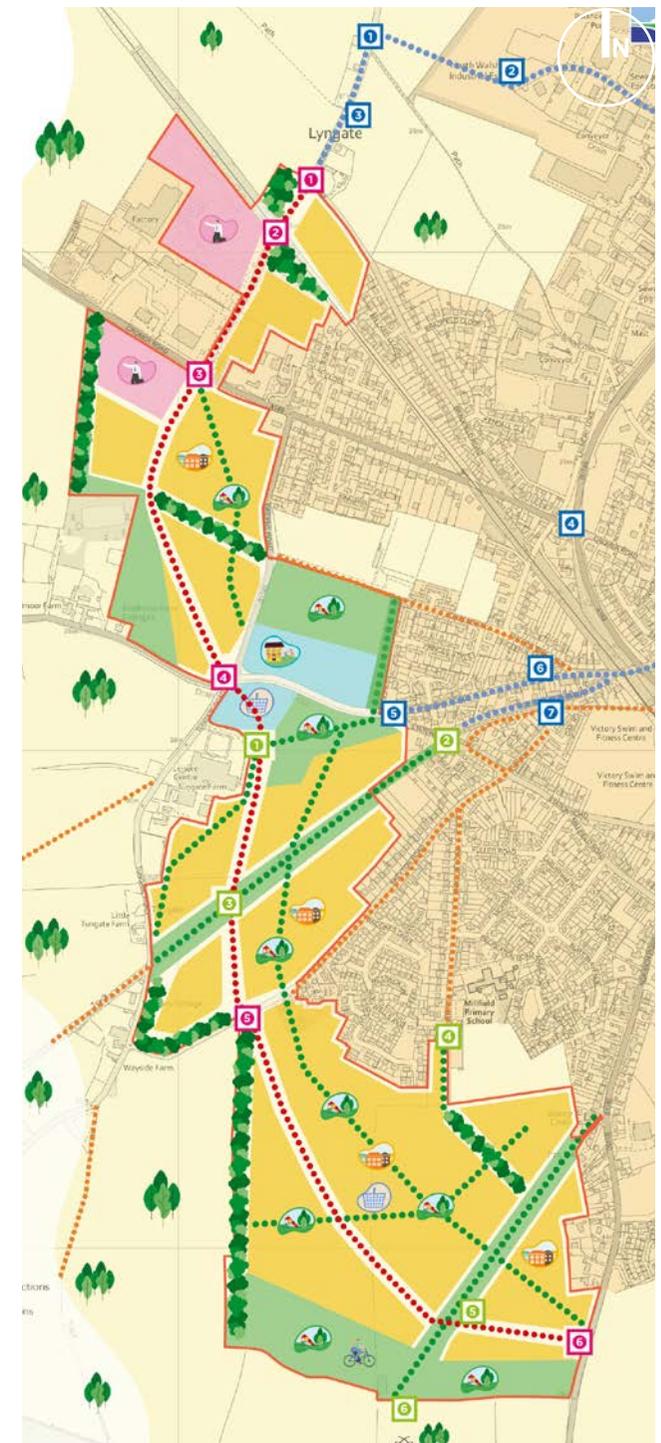


Figure 06; Consultation masterplan

05. SITE ANALYSIS

TOPOGRAPHY

The proposed development site follows a downward slope from its highest point in the south, of 35m-40m Above Ordinance Datum (AOD), before reaching an even plateau of 30-35m AOD which the majority of the site sits on. The topography of the site is generally open and accessible.

LEGEND

	Site Boundary		25m-30m AOD
	10m-15m AOD		30m-35m AOD
	15m-20m AOD		35m-40m AOD
	20m-25m AOD		40m-45m AOD

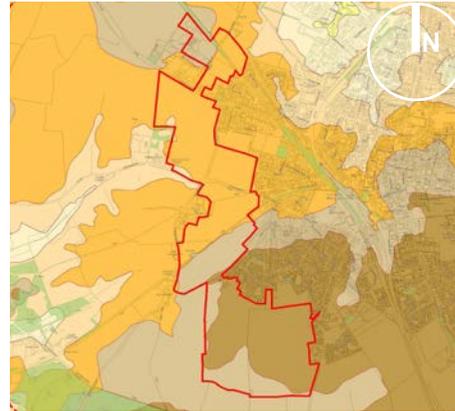


Figure 07; Topographic map

SIGNIFICANT VEGETATION & HABITATS

The site itself lacks areas of significant vegetation, but it has proximity to a high concentration of woodland habitats, deciduous woodland and woodland cover to the west and south. Additionally, the length of Weavers Way is a County Wildlife Site.

LEGEND

	Site Boundary		Woodland Cover
	2km Study Radius		Woodland Habitats
	Traditional Orchard		Deciduous Woodland

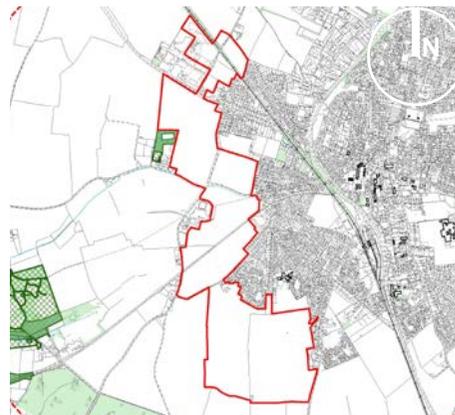


Figure 08; Significant vegetation map

FLOOD RISK & DRAINAGE

The site is at a low level of flood risk and contains no major watercourses, with GOV.UK mapping showing the site has less than 0.1% chance of flooding from rivers, the sea or surface water. Initial desktop studies and initial ground investigations show the site is predominantly underlain by sands and gravel and is understood to be generally freely draining.

HISTORY

North Walsham is built upon a strong central core of Listed Buildings and heritage assets contained within the North Walsham conservation area. The proposed development site is linked to this historical core through the bridleway system and proximity to an ancient battleground and farmhouses. Listed assets in proximity to the site are;

- Bradmoor Farmhouse (Grade II)
- Two Barns to East of Bradmoor Farmhouse (Grade II)
- Stump Cross (Grade II)

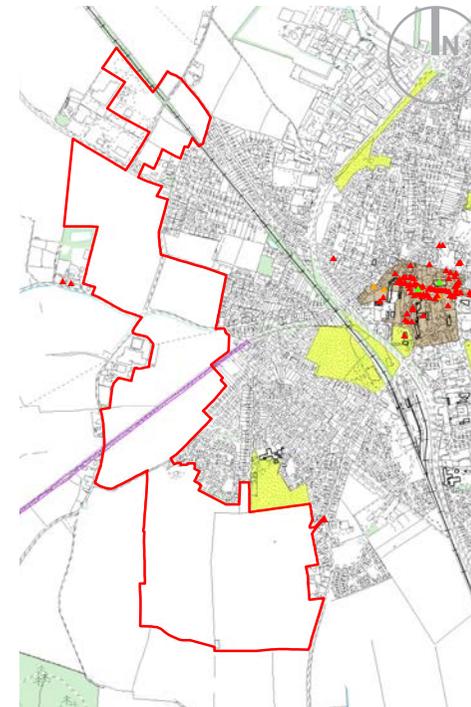


Figure 09; Heritage designations map

LEGEND

	Site Boundary
	County Wildlife Site
	Landscape Area
	Conservation Area
	Grade I Listed
	Grade II Listed
	Grade II* Listed

OWNERSHIP

The Consortium are responsible for the preparation of this Brief, which covers the entire allocation area. The Consortium also have control over the majority of the allocation site, outlined on the Figure below.

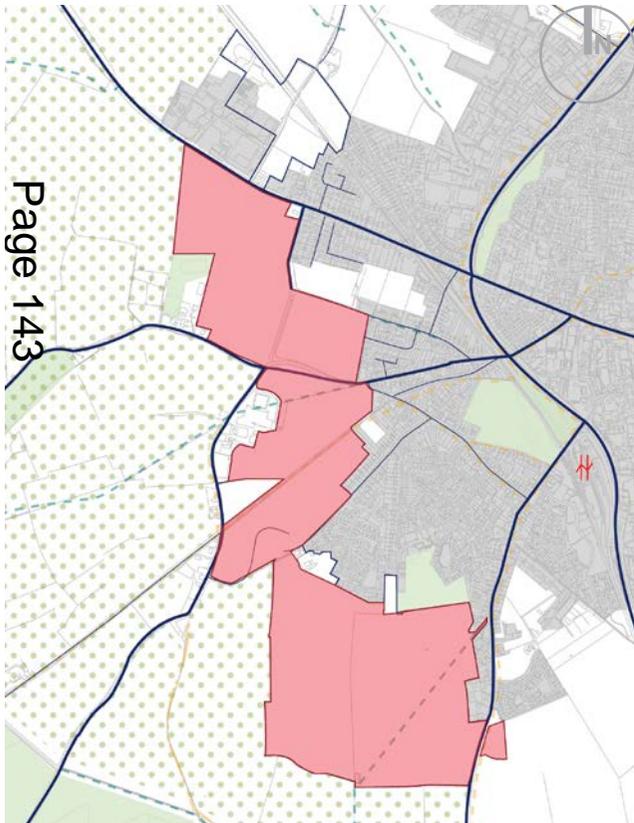


Figure 10; Area of consortium control

THE DEVELOPMENT BRIEF'S UNDERSTANDING OF SITE CONTEXT IS FULLY DETAILED ACROSS PAGES 22-41

BUILT FORM ANALYSIS

There is a need to understand the current built form of North Walsham, ensuring that the development accurately reflects and compliments the local vernacular.

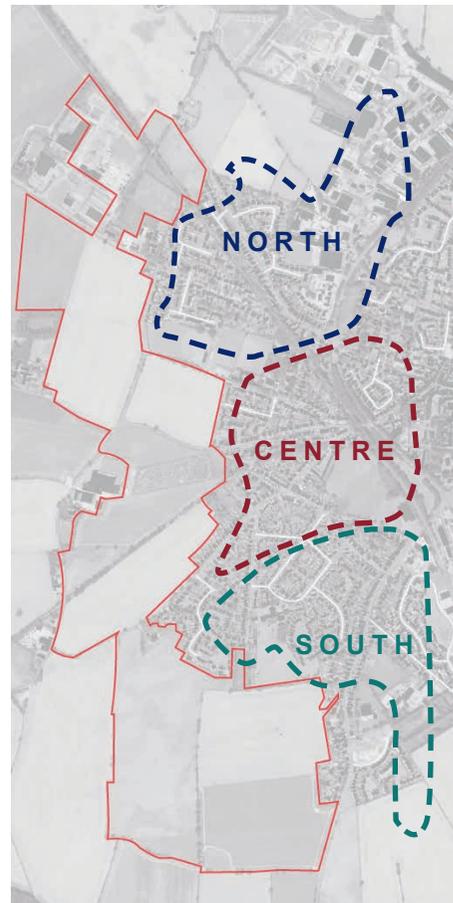


Figure 11; Built form & character study

NORTH

Key principles evident in this area include:

- Detached bungalows, converted 1.5 storey and 2 storey semi-detached dwellings.
- Red brick facades, with instances of buff brick, render and hanging tiles.
- Varied roof lines and chimneys.
- Varied boundary treatments with planting.



CENTRE

Key principles evident in this area include:

- Varied dwellings as part of cul-de-sacs and terraces, higher density streetscape.
- Red and buff brick facades, with instances of render and pebbledash.
- High proportion of listed buildings.
- Varied boundary treatments and limited setbacks.



SOUTH

Key principles evident in this area include:

- Varied dwellings, materials and architectural choices reflect variety of development ages.
- Red brick facades, with instances of buff brick, render and flint.
- Varied roof lines, heights and chimneys.
- Varied boundary treatments and parking.



OPPORTUNITIES & CONSTRAINTS

A number of constraints and opportunities have been identified which form the basis of the masterplan for North Walsham West. These have been identified through specialist technical work and site observations to ensure North Walsham West is responsive to its local context.

SITE BOUNDARIES

- The eastern boundary of the site is shared with urban, residential areas. These boundaries, which include residential frontages and back gardens, need to be carefully considered to ensure safety, security and privacy.
- There are a number of Listed Buildings and structures in proximity to the site, with their setting requiring consideration.
- The North Walsham Football Club is of high social value, having the opportunity to potentially expand and enhance these facilities within the site.
- The North Walsham Industrial Estate and the Building Supply Yards are prominent in the landscape, and they should inform the location of the employment land proposed in the allocation.
- A sensitive boundary occurs with Millfield Primary School, currently bounded by agricultural fields, there will be a need to secure this boundary.

POSSIBLE CONTAMINATION & GROUND CONDITIONS

- A preliminary risk assessment suggests overall risk from soil contamination is assessed to be low, therefore acceptable for human health and property.

UTILITIES

- There are a number of easements which cross the site, associated with the alignment of known utility corridors. These are protected within the masterplan.
- A drinking water abstraction borehole is located in the south of the site, resulting in the site being within a Source Protection Zone. The resulting drainage strategy is subject to coordination with the Environment Agency.

PUBLIC TRANSPORT

- There are bus stops in close proximity to the eastern boundary of the site. There is opportunity to provide new bus stops within the site, extending existing bus services frequency, alongside a bus interchange.
- The site is near North Walsham rail station which is on the Bittern Line with hourly Greater Anglia services to Norwich and Sheringham.

SUSTAINABILITY

- There are opportunities to promote active travel, integrate vegetation into the scheme, deliver biodiversity net gain through a proactive approach to water, wellbeing and wildlife.

VEGETATION

- There is opportunity to retain mature existing vegetation, as identified by an Arboricultural Assessment. This vegetation is associated with field margins, Public Rights of Way and Recreational Routes to provide structure to the development.

PEDESTRIAN AND CYCLE LINKS

- Public Rights of Way and Recreational Routes will be protected, and improved as green corridors.
- All cycling routes and junctions will be designed to the standards set in Cycle Infrastructure design (LTN 1/20).
- There is a significant view of St Nicholas' Church along Public Footpath 2. This is a key wayfinding point and connection to North Walsham's Heritage to be retained.

ECOLOGY

- The North Walsham Urban Extension will deliver a minimum of 10% uplift in biodiversity to achieve Biodiversity Net Gain.
- The Urban Extension of North Walsham sits on an area identified by Buglife as part of the B-Line network, aiming to connect and expand fragmented habitats for pollinators. Opportunity should be taken to ensure there is room for pollinators at all levels of detail.
- Trees identified as having a high potential for bat roosting will be protected and incorporated into the site's Green Infrastructure strategy.

SUMMARY OF OPPORTUNITIES

The proposed development site offers the opportunity to provide an integrated, connected and appropriate new community through the provision of a comprehensive, well designed, urban extension to North Walsham.

The development has the opportunity to create new sustainable active travel and green links to connect North Walsham, whilst also retaining an appreciation for the town's rich historical core, with the opportunity to put sustainability at the heart of the proposals.

It can be concluded, the proposed development should adopt an accessible and appropriate approach, creating connections throughout North Walsham's. This will ensure acceptance and integration with the existing community, whilst maximising the potential for the future use and enjoyment of residents.

Page 14/15

THE DEVELOPMENT BRIEF'S APPROACH TO SITE ANALYSIS IS FULLY DETAILED ACROSS PAGES 42-49

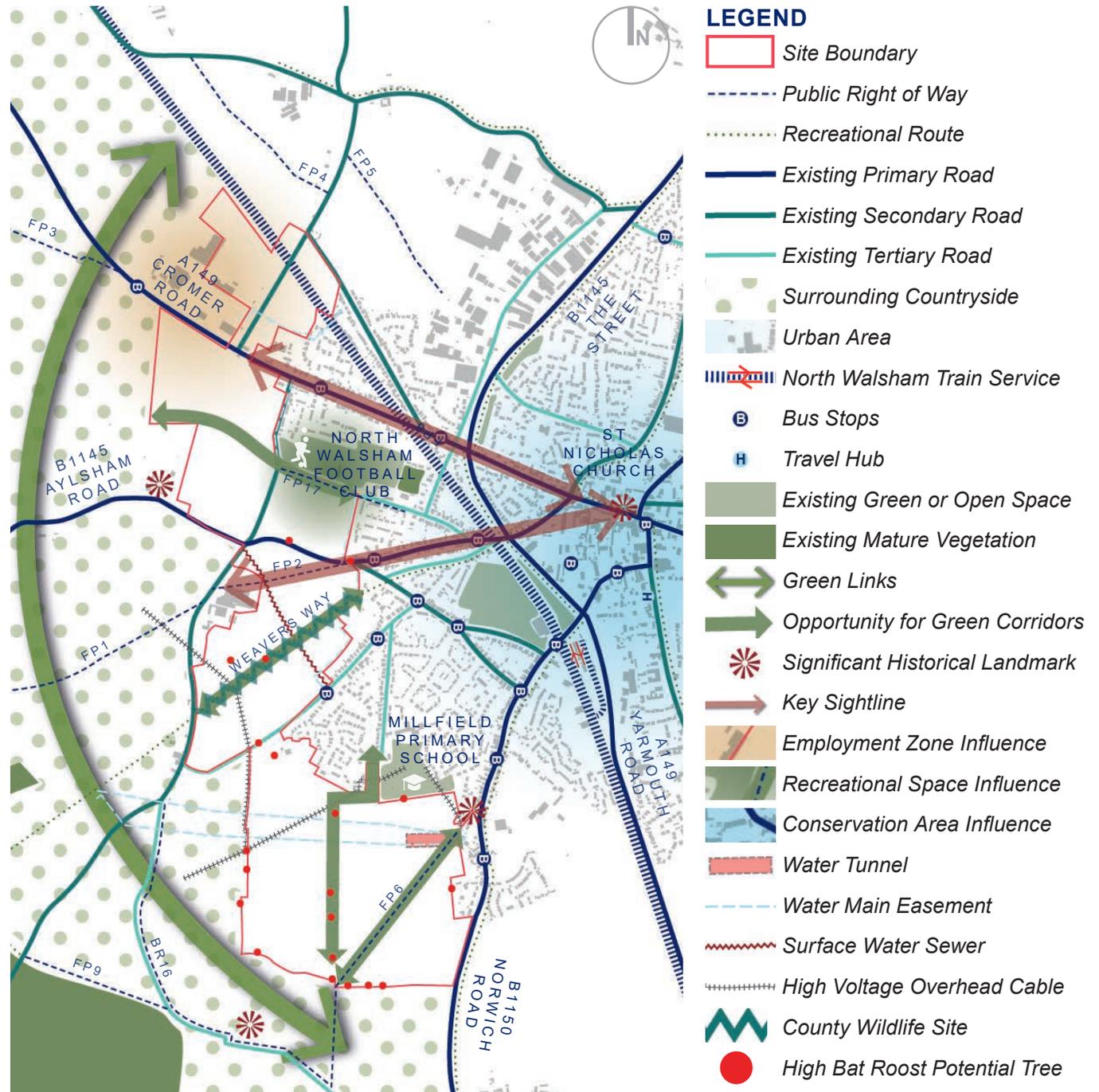


Figure 12: Opportunities and constraints diagram

06. THE DEVELOPMENT FRAMEWORK MASTER PLAN

The development framework master plan demonstrates how the vision for North Walsham West can deliver the aspirations set out within planning policy. The development will:

SUSTAINABLE

- Provide a clear site-wide access and travel framework which prioritises active transport, enhancing the safe movement of people, wildlife and water, alongside native planting and green corridors.

LANDSCAPE LED

- Create a strong Green Infrastructure network which will compliment the proposed built form, informed by the existing landscape. This will also ensure the site delivers a minimum 10% Biodiversity Net Gain whilst providing recreational opportunities for new and existing communities.
- Establish a 10ha country park along the southern and western boundaries will provide an appropriate edge to the countryside beyond, especially the adjacent historic Battlefield Site.

EMPLOYMENT GENERATING

Create 7ha of employment land located in accessible, collocated hubs, which will encourage the use of low carbon and renewable energy technologies. This will demonstrate the site's investment into North Walsham's economy and job market.

QUALITY OF LIFE FOCUSED

- Providing clear, distinctive neighbourhoods that are inclusive and enhance the character and setting of North Walsham. Active transport and considered connections with the existing community and amenities will be key to promoting a shared high quality of life across the site. Housing and public space will be adaptive to changing needs and uses, prioritise energy efficient design, and include a locally appropriate mix of affordable housing.

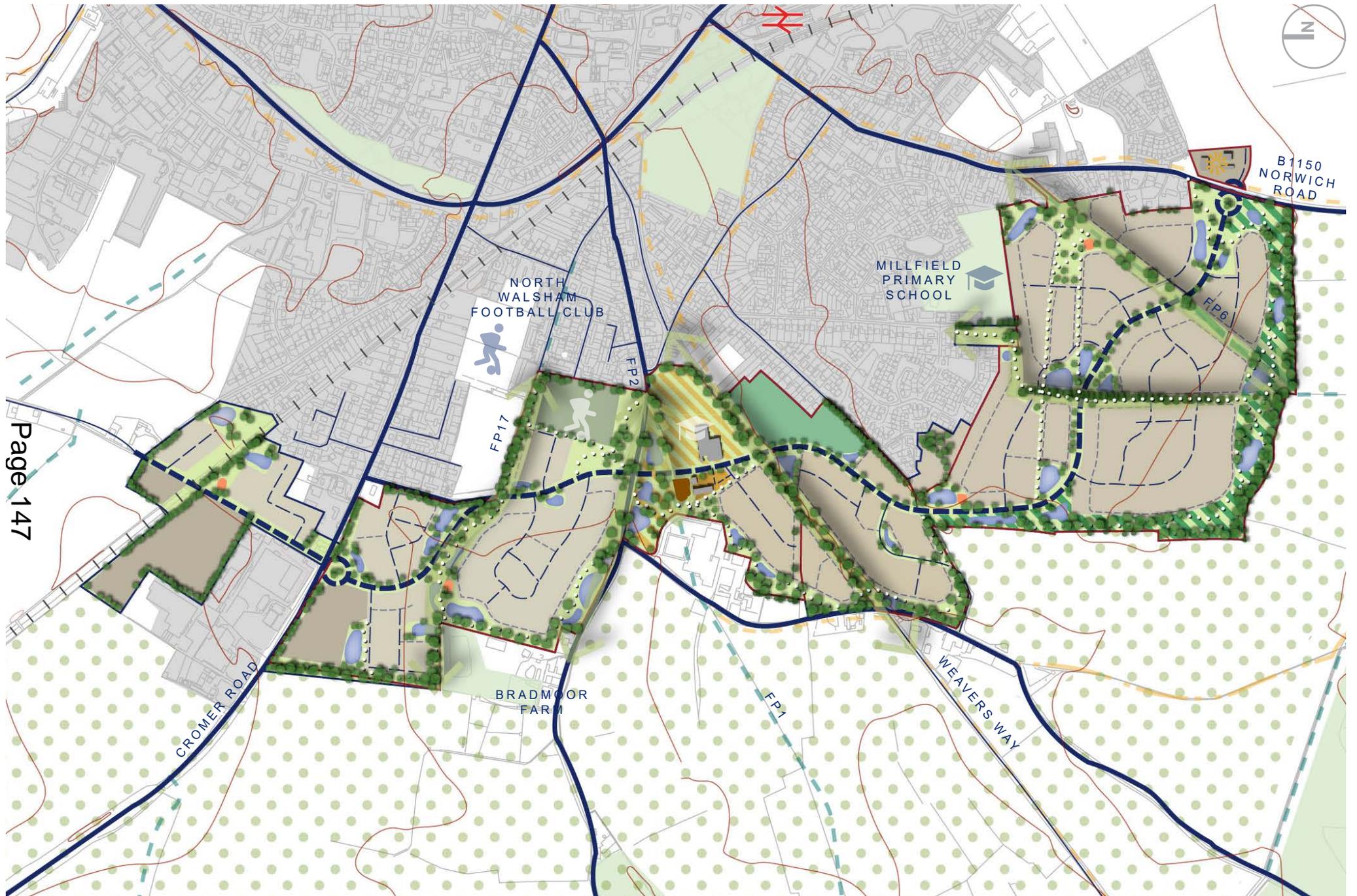
COMMUNITY FOCUSED

- Create a Local Centre and Primary School at the centre of the site co-located between the PRow North Walsham FP2 and Weavers Way, linked by the main residential street. This puts these community facilities at the strategic and physical heart of the new community, supported by a town plaza, town park, allotments and sports provision.
- An additional secondary retail and service space will be located to the south-east. Chosen uses will be reflective of local need and further demonstrate the 15-minute neighbourhood approach instilled across the development.

THE DEVELOPMENT BRIEF'S APPROACH TO KEY PRINCIPLES IS FULLY DETAILED ACROSS PAGES 50-58

LEGEND

	Residential
	Employment
	Local Centre & Plaza
	School
	Link Road
	Proposed Vegetation
	Proposed Open Space
	Proposed Infiltration Basins
	Proposed Footpath Link
	Public Right of Way
	Recreational Route
	Bridleway
	Existing Road
	Surrounding Countryside
	Urban Area
	North Walsham Train Station
	Existing Green or Open Space
	Secondary Local Facilities
	LEAP
	NEAP
	Allotments
	Sport Provision



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Figure 13; Framework masterplan

07. GREEN INFRASTRUCTURE

The strong Green Infrastructure network that is proposed as part of the development will provide extensive benefits to existing and proposed communities, alongside the surrounding landscape. This will deliver:

- 37.11 ha of proposed open space (34.27% of the total site area).
- A minimum 10% BNG uplift.
- Attractive and functional spaces for residents and local ecology.
- Accessible, well-distributed play spaces.
- Full compliance with the needed allocation policy features (sports provision, allotment, town park).
- Structural planting, which includes strong, natively planted buffers adjacent to existing residential properties.
- Appropriate sustainable drainage strategy.
- Integration of planned habitat features, such as bat and owl boxes along with wildflower and pollinator planting to support diverse ecology.

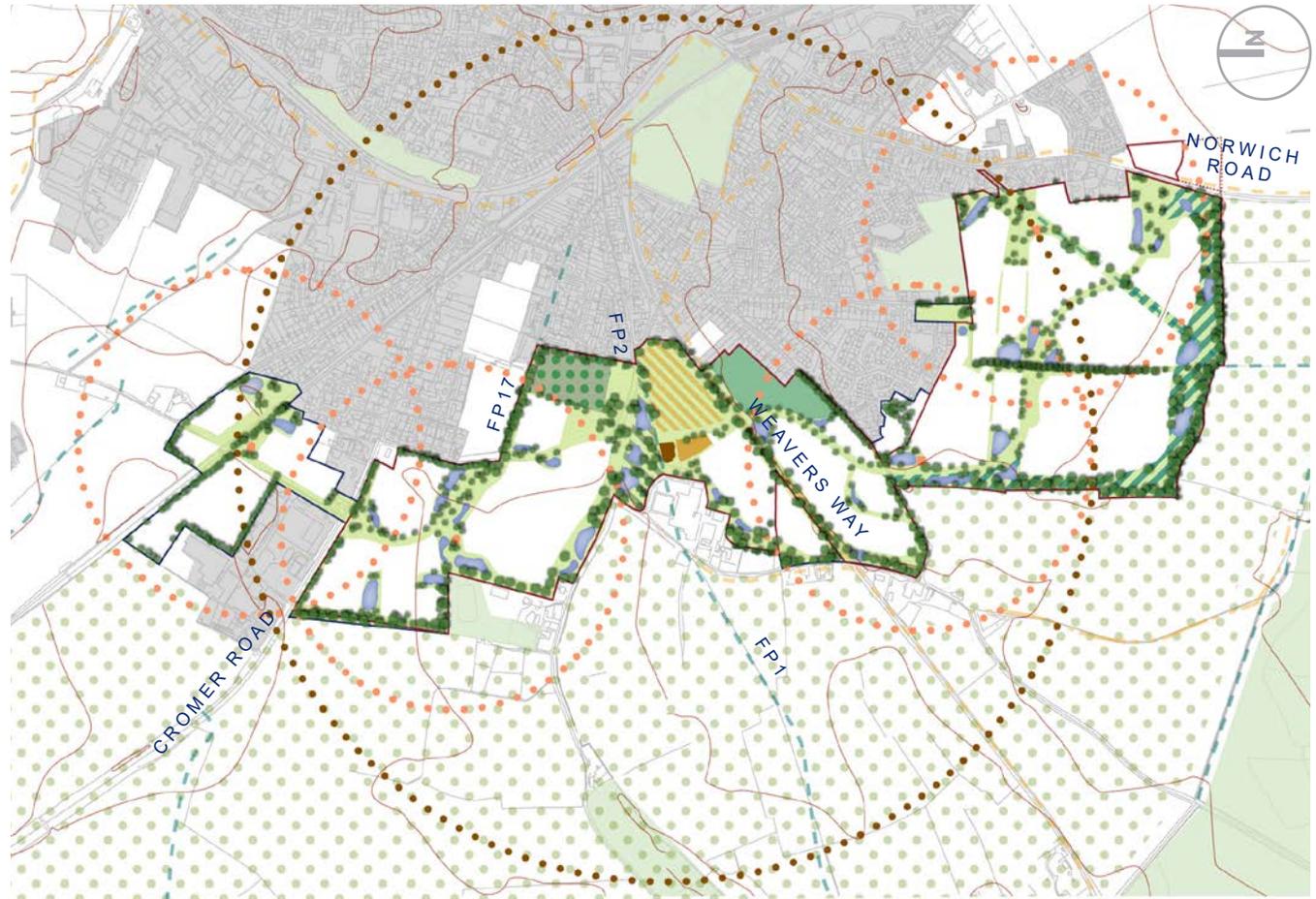


Figure 14; Green Infrastructure (GI) strategy

LEGEND

- | | | |
|---|------------------------|------------------------|
| Red Line Boundary | Allotment | 1km Proximity to NEAP |
| Local Equipment Area for Play (LEAP) | Country Park | Surrounding Rural Land |
| Neighbourhood Equipped Area for Play (NEAP) | Town Park | |
| Sport Provision (green dots) | 500m Proximity to LEAP | |

THE MASTERPLAN'S APPROACH TO GREEN INFRASTRUCTURE IS FULLY DETAILED ACROSS PAGES 58-63



Figure 15; Examples of how the site's green infrastructure will interact and be engaged with

08. TRANSPORT & ACCESS

The identified transport strategy for Land West of North Walsham will:

- Enable safe, direct and accessible movement for people throughout, to and from, the development site.
- The urban transport hierarchy will be respected in the transport strategy, in line with the 15 minute neighbourhood ethos, with an emphasis on providing for active modes of transport and on site services.

Design of all proposed infrastructure to correspond with the latest policy and guidance documents (e.g. Manual for Streets, LTN 1/20).

Page 150



Figure 16; Preferred hierarchy of movement

ACCESS ROAD

Deliver a new access road to the west of North Walsham connecting B1150 Norwich Road, the B1145 Aylsham Road the A149 Cromer Road. Features of this Access Road include:

- High quality, segregated pedestrian and cycling routes with priority across side roads to support permeability across the access road;
- High Priority crossing points for pedestrians and cyclists along all key desire lines;
- Connect to network of pedestrian and cycle routes through development land;
- No on street parking proposed along primary route;
- Inclusion of urban roundabouts and traffic signals;
- Allowance for two green corridors along the length, which can be used for planting or swales;
- Designed to support bus routing and accommodating well positioned bus stops;
- Appropriately sized to accommodate all vehicle types and through diverted traffic;
- Corridor for utilities to minimise future disturbances;
- Designed to a 30 MPH speed limit, and;
- Access road and masterplan for allocation land to the north of Cromer Road to be designed to allow for future provision of an extension north to North Walsham Industrial Area.



Figure 17; Typical section diagram of access road through the local centre

PUBLIC TRANSPORT

Well positioned bus stops are proposed to be created on the access road between Cromer Road and Norwich Road. In addition, a bus interchange is proposed on the access road in the southern section of the site. This stop would serve the 20 minute frequency X55 service, with a short diversion into the site from Norwich Road.

OFF SITE IMPROVEMENTS

Safe, active travel routes are to be achieved between the development and North Walsham Town Centre and North Walsham Railway Station with focused improvements on the following corridors:

- A2. Cromer Road Corridor
- A5. Weavers Way / Aylsham Road Corridor
- A8. Norwich Road Corridor.

These improvements include;

- Help deliver signalised crossing facilities at the Norwich Road / A149 traffic signal improvement scheme;
- Provide for longer distance, sustainable journeys through bus service, stop and routing enhancements, and improved accessibility to North Walsham Railway Station;
- Reduce HGV traffic, and local traffic on existing local routes through new access road; and
- Deliver traffic management improvements in Coltishall to reduce congestion.

THE MASTERPLAN'S APPROACH TO TRANSPORT & ACCESS IS FULLY DETAILED ACROSS PAGES 65-71

LEGEND

- Site Boundary
- Link Road
- B Existing Bus Stops
- B Proposed Bus Stops
- Proposed 33A Extension
- Proposed X55 Extension
- ✈ Rail Line & Station
- X55
- 210
- 18
- 33A
- 6A
- ✳ Bus Interchange
- 500m Walking Radius

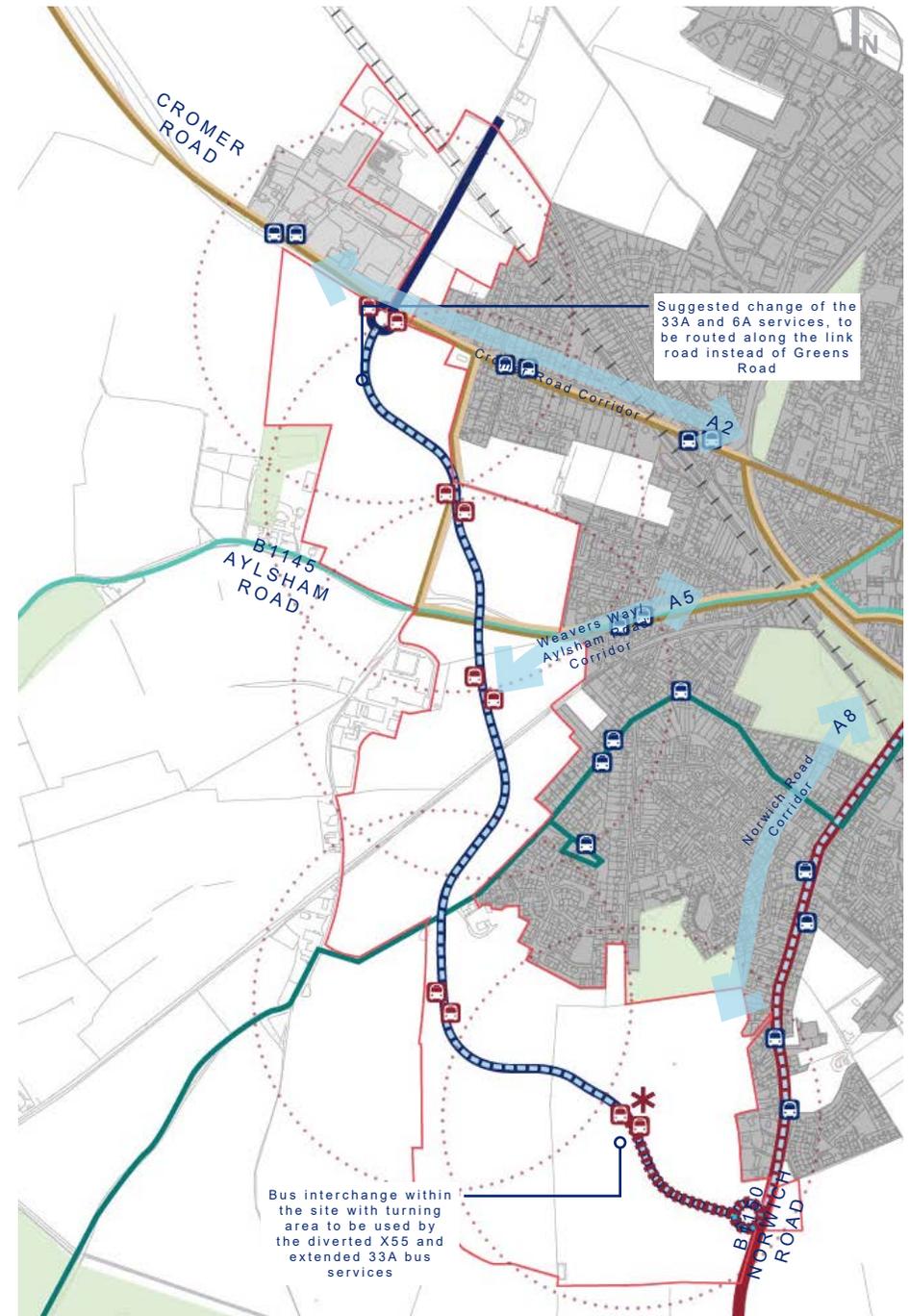


Figure 18; North Walsham West public transport plan

09. CHARACTER AREAS

The Proposed Urban Extension of North Walsham will be separated into three varied, but interconnected, character areas. These areas will be tailored to respond to, the built form which they are sited next to.

The Northern Character Area will;

- Develop in keeping with the existing residential footprint and style.
- Retain open sightlines and connection to rural land.
- Be a mid to lower density neighbourhood.
- Be forward looking, containing employment areas highlight invest into North Walsham's job market.

The Central Character Area will;

- Act as the nexus of the development, containing the majority of facilities, ensuring interaction and engagement.
- Be a higher-density residential area that reflects this more intensive use.
- Link to existing recreational routes and open space.

The Southern Character Area will;

- Be varied in density, building style and design.
- Respect the sensitive green boundaries through the placement of a country park.
- Be permeable and environmentally engaged through the use of green corridors.

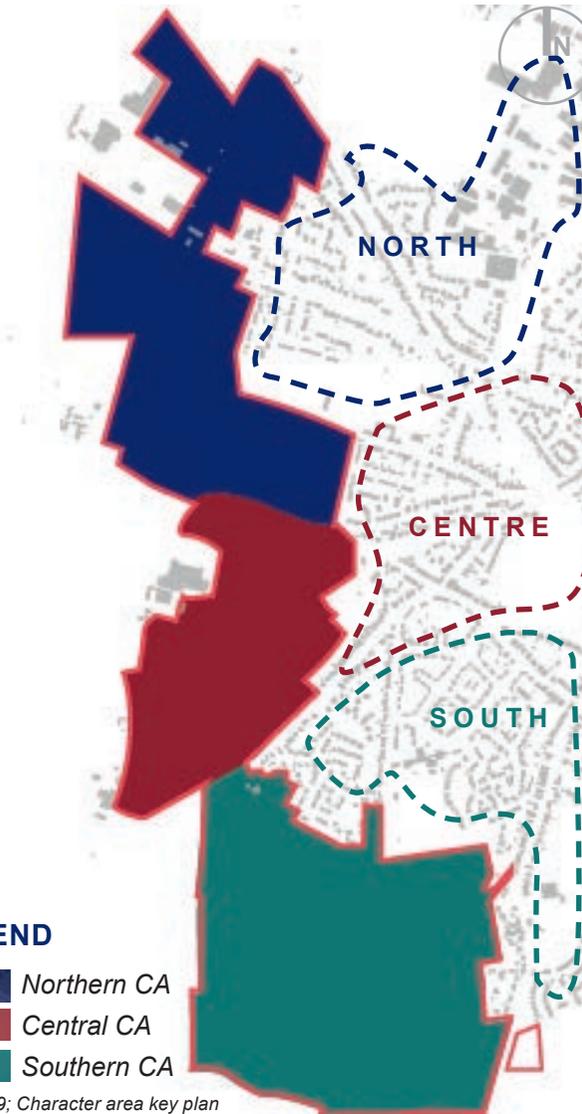


Figure 19: Character area key plan

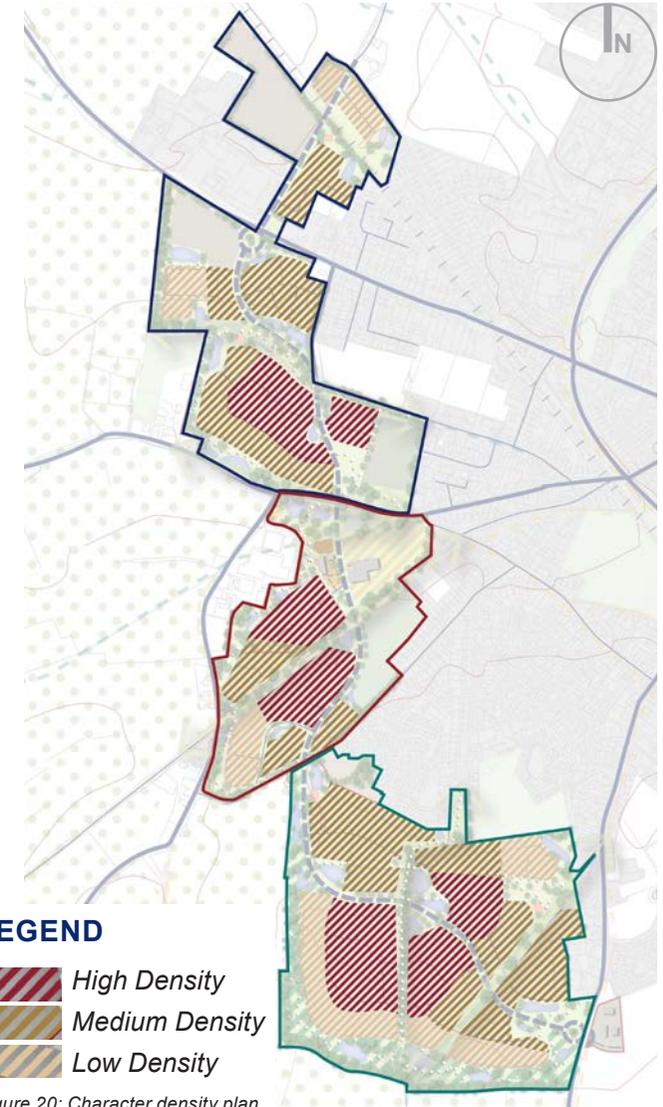


Figure 20: Character density plan

THE MASTERPLAN'S APPROACH TO CHARACTER AREAS IS FULLY DETAILED ACROSS PAGES 72-95

NORTHERN

- INFORMAL
- INTEGRATED LANDSCAPE
- CONNECTED
- LOWER DENSITY

CENTRAL

- COMMUNITY
- URBAN
- GREEN LINKS
- TREE LINED AVENUES
- PERIMETER BLOCKS

SOUTHERN

- GREEN CORRIDORS
- COUNTRY PARK
- VARIED DENSITY
- INFORMAL
- GATEWAYS

Figure 21; Character area characteristics and precedents

10. DELIVERY

PHASING AND INFRASTRUCTURE

The delivery of all elements of the Urban Extension will be logically phased, with exact numbers and delivery years to be agreed. The delivery of infrastructure and community facilities, including the school will be delivered at key thresholds to be agreed with North Norfolk District Council and other stakeholders, notably NCC Highways and Education, based on housing delivery and occupation.

LOCAL CENTRE

Delivery of the local centre will be determined based on the ability of the development site to deliver necessary funding, and ensure the critical mass required to support the viability of the commercial spaces, to deliver a vibrant community resource.

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SCHOOL

The exact delivery of the school will be prepared in coordination with the education authority, to coordinate with the delivery of residential units.

RESIDENTIAL DEVELOPMENT

Construction of the residential development parcels will likely begin adjacent to Norwich Road and Cromer Road, moving north and south respectively.

AFFORDABLE HOUSING

Affordable housing will be developed alongside market housing in accordance with delivery requirements.

GREEN INFRASTRUCTURE

Green Infrastructure will be delivered in a phased approach, alongside residential development. This includes appropriate extents of Sustainable Drainage Systems, and upgrades to Public Rights of Way.

EMPLOYMENT LAND

The employment land can be bought forward subject to market demand. Appropriate triggers for this will be agreed at outline application stage.

GOVERNANCE

It is anticipated that a management company will oversee the long term maintenance of all open space areas and any other non-adoptable areas.

Affordable dwellings and dedicated housing for the elderly, or retirement communities may be managed by public or private companies.

PLANNING APPLICATIONS

This Development Brief sets out the requirements of North Norfolk District Council in regards to allocation NW62/A.

It is expected that this allocation will be delivered in a number of discrete outline applications, based on land ownership and control. Following the endorsement of this Development Brief, a more detailed Design Code will be drafted quantifying the relevant design principles to be respected in regards to future outline and reserve matters applications.



CONCLUSION

This document summarises how the allocation requirements set out in Policy NW62/A of North Norfolk's emerging local plan will be achieved.

This document demonstrates how a development can be brought forward which integrates well with North Walsham, delivering a sustainable, mixed-use site which positively connects with and actively contributes to North Walsham. This will include;

- Housing which caters for a wide range of needs that responds proactively to climate change.
- A local centre and school, which will create a strong community core.
- Encouraging sustainable active travel alongside 15 minute neighbourhood principles.
- Proposed employment land which will act as a catalyst for growth for North Walsham, providing long term local employment opportunities.
- Proposed allotments and enhanced sports provisions will provide valuable opportunities for future and existing residents to mix.
- Proactive response to climate change, with high environmental standards, use of renewable energy sources and appropriate building techniques.



Figure 22; Framework masterplan

APPENDIX A

LIST OF FIGURES

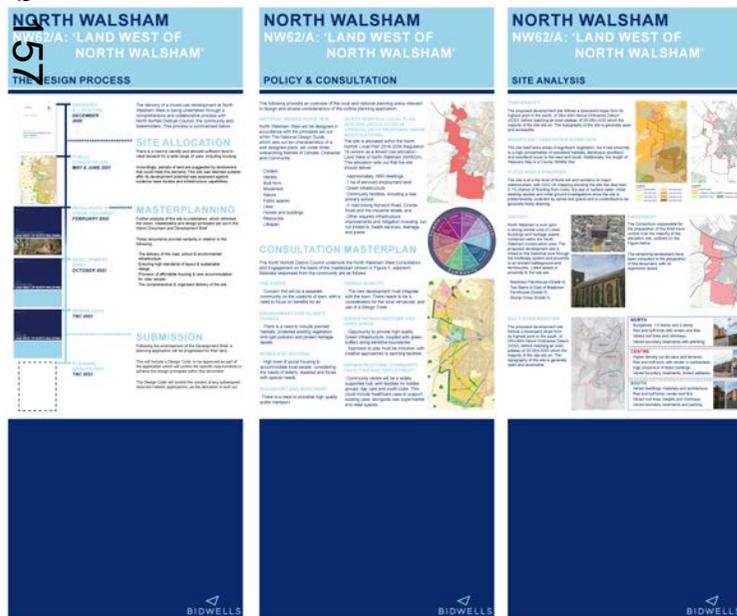
Figure 01;	Wider site location	5	Figure 17;	Typical section diagram of link road	18
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APPENDIX B

EXAMPLES OF EXHIBITION BOARDS

Examples of the proposed exhibition boards for NW62/A 'Land West of North Walsham', based on the content within the Development Brief. This includes a draft mock up of how these exhibition boards may be set up for a consultation session.

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Bidwell House,
Trumpington Road,
Cambridge
CB2 9LD

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North Walsham Western Urban Extension Transport Overview

North Walsham Members Briefing

**Bevin Carey BE Hons (Civil) CEng MIEI,
Regional Director**

Local Plan Transport Evidence – Approach

➤ Partnership Approach with Norfolk County Council and North Norfolk District Council.

- Previous evidence and studies shared;
- Feedback from NNDC & BDC;
- Scope developed together;
- Regular meetings;
- On site walkover;
- Mitigation developed with input from NCC Road Safety and Development Management team.

➤ Robust Assessment

- Extensive baseline data gathered;
- Conservative assumptions;
- Bespoke microsimulation model for North Walsham & Coltishall Towns, highly calibrated models, ideal for modelling non-standard arrangements and allowing for route choice;
- Evidence led transport strategy.

Local Plan Transport Evidence – Current Position

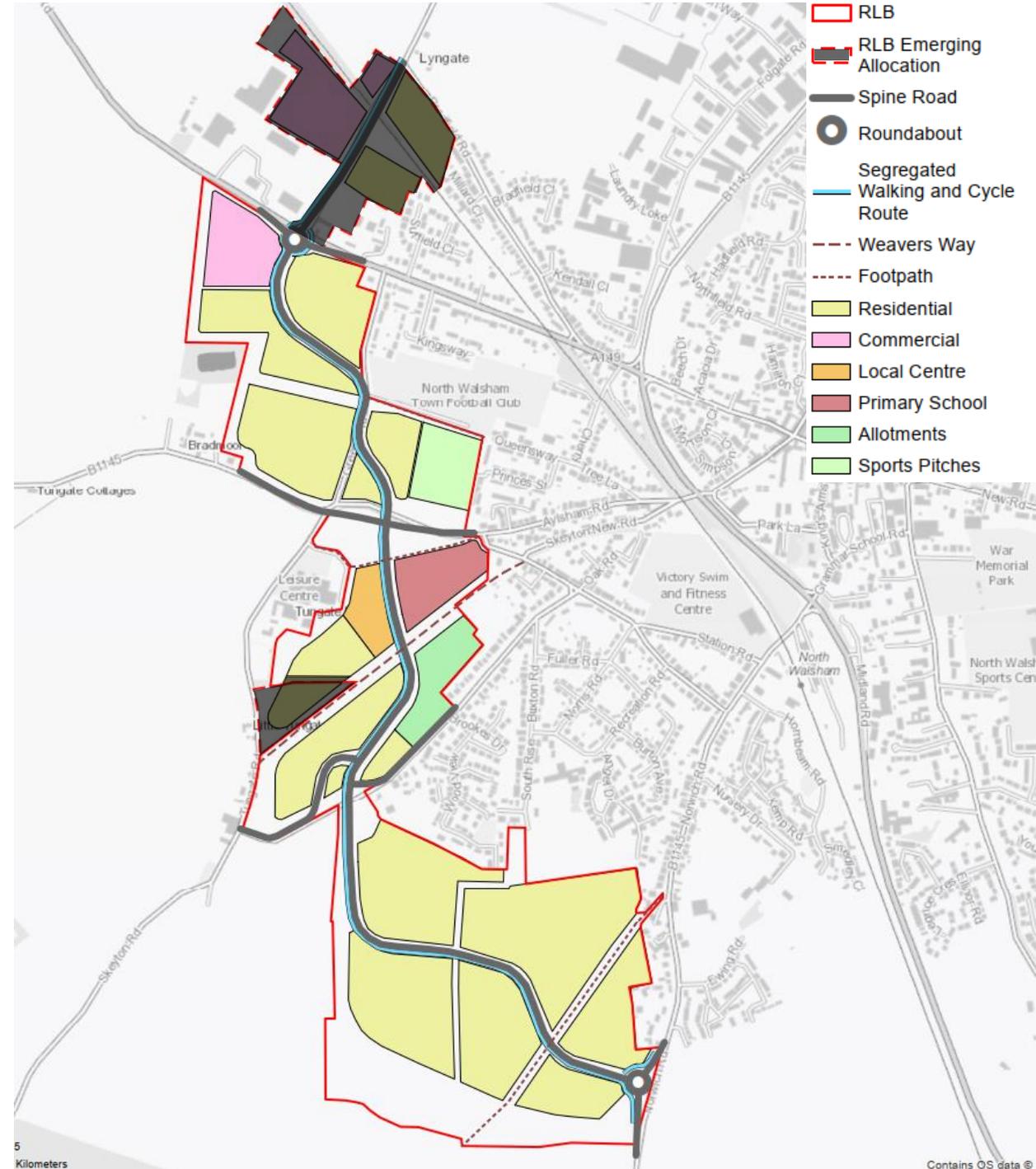
- ✓ Modelling of Development Impacts completed and agreed in principal with Norfolk County Council.
 - ✓ Walking and Cycling Strategy (on and off-site) identified and reviewed together on site with NCC.
 - ✓ Public Transport Strategy identified and integrated within masterplan, supported by NCC.
 - ✓ Offsite highway mitigation needs identified and agreed in principal for North Walsham and Coltishall.
 - ✓ All proposals reviewed in terms of ability to mitigate impacts and deliverability.
-
- Design refinement of offsite mitigation;
 - Transport Assessment currently being finalised;
 - Road Safety Audit for off site proposals to be completed.

What will the Allocation Deliver?

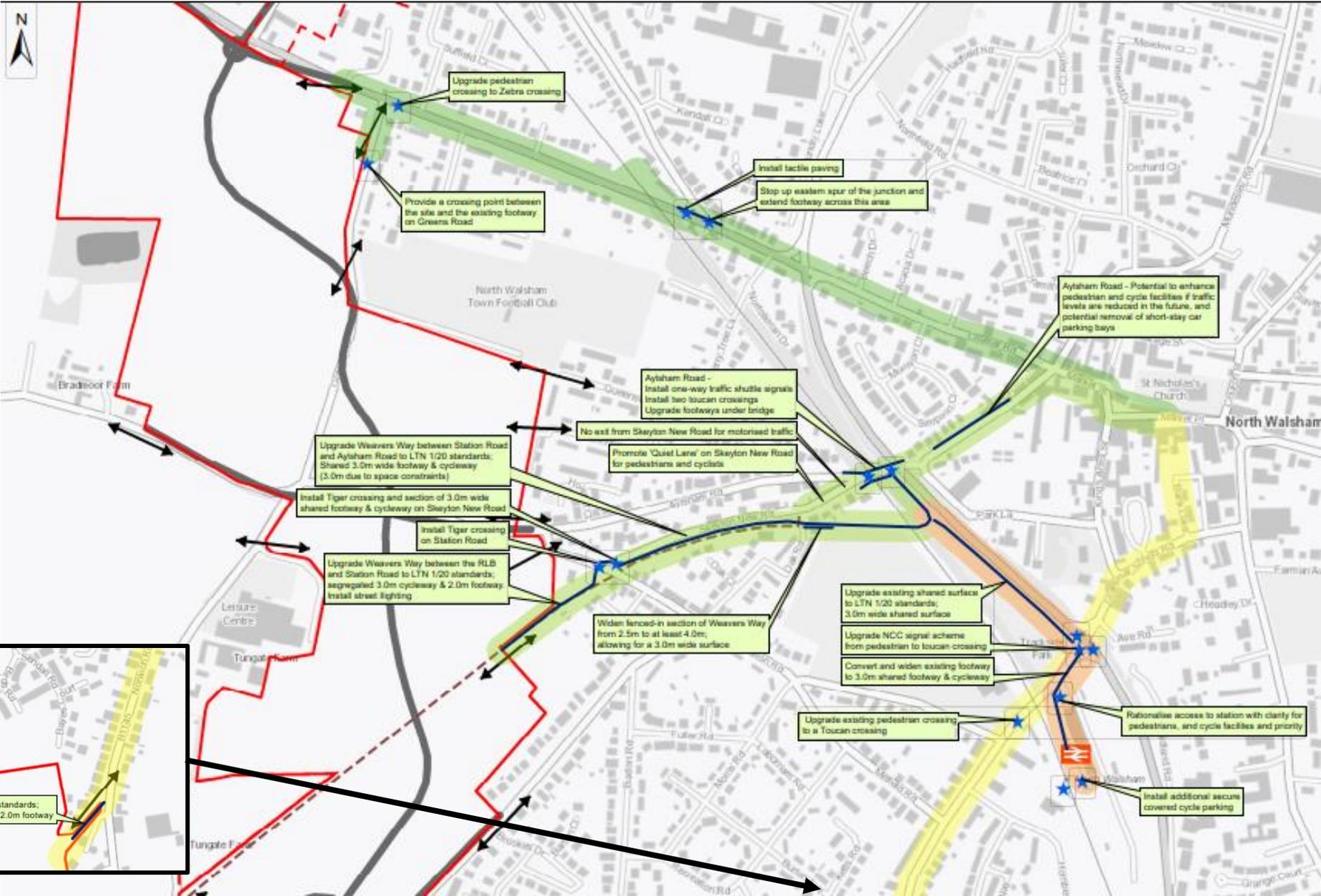
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For Pedestrians and Cyclists

- ✓ A local centre, on site facilities and access to nearby facilities in line with 20 minute neighbourhood ethos.
- ✓ A network of interconnected streets, squares, green corridors, and public spaces which prioritise moving around on foot and by cycle over use of private motor vehicles;
- ✓ Attractive and convenient connections for walking and cycling to adjacent areas;
- ✓ Enhancements of existing PROWS through the site, including Weavers Way;
- ✓ Defined street hierarchy considering how each of the modes will interact, ensuring the access road is not a barrier to permeability.
- ✓ Pedestrian and cyclist facilities integrated with bus routes through and adjacent to the site;
- ✓ Safe active travel routes to the railway station;
- ✓ Increased cycle parking at NW Railway Station, on site Travel Hub and at all public spaces.
- ✓ Enhanced site frontage on existing routes through reduced speed limit, gateway features and pedestrian and cyclist crossings.



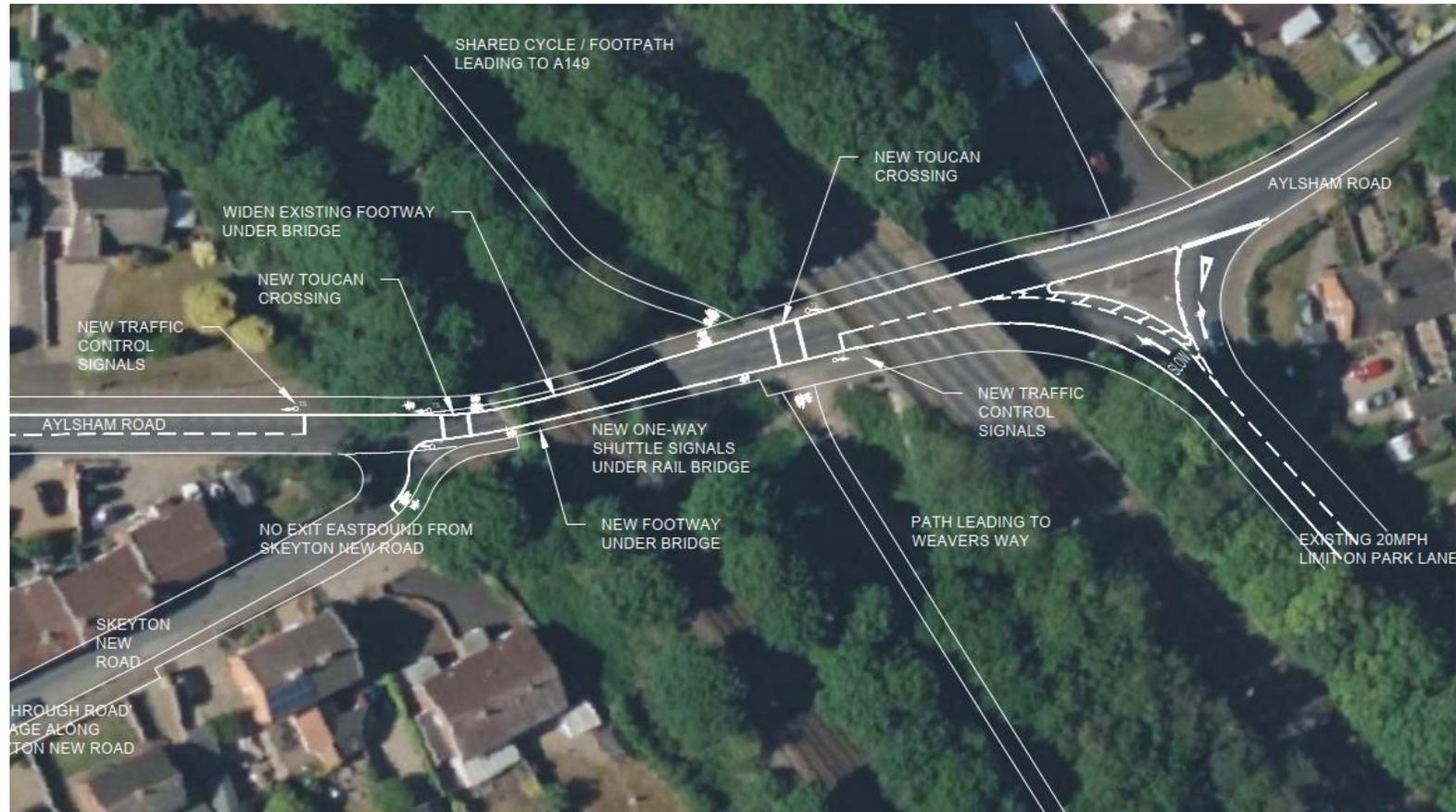
Off Site Pedestrian & Cycle Improvements



LEGEND	
	Proposed Improvement
	Proposed Improvement
	Mobility Corridor 1 (2m wide footway; on-road cycling)
	Mobility Corridor 2 (including off-carriageway cycling)
	Mobility Corridor 3 (2m wide footway; on-road cycling)
	Mobility Corridor Rail Extension (including off-carriageway cycle)
	Walk and Cycle RLB Connection
	Weavers Way
	Link Road
	RLB
	RLB Emerging Allocation

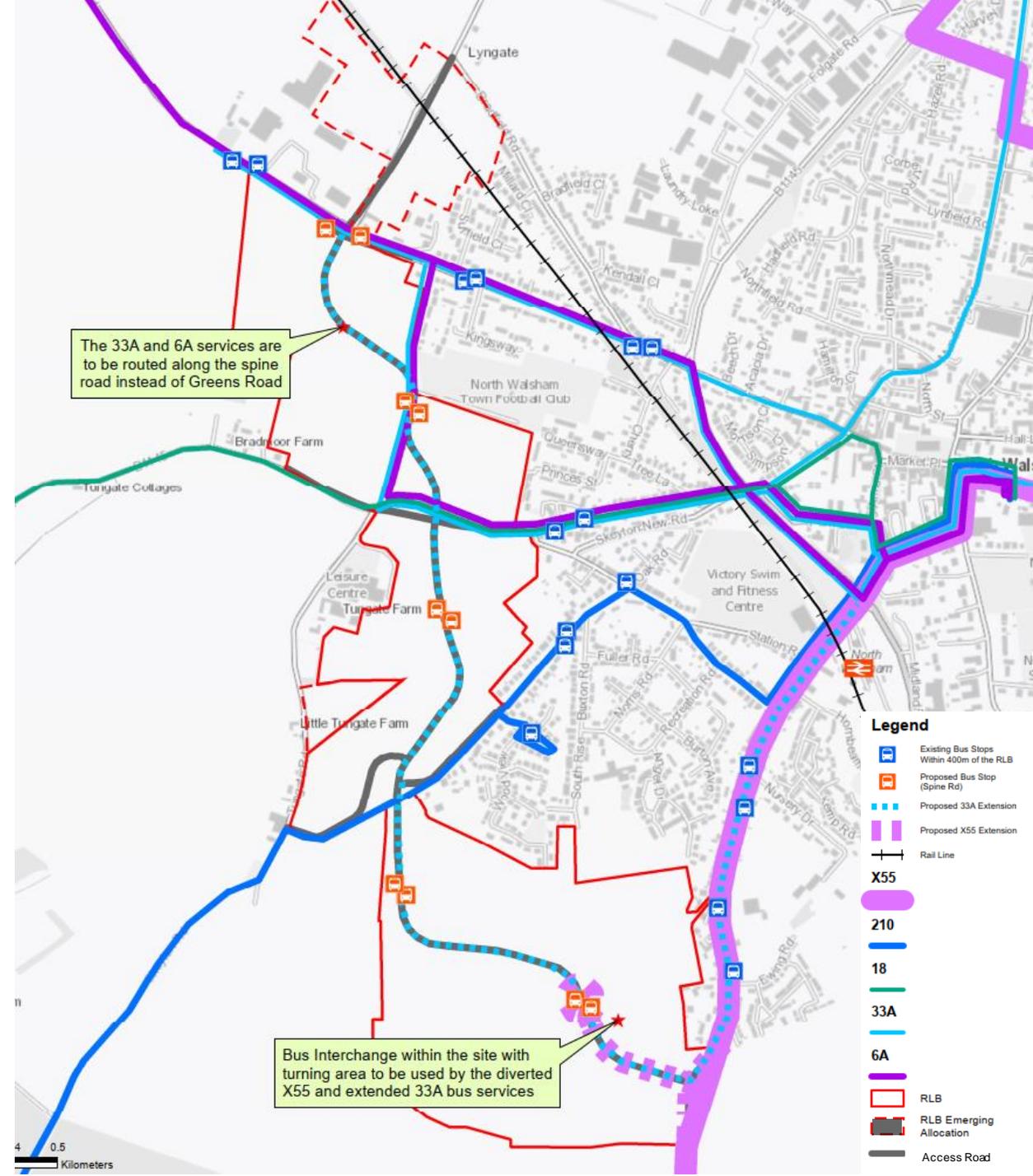
Aylsham Rd – Signalised Alternating One Way Use under bridges

- ✓ Proposed One-way System at Aylsham Rd railway Bridge;
- ✓ Allows for higher side vehicles to continue to access North Walsham but will discourage non-essential through traffic on Aylsham Rd;
- ✓ Proposed closure of Skeyton Rd to through traffic;
- ✓ Allows provision of a footway on the southern side under the bridge;
- ✓ Includes Toucan Crossing from PROW either side of the bridge;
- ✓ Allows widening of existing northern footway under bridge, where pinchpoint exists.



For Public Transport Users

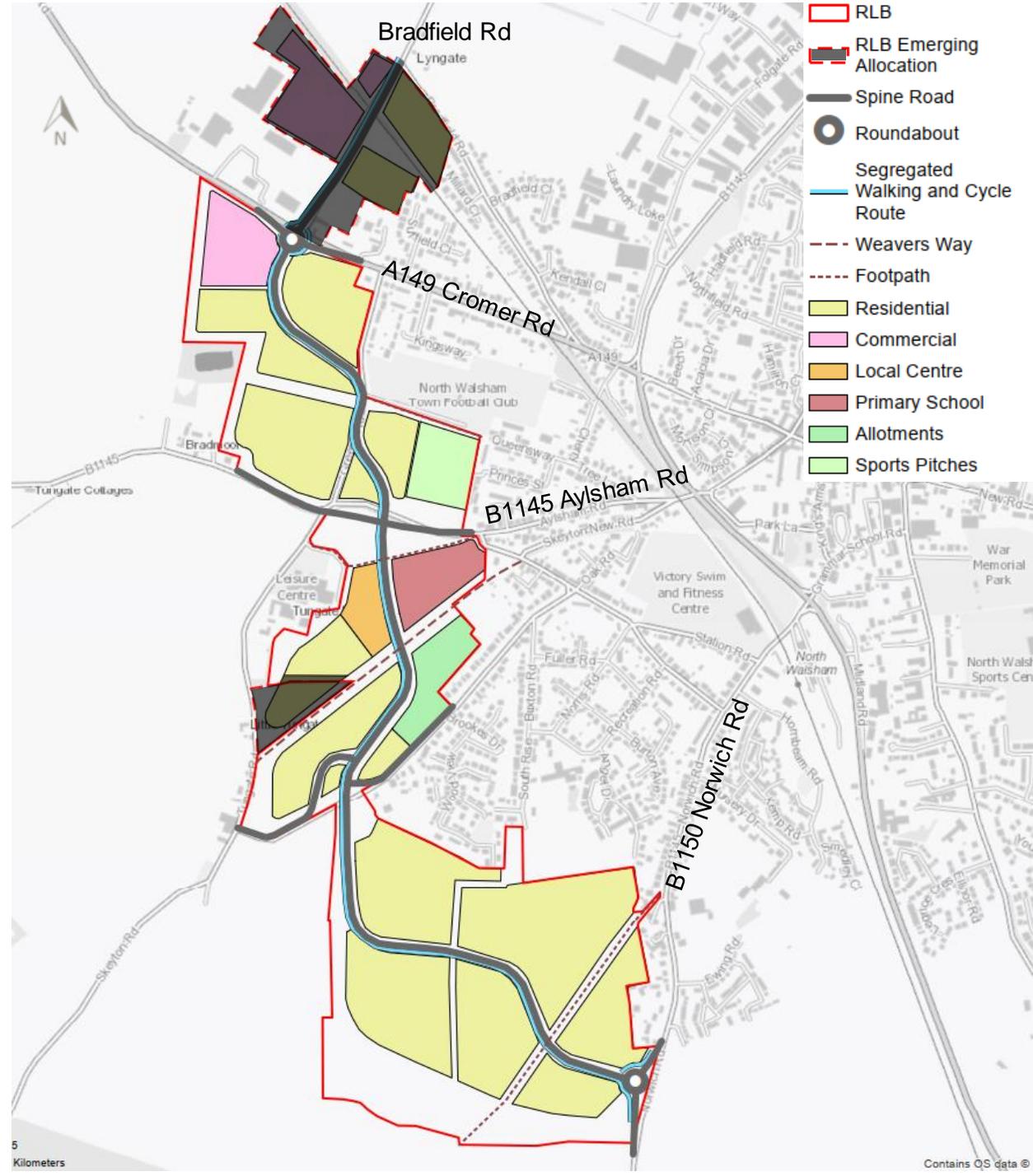
- ✓ Public transport measures on site providing facilities and regular services to/from the town and key services including:
- ✓ On-site travel hub for bus/ travel interchange, to attract express services into the site;
- ✓ Permeability of the site to bus services along the development Access Road;
- ✓ Provision of bus stops along development frontage and within the site with high quality facilities;
- ✓ Proposed bus service enhancements for the local bus services and express services to Norwich; and
- ✓ Access to rail supported through 'Mobility Corridor' cycle improvements and enhanced station cycle parking



North Walsham Western Urban Extension (WUE) : Access Road

- ✓ Delivers an attractive primary residential street through the development with mixed-use frontage usages and segregated cycle paths and footways;
- ✓ Provides access for all transport modes to and through the development site between Norwich Road, Aylsham Rd and Cromer Road, including high-sided vehicles;
- ✓ Delivers greater network resilience in North Walsham;
- ✓ Provides a new route for local traffic to mitigate development impacts;
- ✓ Leads to no significant increase in traffic on Bradfield Road, north of the railway, with only the residential uses north of the railway adding light vehicles;
- ✓ Green Rd will be stopped up and access to the Football Club will be improved; and,
- ✓ Potential to close Skeyton Road as a through route through site.

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Highway Mitigation – North Walsham

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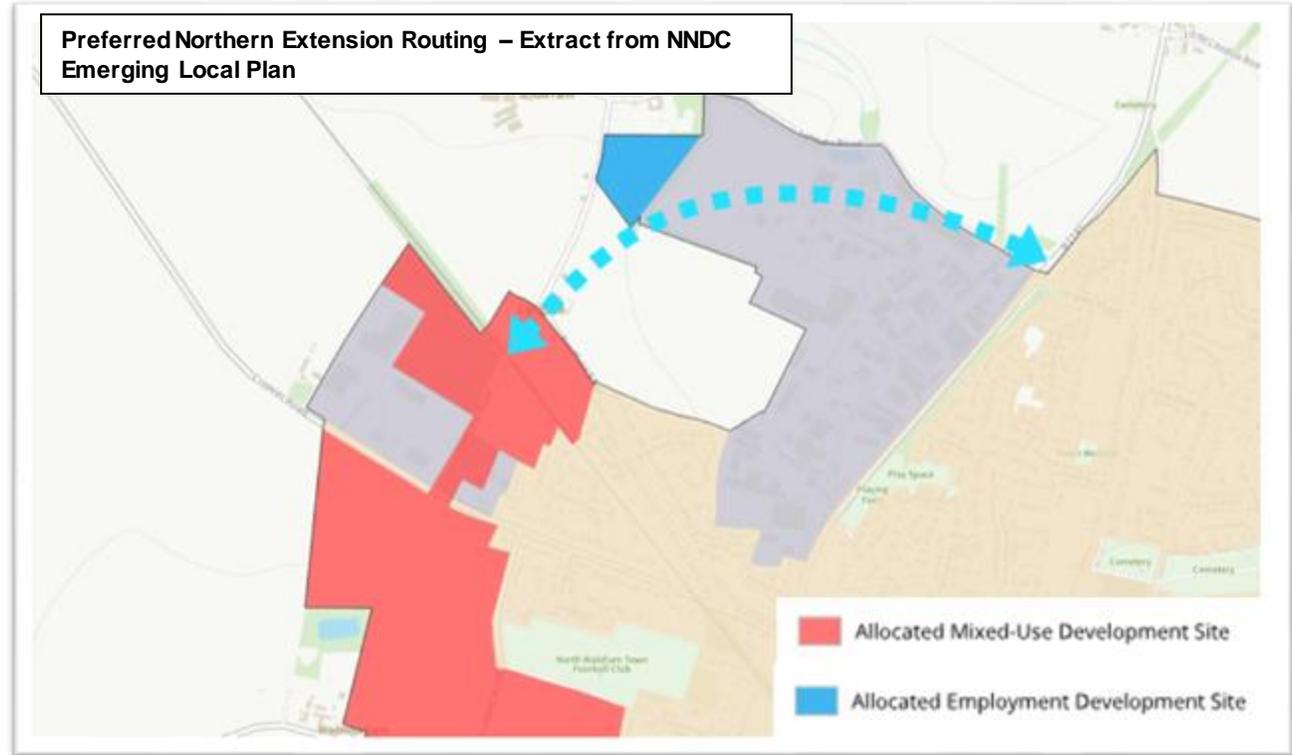
Western Access Road Northern Extension

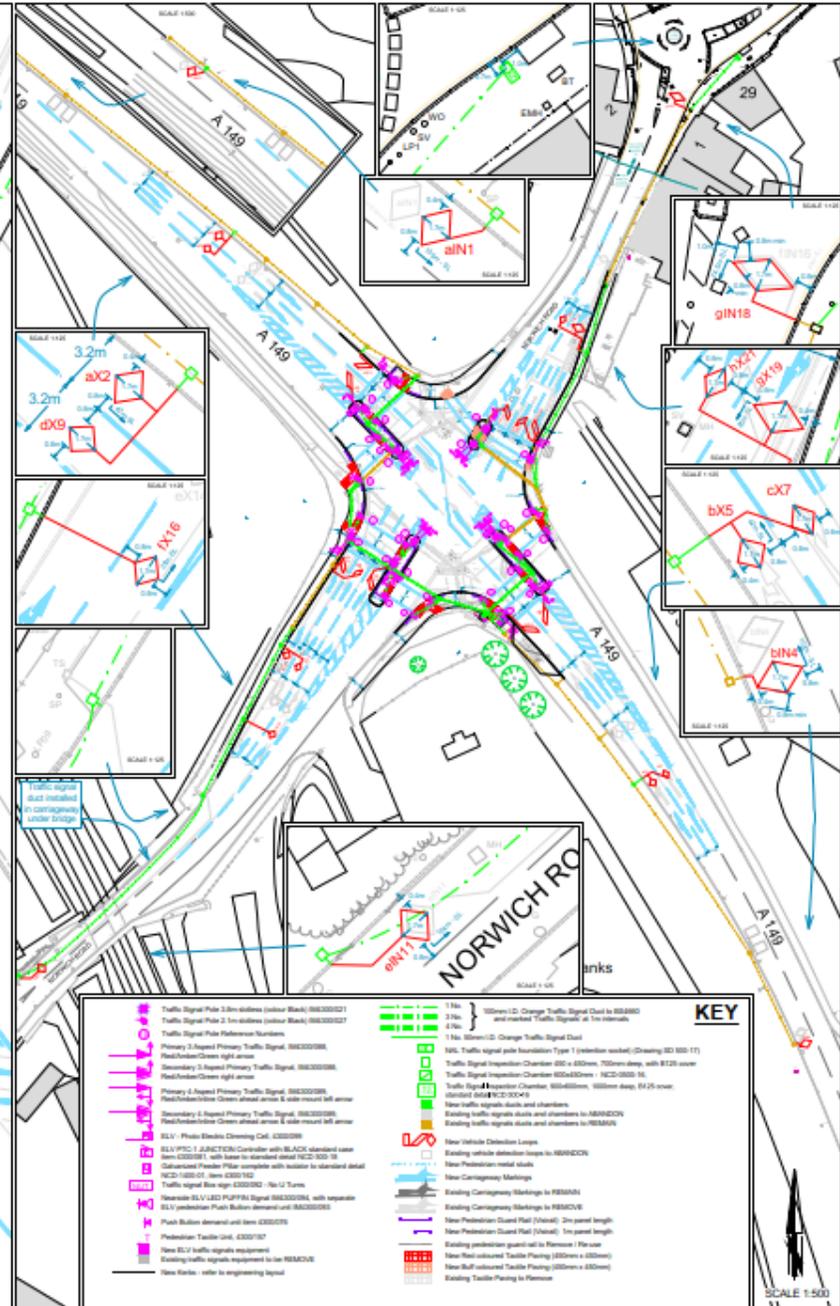
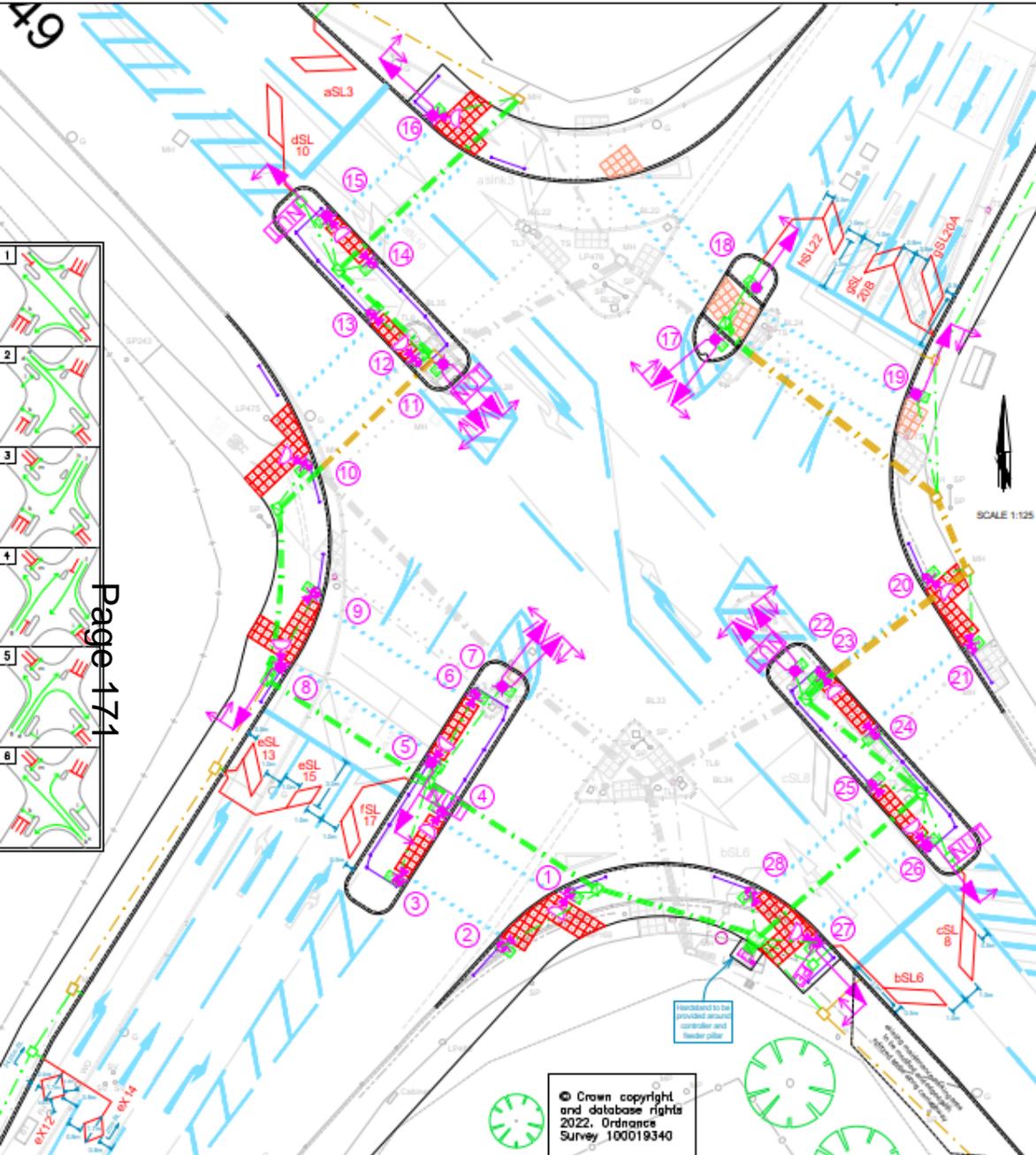
- Cannot be delivered as part of allocation as it sits outside of the allocation/ highway boundary and requires land outside of Consortium control.
- Benefits of proposed Northern Extension will not justify high cost of current preferred scheme (approximately £19.8M), (5% of development traffic, and up to 32 HGVs in peak hours).

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The proposed allocation can and will:

- ✓ Facilitate future delivery of a Northern Extension through the Design Brief and masterplan design;
- ✓ Enhance pedestrian and cycle connections to the North Walsham Industrial Estate;
- ✓ Deliver additional bridge strike mitigation on railway bridge approaches;
- ✓ Deliver traffic management measures on Aylsham Rd to reduce traffic levels, but preserving this route for higher sided vehicles.





Committed Norwich Rd/ A149 Traffic Signal Scheme

Hopkins and Persimmon scheme designed for delivery by NCC. Scheme includes unfunded pedestrian crossings.

Proposals tested to identify if it operates within capacity with allocation land.

No further capacity improvements required.

Unfunded signalised crossings proposed to be funded.

Further pedestrian and cycle improvements identified to improve connectivity to Town Centre and Railway Station

Notes: 1. This drawing is for Traffic Signals PRELIMINARY DESIGN purposes only. Please refer to the latest engineering & bring layout drawing(s) for details of tests, other civil elements and bring details. 2. Temporary signs to TSGCD, appropriate version of diagram 7014 are to be installed on all junction approaches from when the signals become operational for a period of 3 months.

REV	DESCRIPTION	CHECKED	DATE

27/10/2022 DRAFT TARGET COST

SURVEYED BY	INITIALS	DATE
OSAT		2015
DESIGNED BY		
MC		27/02
DRAWN BY		
MC		1922
CHECKED BY		
MJC		1922

DRAWING No. PR3626-TS-008
PROJECT TITLE
North Walkway Norwich Road (A149)
Former HL Foods site, S278 HA08A
SCALE
1:500 & 1:125 @ A1
FILE No.
PR3626-TS

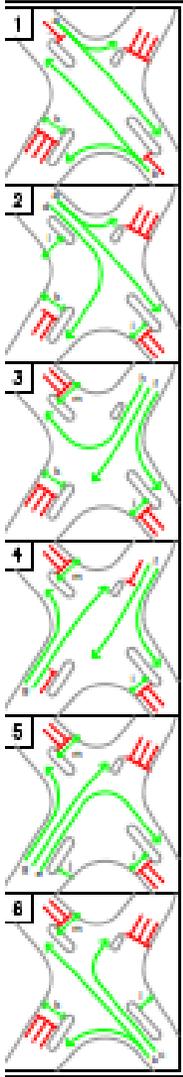
Committed Norwich Rd / A149 Traffic Signals - LinSig Results

Scenario	Arm	AM Peak Hour		PM Peak Hour	
		MMQ (pcu)	Max DoS	MMQ (pcu)	Max DoS
036 Do Something Demand Traffic Flows	Norwich Road NE	6.6	73%	7.4	75%
	A149 SE	8.4	75%	12.7	78%
	Norwich Road SW	12.5	73%	12.7	78%
	A149 NW	10.0	73%	11.2	79%

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Conclusions:

- Proposed Scheme operates well within desirable minimum limits, with surplus capacity to cater for the proposed development.
- Scope to improve scheme design for cyclists.
- Scope for junction to accommodate traffic displaced from elsewhere, eg Aylsham Road.

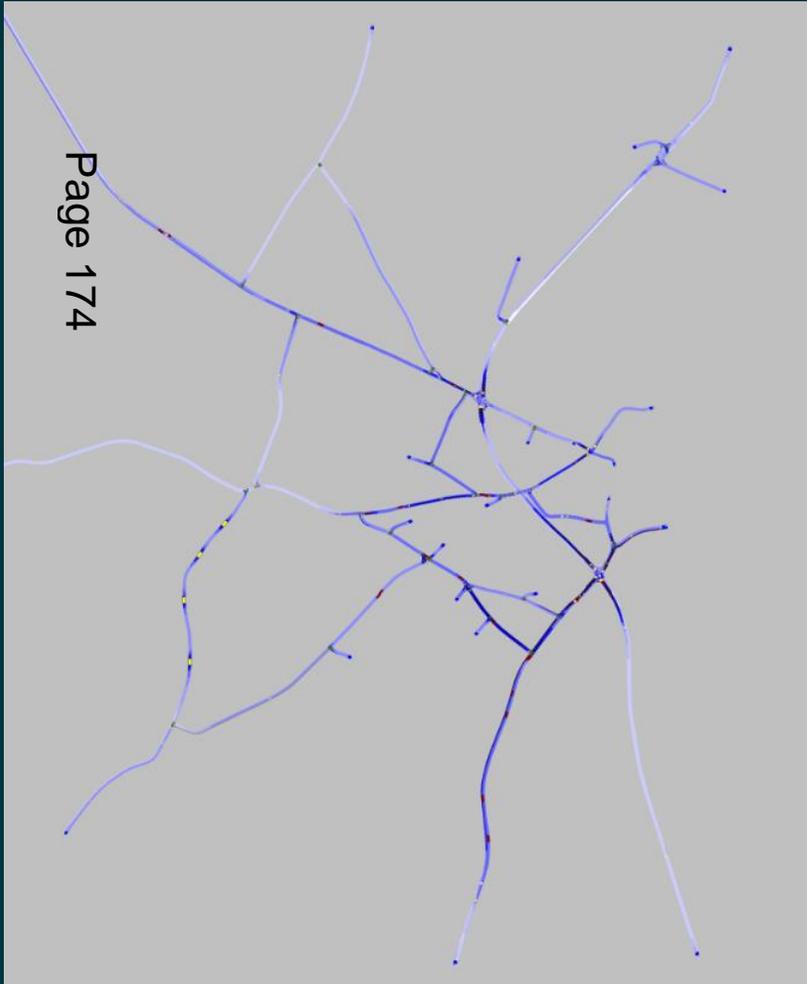


Conclusions – North Walsham

- Traffic Impact Analysis identifies that with the proposed new link road (Cromer Rd to Norwich Rd and committed capacity improvements at the Norwich Rd/ A149 traffic signals, residual traffic impacts are not severe.
- The proposed Link Rd accommodates HGV and general traffic encouraging greater use of Cromer Rd, reducing reliance on Aylsham Rd.
- Targeted improvements have been identified to address key gaps/ shortfalls on pedestrian and cycle facilities on Cromer Rd, Aylsham Rd, Skeyton Road, Weaver's Way, A149 and Norwich Rd. Improvements identified have been reviewed on site and are viewed as being deliverable, within highway land and site constraints.
- A one-way traffic signal scheme incorporated toucan crossings at Aylsham Rd railway bridge will improve pedestrian and cycle provision and discourage through traffic on Aylsham Rd.

VISSIM Modelling Results – North Walsham

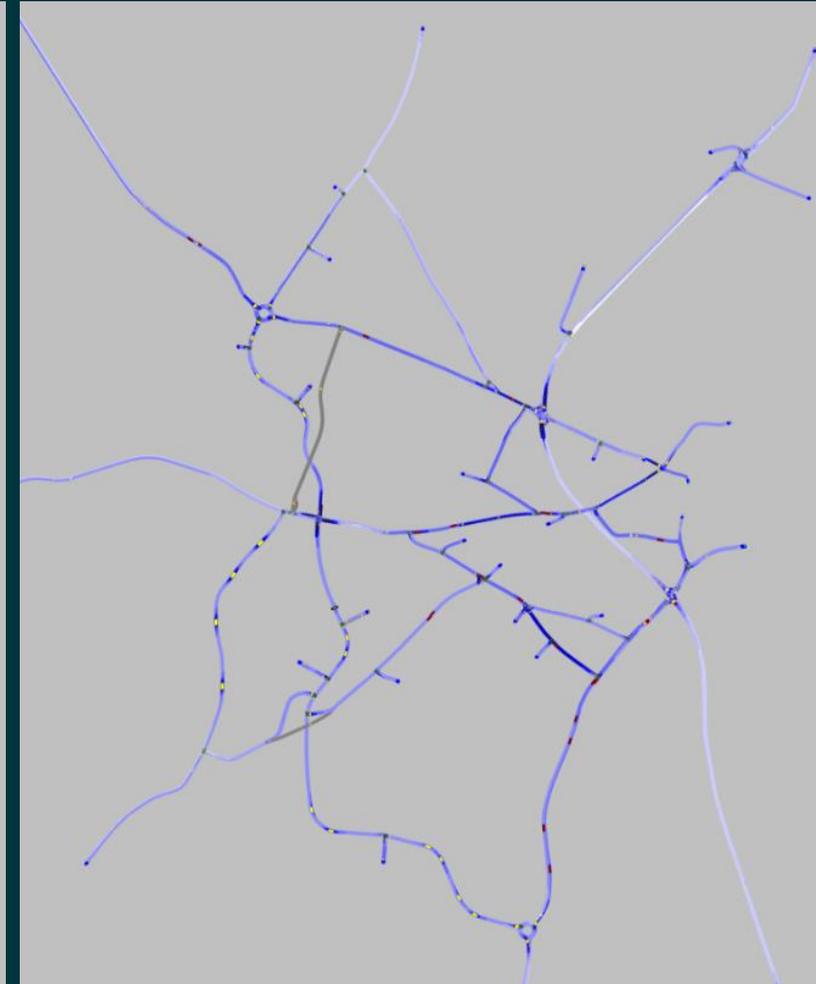
2036 PM Peak DM



2036 AM Peak DS



2036 AM Peak DS Mit



Mitigation - Coltishall

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VISSIM– Coltishall Mitigation

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Obstructive parking

Norwich Rd / B1354

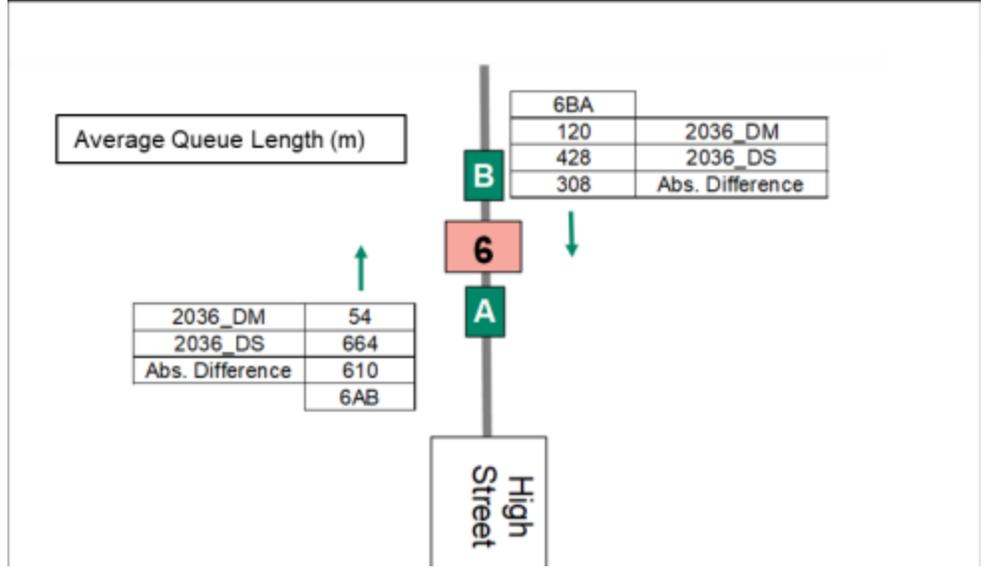
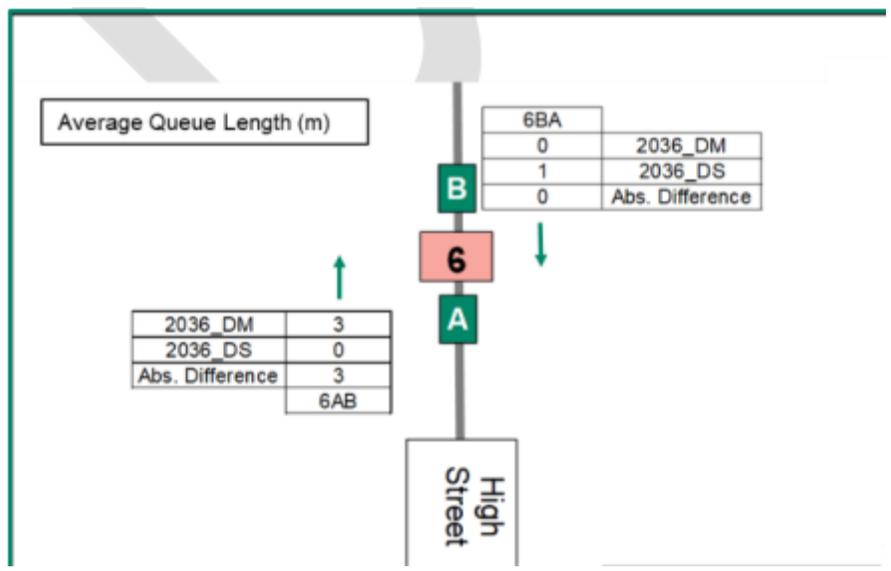


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- New right turn lane for three vehicles required
- Crossing Point to be relocated

Results from VISSIM Modelling – Provision of Bus Stop Cage in place of parking

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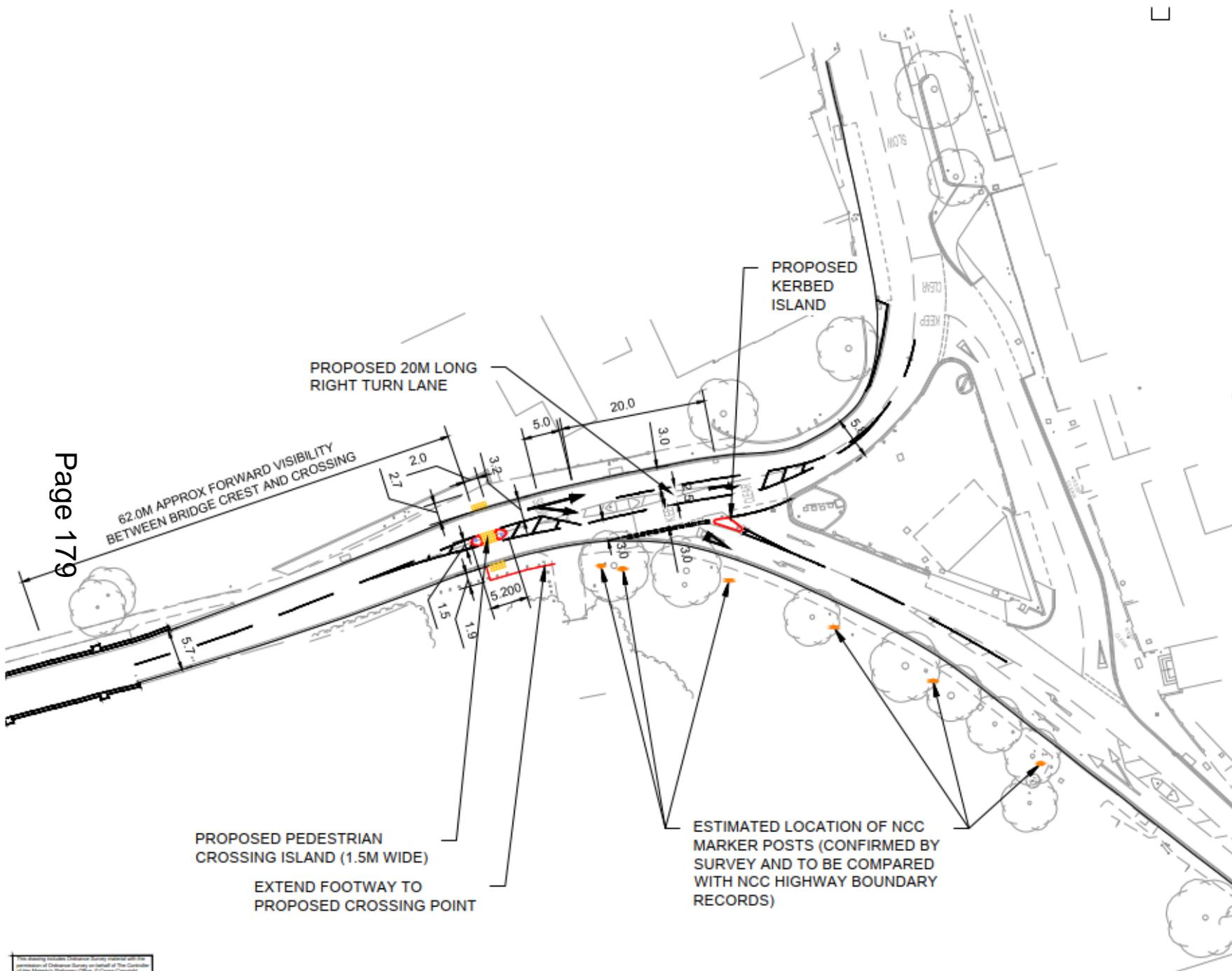
2036 Do Something with Mitigation				
Link	AM		PM	
	Queue Length Average (m)	Vehicle Delay Average (s)	Queue Length Average (m)	Vehicle Delay Average (s)
106-34 (High Street Southbound)	0.52	3.41	0.29	2.99
106-15 (High Street Northbound)	0.02	1.33	0.54	2.83

Removal of parking removes the queuing on High Street in both the DM and DS scenarios

Coltishall- Norwich Rd/ B1354 Junction Improvements

- New Right Turn Lane
- Relocated crossing point
- Design deliverability tested against highway boundary and topographical survey.
- NCC Supportive

Safety Audit to be carried out.



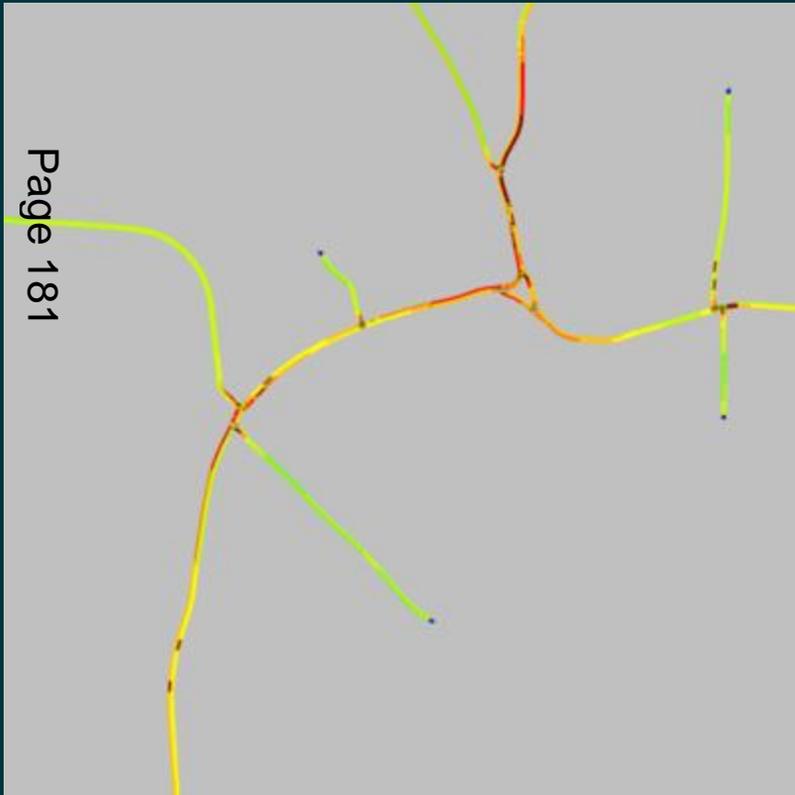
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Conclusions – Coltishall

- Traffic Impact Analysis identifies that with the proposed right turn lane into B1354, and provision for formalising bus stop and preventing parking at the War Memorial, residual traffic impacts are not severe.
- The proposed physical improvements are deliverable within available land, subject to checking against topo survey.

VISSIM Modelling Results – Coltishall

2036 PM Peak DM



2036 PM Peak DS



2036 PM Peak DS Mit



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