

Planning Policy & Built Heritage Working Party



Please contact: Lauren Gregory

Please email: Lauren.Gregory@north-norfolk.gov.uk

Please direct dial on: 01263 516108

Wednesday, 2 October 2024

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 **Thursday, 10 October 2024 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 M Hankins, Cllr A Varley, Cllr M Batey, Cllr H Blathwayt, Cllr A Brown, Cllr N Dixon, Cllr P Fisher, Cllr P Heinrich, Cllr V Holliday, Cllr L Paterson, Cllr J Punchard and Cllr J Teye

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

Chief Executive: Steve Blatch

Tel 01263 513811 **Fax** 01263 515042 **Minicom** 01263 516005

Email districtcouncil@north-norfolk.gov.uk **Web site** www.north-norfolk.gov.uk

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 18th July 2024.

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. LOCAL PLAN EXAMINATION: MAIN SOUNDNESS ISSUES & ACTION PLAN

15 - 216

REPORT TITLE LOCAL PLAN EXAMINATION: MAIN SOUNDNESS ISSUES & ACTION PLAN	
Executive Summary	The purpose of this report is to update Members in line with the Inspector's post hearing letter and seek endorsement of the Action Plan and consultation arrangements moving forward.
Options considered.	An option exists not to accept the Action Plan in full, and to only take forward parts and/or add through additional growth options.
Consultation(s)	Earlier iterations of the local plan

Recommendations	<p>Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:</p> <p>I. the draft Action Plan is endorsed and taken forward to the timelines outlined;</p> <p>II. the updated evidence and background papers are endorsed;</p> <p>III. the consultation arrangements and communication Plan are endorsed;</p> <p>IV. that delegated authority is given to the Acting Planning Policy Manager in consultation with the Planning Portfolio Holder to finalise the Action Plan and consultation material and continue to respond to the Inspectors questions during the Examination period and hearing(s)</p>
Reasons for recommendations	To address the inspectors' main concerns relating to soundness
Background papers	<p>Further supporting evidence can be found in the examination library www.north-norfolk.gov.uk/localplanexamination</p>

7. PLANNING REFORM UPDATE

217 - 224

REPORT TITLE	Planning Reform Update
Executive Summary	The purpose of this report is to update Members in relation to planning reform with regard to the Council's response to the Government's consultation on proposed reforms to the NPPF.
Options considered.	None.
Consultation(s)	N/A
Recommendations	For information only
Reasons for recommendations	N/A

Background papers	Further supporting information and consultation documents can be found here
--------------------------	---

8. **NPPF CONSULTATION RESPONSE** 225 - 242

9. **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.”

PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Thursday, 18 July 2024 at the Council Chamber - Council Offices at 10.00 am

Committee	Cllr M Hankins (Chairman)	Cllr A Varley (Vice-Chairman)
Members Present:	Cllr N Dixon	Cllr P Fisher
	Cllr P Heinrich	Cllr J Toye

Officers in Attendance:	Acting Planning Policy Manager
	Senior Planning Officer
	Democratic Services Officer – Regulatory

Apologies for Absence:	Cllr M Batey
	Cllr H Blathwayt
	Cllr A Brown
	Cllr V Holliday
	Cllr L Paterson
	Cllr J Punchard

1 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr J Punchard, Cllr H Blathwayt, Cllr L Paterson, Cllr V Holliday, Cllr M Batey, and Cllr A Brown.

2 PUBLIC QUESTIONS

None received.

3 MINUTES

The minutes of the Planning Policy & Built Heritage Working Party meeting held Monday 13th November 2023 were approved as a correct record.

4 ITEMS OF URGENT BUSINESS

None.

5 DECLARATIONS OF INTEREST

Cllr P Fisher declared a non-pecuniary interest in item 6, he is the Local Ward Member for Wells-next-the-sea.

6 WELLS-NEXT-THE-SEA NEIGHBOURHOOD PLAN MAKING REPORT

- a. The Chairman welcomed the Acting Planning Policy Manager to his new role.
- b. The Acting Planning Policy Manager introduced the Officers report and advised and noted the history and timeline behind the Wells Neighbourhood Plan. He highlighted some of the key aspects of the Plan including a principal occupancy restriction, inclusion of an allocated site for affordable housing, a dedicated policy to support community land trust development, detailed character appraisal and land code, identified local green spaces, specific

policies on the beach area and harbour area, amongst other policies.

- c. Cllr P Henrich endorsed the Wells Neighbourhood Plan and proposed acceptance of the Officers recommendation.
- d. Cllr J Toye welcomed the Wells Neighbourhood Plan and seconded the Officers recommendation. He asked how the Plan would impact decision making at Development Committee.
- e. The Acting Planning Policy Manager advised that Planning Officers would have regard to the Plan in their report and recommendations, and appropriate references would be made to relevant policies.
- f. Cllr P Fisher, Local Member for the Wells ward, thanked the Town Council and its Working Party for their efforts in developing the Plan, noting the group's efforts to work on the Plan through the pandemic.
- g. The Chairman commended the Plan and acknowledged that learnings from this Plan could and would be used elsewhere.
- h. The Acting Planning Policy Manager advised that the principal occupancy restriction policy would be used as an example template to other Town and Parish Councils interested in incorporating such a policy within their own neighbourhood plans. It would be beneficial for there to be standardised neighbourhood plan policies across the district.

RESOLVED

Recommendation to Cabinet:

1. In order to comply with the statutory timeframe, the Planning Policy & Built Heritage Working Party recommends to the Leader to make a delegated decision on behalf of Cabinet, that having been subject to successful local referendum;

a. The Wells-Next-The-Sea 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) as soon as practical and within the 8 week statutory time frame and no later than 30th August 2024;

b. The issuing of the Decision Statement required under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in order to bring it to the attention of the qualifying body, and the people who live, work and or carry out business in the Neighbourhood Area, is delegated to the Director of Planning in conjunction with the Acting Planning Policy Manager.

7 NORTH WALSHAM DEVELOPMENT BRIEF

The Senior Planning Officer introduced North Walsham Development Brief, set out a brief history of the Brief, and spoke to developments which had taken place since the last Working Party meeting following public consultation and Local Plan examination. Once accepted, the North Walsham Development Brief would inform any subsequent planning application, or pre-application, and also help guide in its

determination.

The Senior Planning Officer noted there were three different policy areas on the site, North, South and Central, each with different and distinct characteristics within existing built form.

Key principles of the Brief include:

- Sustainability & Green Infrastructure; including allotment provision, landscaping to mitigate any potential impacts on the wider landscape and use these elements to help enhance bio-diversity net gain, introduction of a new town park, and comprehensive natural landscape buffering to the south. The Brief endorsed the use of low carbon technologies, use of native plant species, cycling and footpath networks and commits to the use of future home standards as identified in local plan policy.
- Employment - The site was required to provide 7 hectares of new employment land to create new employment opportunities. The majority of employment provision had been allocated to the northern character area, though it was noted that there were employment generating opportunities elsewhere on the site, specifically the central area.
- Community Focused – The site was required to provide community infrastructure including a new primary school, local centre, allotments, open space and play areas, accessible open spaces, sports pitches and enhancements to weaver's way to improve connectivity. In addition, self-build plots would be included throughout the development, and the site would be required to provide for 300 units of elderly care provision (or 200 dwellings equivalent) as set out in the site-specific policy.
- Access & Movement – The site was required to provide a link road through the development (as discussed at prior meetings). The Brief also included provision of new cycle and footpath linkages and new opportunities for public transport including a bus interchange in the southern character area.

The Senior Planning Officer detailed the qualities reflected in the design code for each of the three-character areas.

- Northern Character Area – This character area was where most of the employment land will be focused, in addition to sports provision; located within close proximity to the existing football club. It would also include residential development, open space and play areas.
- Central Character Area – The main core of the site. This character area included provision of a new primary school, allotments, residential developments, open space and connectivity with Weavers Way.
- Southern Character Area – This area of the site focused more on green infrastructure, contained the transport hub with turning area for buses, and inclusion of play areas.

The Senior Planning Officer outlined next steps and confirmed more detail would be offered within the design code. The production of the design code was a policy requirement and would require approval by the Council before the determination of

an application. Specific details regarding materials, design elements and GI strategy would be contained in the design code. Work on the Code had commenced, and a draft version would be presented to the Working Party for consideration in due course.

It was anticipated that an outline application would be submitted by autumn 2024. In addition, the site promoters were potentially seeking to host an additional public event in North Walsham.

Members Debate

- a. Cllr P Heinrich, Local Member for North Walsham East, considered the Brief to be compressive and high quality, welcomed the three-district character area concept, provision of extensive open space and landscaping, and environmentally considerate housing. He noted that the link road would extend over the railway, providing the opportunity in future to extend the road into the industrial estate, though acknowledged this was not feasible at present despite the wishes of the Town Council and some residents.

He shared in the scientism expressed by several residents about the water supply, given the existing water tower was built to serve the town when its population was 5,000, and now serviced 13,000+ residents. Cllr P Henrich asked what plans and arrangements Anglian Water had made to increase capacity.

- b. The Acting Planning Policy Manager advised that Anglian Water were supportive of the North Walsham West Extension and were content they could accommodate future demand, though was uncertain of specific investment details. He confirmed that the National Standard for calculation of water use would apply, and noted Anglian Water were lobbying for more restrictive water supply in development across the East.
- c. Cllr P Henrich also considered foul drainage to be an area of concern and enquired if the Marshgate works would be expanded, how this might impact the Gimingham pumping station, and what impact this would have with respect of pollution on Mundesley Beach.
- d. The Acting Planning Policy Manager relayed Anglian Waters comments that they intended to provide an on-site pumping station which would connect to foul sewage upstream. The Policy would require submission of a strategy to address foul and surface water, more details would be contained in the actual proposal itself.
- e. Cllr P Heinrich asked how many self-build plots would be included.
- f. The Acting Planning Policy Manager noted the requirement in the Plan requiring larger sites to provide 5% custom build plots. Construction of the custom build plots would depend on the uptake.
- g. The Senior Planning Officer noted that in earlier iterations of the Brief, the Consortium had indicated where they would like for the self-build plots to be located. However, the Council weren't satisfied with the proposed locations, and this had been removed from later versions. Further details regarding self-build plot location would be contained in the design code.

- h. Cllr P Henrich asked for further details regarding care provision.
- i. The Acting Planning Policy Manager advised there was flexibility in the nature of care provision, whether that be a dedicated care home, nursing home or appropriate dwellings. Details would be provided at the planning application stage.
- j. Cllr P Henrich endorsed the flexible approach outlined and concluded that it was uncertain at this stage what the demand would be for different types of accommodation in coming years. He was keen to ensure that elderly accommodation was well integrated within the community.
- k. The Senior Planning Officer confirmed further detail would be provided through the design code.
- l. Cllr P Henrich noted description of a 'Country Park' within the Brief and reflected this was not land owned by the Consortium.
- m. The Senior Planning Policy Officer commented that there had been some confusion of the description of a 'Town Park' vs 'Country Park'. He confirmed the Town Park would be located centrally, north of the local centre. The Council had expressed its wish for the Country Park description to be removed and replaced with wording of 'Strategic Green Infrastructure'. References to Country Park should have been removed, and this would be amended going forward.
- n. Cllr P Heinrich noted medical services were not proposed within the Brief and commented that discussions were ongoing elsewhere for the provision of a single large medical centre.
- o. The Acting Planning Policy Manager advised that the policy did not require medical provision, but the Brief established that provision could be provided in the Central Area if this were so desired.
- p. Cllr P Heinrich proposed acceptance of the Brief.
- q. Cllr J Toye thanked the Local Member for the local context offered. He asked for specific detail of care facilities and how the policy worked.
- r. The Acting Planning Policy Manager affirmed that the amended policy before the Inspector was for 200 dwellings (or equivalent) of specialist elderly persons accommodation. In practice, the housing team would work with the applicant to determine the actual type of accommodation based on the need at the time. It was noted any development wouldn't start till 2027/2028 (dependent on planning permission being granted) and likely not complete till 2040, through various different phases.
- s. Cllr J Toye seconded the motion. He believed that historic development of Stevenage had in part been successful because of long-term visualisations, and considered this to be a useful tool in demonstrating how the appearance and character of an area may change over time with later additions as residents move and demands change.
- t. Cllr P Heinrich noted the Brief had been refined through discussions and local consultations and praised the former Planning Policy Manager for his

work on developing the scheme. He agreed that the development would evolve over its lifetime as the needs and expectations of the town changed.

- u. Cllr N Dixon referenced P.21 of the agenda, and the public feedback offered; specifically that relating to the b1150 and the impact of the development on Coltishall and Horstead. He asked if the feedback had adequately been reflected in the Brief and if this should be a consideration.
- v. The Acting Planning Policy Manager advised that the Brief considered the site-specific area, and that it was widely acknowledged that offsite mitigation was required which had been written into the policy. He noted that during the examination hearing a detailed discussion was had regarding the b1150 and the impact to Coltishall. The promoters had submitted mitigation proposals which demonstrated delivery of the site, and it was detailed in the policy that off-site mitigations be agreed and delivered as part of any planning application (this had been endorsed by the Highways Authority and NNDC).
- w. The Senior Planning Officer confirmed that site specific details would be offered through the design code, which was to follow. He commented that Bidwells were engaging with the Highways Authority with regards the outline application and noted extensive work had already been undertaken.
- x. The Acting Planning Policy Manager reassured the Working Party that the Inspector was supportive of the policy that off-site mitigations be delivered at the beginning of the scheme.
- y. Cllr N Dixon considered that the success of this scheme would be measured over decades and should the aforementioned constraints within that area not be appropriately addressed, then the success of North Walsham West would be blighted. He stressed the importance of clear and deliverable linkage between the development and improvement to the transport route, and delivery in a timely manner.

RESOLVED

Recommendation to Cabinet:

The Development Brief is endorsed as a material consideration in order to assist in the development and determination of applications in relation to the emerging site allocation, Land West of North Walsham (NW62/A)

Prior to Cabinet, authority to make further minor changes to the Development Brief is delegated to the acting Planning Policy Manager.

- a. The Acting Planning Policy Manager summarised the history of the Local Plan and Examination Hearings (which took place earlier in the year). He confirmed that the hearings were well attended by interested parties, and in preparation for the hearings the team had undertaken a series of statements of common ground with third parties.

Principally, much of the debate at examination focused on the timeline of the Local Plan and when the Plan should start, as well as the Council's deviation from the standard methodology in calculating housing numbers.

Subsequent changes to the NPPF now required Local Authorities to demonstrate a 5-year housing land supply, should the Inspector be satisfied with the evidence produced, the Council would then not need to demonstrate such evidence in the following 5 years.

He advised that the Inspector considered the Spatial Strategy in detail. The Acting Planning Policy Manager was of the opinion that the Inspector would likely request the Council include more small villages within the Spatial Strategy, though this was yet to be confirmed.

Nutrient Neutrality was also discussed in detail, and work was undertaken to engaged with developers in this regard.

As expected, North Walsham West was discussed at length, with the Inspector allowing objectors time to voice their concerns to the scheme, ensuring a fair hearing.

The Acting Planning Policy Manager felt the Council represented itself well and was well supported by the County Council and strategic partners including Anglian Water.

The Inspector's initial letter was still awaited, following which the Council and Inspector would exchange correspondence back and forth to clarify the scope of the suggested changes. Receipt of the letter had been delayed as a consequence of the General Election.

- b. Cllr P Heinrich noted recent press reports on the governments latest proposals regarding the requirement for up-to-date Local Plans, he understood NNDC may be immune from coming changes as the emerging plan was well advanced.
- c. The Acting Planning Policy Manager advised that although the government had indicated changes to come, much of the rhetoric remained the same, with a drive for Local Plans to be in place. He confirmed that the emerging Local Plan was considered under the transitional arrangements of the NPPF, and that it was clear that the new government wished to update the NPPF – with the reintroduction of the prescribed housing target. He hoped changes to the NPPF would not undermine the Local Plan process. A new Planning and Infrastructure Bill was expected, considering national planning policy statements, and Nutrient Neutrality was also expected to be scrutinised and amended.
- d. Cllr P Heinrich further noted national debate surrounding windfarms.
- e. The Acting Planning Policy Manager advised that the Secretary of State for

Energy Security and Net Zero (Ed Miliband) issued a ministerial statement on the 8th of July which reversed the perceived national policy on the stoppage of onshore wind development – which consequently changed the NPPF and would result in changes to the emerging Local Plan. Historic England had raised concerns regarding the proliferation of wind farms in North Norfolk. Discussions had taken place with Historic England, with revised maps presented to the Inspector of wind farm exclusion areas.

- f. Cllr N Dixon understood the Inspector was expected to accept the major modifications proposed in the emerging Local Plan and reflected that the major modifications would be subject to further public consultation. He asked when those consultations would take place.
- g. The Acting Planning Policy Manager advised that first, the Council needed to receive the Inspectors initial letter which would highlight any areas of concern with regards soundness, or areas which required further work (which would become main modifications). The Council would then produce the necessary work on the back of the Inspectors letter and produce a final schedule of modifications, which would be consulted upon (the consultation being a minimum of 6 weeks). It was highly likely another examination hearing would be required to examine those areas before receipt of the Inspectors final report. The Acting Planning Policy Manager was hopeful that the Plan would still be adopted this year, and affirmed this was the timeline he and the team were working to. The timeline estimate would be refined upon receipt of the Inspectors initial letter when it was better understood what work was required.
- h. The Chairman thanked the Acting Planning Policy Manager for his and the teams work and welcomed the opportunity to consider the amendments suggested by the Inspector.
- i. The Acting Planning Policy Manager offered an update to the 5-year housing land supply, and advised the emerging calculation showed that the Council were still unable to demonstrate a 5-year housing land supply. The December 2023 version of the NPPF introduced the option of producing a 4-year housing land supply, however the emerging figures showed that the Council were unable to demonstrate this either. It was uncertain if the December 2023 NPPF changes would be reversed by the new government.

9 EXCLUSION OF PRESS AND PUBLIC

The meeting ended at 11.22 am.

Chairman

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.
--	---

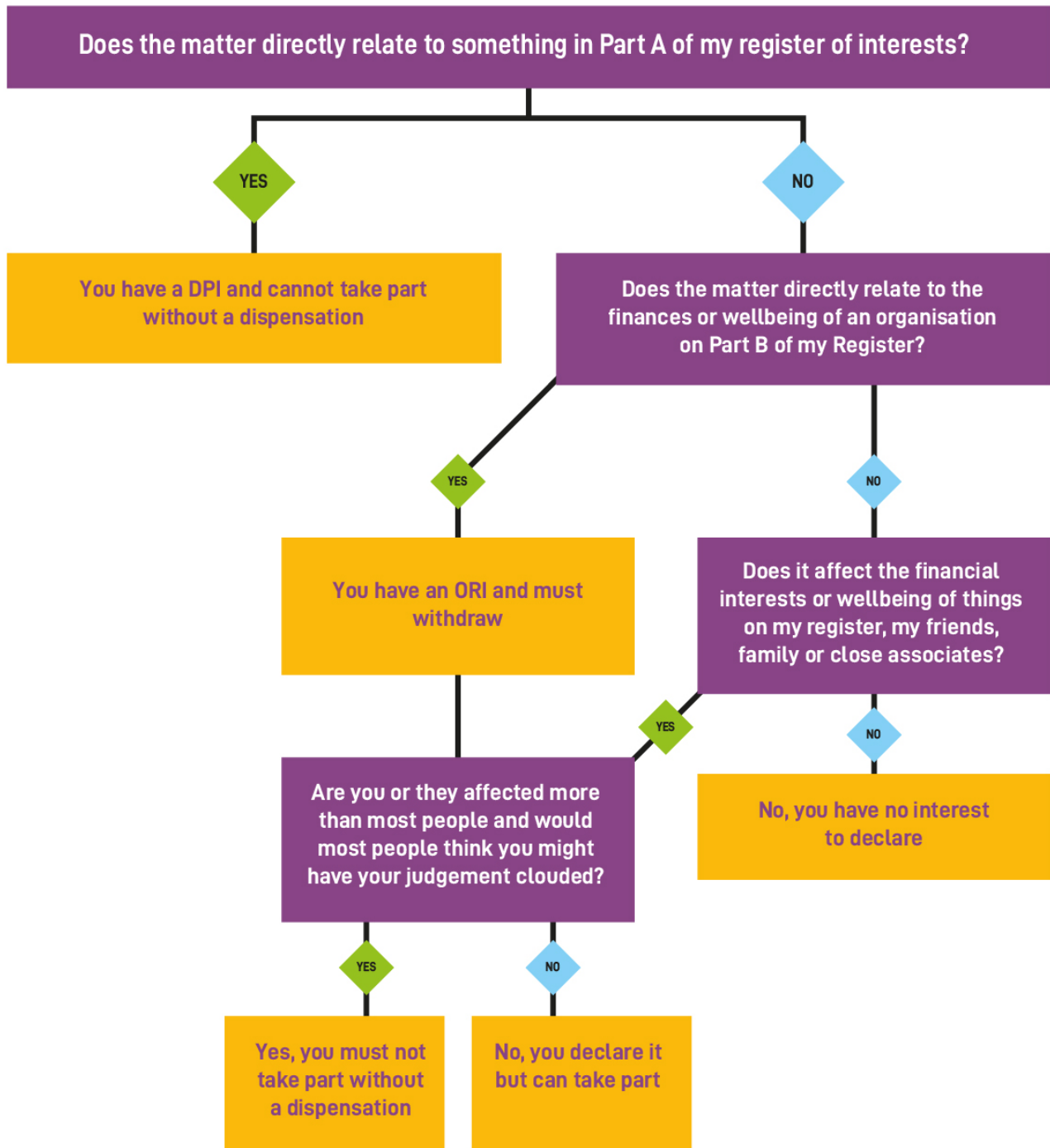
* 'director' includes a member of the committee of management of an industrial and provident society.

* '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

You have a personal interest in any business of your authority where it relates to or is likely to affect:

- 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
 - (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)



REPORT TITLE	LOCAL PLAN EXAMINATION: MAIN SOUNDNESS ISSUES & ACTION PLAN
Executive Summary	The purpose of this report is to update Members in line with the Inspector's post hearing letter and seek endorsement of the Action Plan and consultation arrangements moving forward.
Options considered.	An option exists not to accept the Action Plan in full, and to only take forward parts and/or add through additional growth options.
Consultation(s)	Earlier iterations of the local plan
Recommendations	<p>Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:</p> <ul style="list-style-type: none"> I. the draft Action Plan is endorsed and taken forward to the timelines outlined; II. the updated evidence and background papers are endorsed; III. the consultation arrangements and communication Plan are endorsed; IV. that delegated authority is given to the Acting Planning Policy Manager in consultation with the Planning Portfolio Holder to finalise the Action Plan and consultation material and continue to respond to the Inspectors questions during the Examination period and hearing(s)
Reasons for recommendations	To address the inspectors' main concerns relating to soundness
Background papers	Further supporting evidence can be found in the examination library www.north-norfolk.gov.uk/localplanexamination

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement
Contact Officer	Iain Withington, Acting Planning Policy Manager iain.withington@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	The report addresses all five themes: Our Greener Future, Developing Our Communities, Meeting Our

	Housing Need, Investing in Our Local Economy and Infrastructure and A strong, Responsible & Accountable Council.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Adopted 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	<p>None that are specific to this matter of the local plan Examination.</p> <p>Key Dates: Receipt of Inspectors Initial Letter: July 2024 Local Plan Examination Hearings: January to March 2024 Matters and Issues- November 2023 – January 2024 Delegated Authority given to PPM and PO for Planning to respond to the Inspectors questions prior to and during the Examination hearings: July 2023. Local Plan Submission: May 2023</p>

1. Purpose of the report

- 1.1 **The purpose** of this report is to seek Member endorsement on the Action Plan and available additional options and consultation arrangements in order to address the local plan Inspector's main soundness issues raised in his May 2024 letter (examination library document [EH006\(f\)](#)), which the Council received on 22 July 2024.
- 1.2 It is also the intention to seek authority to consult on the Action Plan in line within the timeline expected by the Inspector and the new "Pragmatic" approach now being adopted by the Planning Inspectorate (PINS) following the change in government as set out by Matthew Pennycook MP Minister of State for Housing, Communities and Local Government (MHCLG), in his letter to Paul Morrison, Chief Executive of PINS on 30th July 2024 and his reply on 1st August 2024 set out in appendix 1d.

2. Introduction & Background

- 2.1 The local plan hearing sessions were undertaken during January to March 2024 across three weeks of public hearings. These were informed by a series of "matters and issues" questions previously raised by the inspector, and officers' responses along with further third-party responses and debate on the

hearing day(s). These questions and responses along with further actions and information requested from the Inspector can be found in the [Examination Library](#) documents EH001 - EH017(f).

Identification of main soundness issues

- 2.2 Following the examination hearing sessions, in his initial post-hearings letter dated 24 May 2024 (delayed due to the General Election and received by the Council on 22 July 2024), the Inspector raised three main soundness issues which the Council are required to address and re-consult on:
1. **A shortfall in housing provision**
 2. The approach to **Small Growth Villages** as set out in Policy SS1 of the emerging local plan.
 3. Updating the **Gypsy and Traveller evidence base** to reflect the change in definition brought in in December 2023 and to bring forward any necessary changes to the Plan that might arise from this updated evidence.
- 2.3 The Inspector's letter is available as examination document [\[EH006 \(f\)\]](#), along with the Councils response [\[EH006 \(g\)\]](#) and the Inspector's subsequent reply [\[EH006 \(h\)\]](#) and set out in appendices 1a-c of this report.
- 2.4 In addition to this, notice is given that there are a number of other soundness issues, some of which the Council has proposed modifications to address through the matters and issues stage, and others which were agreed through the hearing sessions under delegated authority granted previously (July 2023). Such issues are considered by the Inspector to be corrected relatively simply through modifications and the intention is that these will be subject to a further letter from the Inspector and brought together once the main issues above have been addressed and the examination progresses onto the main modifications stage.

Pragmatism in assessing Local Plans: Ministerial letter to PINS

- 2.5 Following the change in government, Matthew Pennycook MP, MHCLG, wrote to PINS on 30th July setting out the new government's position on how examinations should be conducted in regard to delays and the meaning of "pragmatism". The letter updates the previous government's instructions around taking a pragmatic stance and assisting Councils to achieve a sound plan and replaces this instruction with an expectation that 'pragmatism' should be used only where it is likely that a Plan is capable of being found sound. This is to ensure that Inspectors can focus their time and resource on plans that can be adopted. Deficient plans that cannot be easily fixed at examination should be sent back to allow the local authority, in partnership with their local communities, to bring forward a new plan. The letter goes on to state that:

'Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall. Local authorities should provide regular progress updates of their work to the Planning Inspector during any agreed pause.'

The full letter and Response from the Planning Inspectorate is attached as Appendix 1d.

- 2.6 The Council can now expect a fundamental change in approach to the examination of the emerging local plan as pragmatism clearly in this context now has its limits and the expectation of the Inspector is that the issues identified need to be resolved within the six-month time frame envisaged.
- 2.7 To this aim a broad approach and six-month timescale has been agreed with the Inspector as detailed in the correspondence attached -appendix 1b &c. In his response it is confirmed that the mostly positive response by the Council to *“increase the supply and flexibility of housing delivery in the Plan by approximately 1,300 – 1,500 depending on how this is done “should be a good basis for the examination to proceed.....”* but the timeline *should not be allowed to slip significantly”*. However, he adds a note of caution and advises that progression is required to address nutrient neutrality constraints and demonstrate the larger site allocations are moving forward to the projected timelines in order to avoid any further slippage and revisions on the local plan trajectory with the inevitable consequences of further numbers being required to make up any subsequent shortfalls. He confirms that the timeline is acceptable to PINS but should not be allowed to slip in the context of pragmatism set out by the Minister.

3. Action plan to address the main soundness issues

1- Growth Options - additional site allocations and allocation extensions

- 3.1 In order to address the main soundness concerns around the shortfall in dwellings and address the concerns around ensuring there is adequate early provision in the Plan to ensure a Five-Year Housing Land Requirement, officers have reviewed the remaining site options as detailed in the site assessment booklets and further information provided during the earlier hearing sessions. The review of existing site options has categorised sites as Group A and B. Group A consists of sites capable of intensification, extension and those sites previously identified as suitable but not required to meet the housing requirement at the time. Group B consists of sites which were previously discounted but have potential subject to addressing appropriate scale and mitigation of constraints. Each site option has been informed by a further sustainability appraisal, SA and undergoing HRA screening and appropriate assessment where necessary. The sites and their full assessment will be incorporated into a further background paper and form part of the further consultation material along with detailed phasing information.
- 3.2 The details of the additional sites and extensions are contained in the Action Plan set out in Appendix 2 and Appendix 3, which show that a further 785 dwellings could be provided through proposed allocations.
- 3.3 In addition, a modification proposed by the Council [EH013k] increases windfall allowance in the Plan from 2029/30 to 180pa. This modification has been accepted by the Inspector (paragraph 47 appendix1a) and as such provides for a further 495 dwellings against the identified shortfall.
- 3.4 With the subsequent adoption of the Wells Neighbourhood Plan, the Council can also include the neighbourhood plan allocation for affordable housing at Two Furlongs Hill. This provides for a further 45 dwellings and Housing colleagues are actively seeking to work with the town council to bring this forward.

2 - Spatial Strategy - Small Growth Villages

- 3.5 In order to address the main soundness concerns around identifying more opportunities for villages to grow and thrive, as detailed in Paragraph 83 of the NPPF, (December 2023), it is proposed to consult on the following proposals:

I. Increase the number of Small Growth Villages (SGVs). The Inspector put forward an option around the potential expansion of the list of SGVs to *'include those with a key service and (say) three secondary/desirable services'* as set out in examination document [EX034(a)]. Along with the ten villages identified at this time, a broader review of the districts villages within the Distribution of Growth Background Paper 2, [C2] was undertaken and the two further villages of Erpingham and Felmingham have since been identified as meeting the revised criteria. Consequently, a total of twelve villages have been assessed, with conclusions to remove Neatishead and Swanton Abbott from this list. An addendum to the background paper detailing the full assessment and justification for selection is attached as Appendix 4. In total a further ten villages have been identified along with new settlement boundaries. The boundary review is contained in Appendix 5 and will form part of the additional consultation material.

II. Increase the percentage indicative allowance from 6% to 9% across all of the SGVs. This would result in an indicative housing allowance across all SGVs of 873 dwellings, which is a net gain of 421 into the Plan of which 277 are derived from the additional new villages.

The full list and relevant indicative housing allowance is detailed in the attached Action Plan- Appendix 2.

- 3.6 Officers originally put forward an 8% increase to the indicative housing allowance, but on further analysis it is considered 9% allowance would build in more flexibility to the Plan and achieve the Councils ambitions helping rural communities to grow and thrive, especially where this will support local services and promote opportunities for affordable housing. (NPPF paras 78-79). This percentage also ensures policy SS1 continues to remain in general conformity with paragraph 70 of the NPPF (2023) which looks for approximately 10% of the overall housing requirement to be from small to medium sized sites, where the total revised housing requirement for the entire local plan period has been calculated as being approximately 8,900 dwellings.

3 - Updated Gypsy and Traveler Evidence

- 3.7 Updated evidence to support the local plan examination was required due to the change in definition adopted by the government in December 2023. This came about following a judgment handed by the appeal courts in relation to a discrimination challenge and has resulted in the definition reverting back to defining travellers as all those of travelling background, not just those who are currently travelling as detailed below:

"persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently."

In determining whether persons are “gypsies and travellers” for the purposes of planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances*

- 3.8 The revision also provides the opportunity to update the base information by utilising the 2021 census data which was not available when the original study was undertaken.
- 3.9 The revised North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment, Sept 2024, GTANA, is attached in Appendix 6 which identifies a need for 11 pitches over the revised Plan period in total of which 7 are estimated to be required in the first 5 yrs.
- 3.10 The study conclusions continue to substantiate that the future need for permanently occupied pitches is likely to be very small and mainly arises from the few Gypsy families already resident in the district and potentially forming new households within the existing family units on existing sites. Transit pitches for seasonal visits to the district are available at Fakenham and Cromer and have proved to be sufficient to address the demand for these types of sites. The study does also recommend that the council at a corporate level set up a negotiated stopping places policy to help manage transit provision. This involves allowing households residing in caravans being able to stop at an agreed location for an agreed and limited period of time. This though is seen as being outside the local plan and it should be noted that the study demonstrates that the existing transit sites are underutilised. It should however be noted that stakeholders feedback identifies concerns about the condition of the transit sites which in itself may affect their level of use, (para 4.6, page 29).
- 3.11 As set out in the council’s response to matter 6 [EH012(a)], it is considered that the policy approach detailed in Policy HOU5 and its use of a criteria, provides the flexibility for families and remains entirely appropriate to address the identified needs in North Norfolk, is positively prepared, justified, effective and consistent with national policy and a proportionate approach to the level and type of need.
- 3.12 It is considered that, other than the incorporation of the revised ethnic need figure into the local plan through a hearing modification, no other changes are required to be put forward for consultation to address the issues contained in paragraphs 54 – 56 of the Inspector’s initial letter detailed in appendix 1a and repeated in paragraph 4 of the letter dated 30th August 2024 and set out in appendix 1c.

4. Options

- 4.1 An option exists not to accept the Action Plan in full, and to only take forward parts and/or add through additional growth options. It is considered that the Action Plan put forward provides a sound basis from which to proceed in line with the inspector’s commentary as detailed in para 2.7 of the report, but residual risks do remain that could result in the Plan being found unsound if not fully implemented.

- 4.2 Site allocations: There remain limited further options in considering the suitability and deliverability.
- I. There is the potential for a further 100 dwelling allocation in Hoveton, HV05 Land at Horning Road & South of Littlewood Lane. However, the site's suitability and deliverability and in particular, access, wider highways and landscaping issues, have not been fully established and the site could not be proposed with any certainty at this time.
 - II. Site C19/2 Land west of Roughton Rd, Cromer, a slight variation of C19, is actively being promoted. However, NCC Highways object to any allocation for estate scale development regardless of access arrangements due to the local road network being unsuitable for anything other than very small-scale development advising that the road network to the south is of insufficient width with no pedestrian provision, and so raises a safety objection. To the north there is not the standard of walking and cycling provision that would be required to meet LTP policy, and they consider that there is no meaningful way of achieving this at this time.
 - III. In Holt, one further site at Beresford Road, site reference HO4 was identified as suitable but since this site has subsequently been granted planning permission it is already included in the supply trajectory and cannot be allocated in the Plan.

4.3 Small Growth Village options:

- I. The SGV Indicative Housing Allowance could be set at a lower or higher percentage. A higher allowance of, for example 10% or more, has the significant potential of placing more growth in the SGVs than the higher order Large Growth Villages and could introduce risks around excessive reliance on unspecified sites adding to a higher degree of uncertainty. A smaller allowance reduces the flexibility in the Plan should there be further slippage in the trajectory and delivery of the allocations and consequently introduces further risk at examination.
- II. There is an option to include the village of Neatishead as a SGV. The assessment carried out in Appendix 4 discounts the settlement as a SGV because the school and church are located in two neighbouring hamlets where there is a lack of safe and sustainable access. However, Neatishead village itself provides one key service and two secondary services and an indicative housing allowance of 9% growth would provide an opportunity of potentially 21 new dwellings.
- III. The Council could go further and identify settlement boundaries and introduce a further tier within Policy SS1 Spatial Strategy, for example, to support infill development within villages that have a lower level of services and facilities but that could provide a low level of sustainability (for example, 1 key service and 2 secondary/ desirable services or no key service and 3 or more secondary/ desirable services). From reviewing the villages within the Distribution of Growth Background Paper 2, approximately 14 such villages can be identified. A number of these villages have significant environmental constraints in relation to flood risk (zones 2 and 3) and are in close proximity to sensitive landscapes and built heritage, as well as infrastructure/ accessibility constraints that would likely prevent or significantly curtail sustainable infill development.

This approach is also considered to introduce a level of dispersed growth that, as an option, was ruled out in the early stages of the Plan's development, as it does not align with the ethos and objectives of the Plan and wider carbon objectives of the Council in facilitating carbon reduction, not least to help achieve the UK's legal commitments in relation to climate change. Such an approach may contribute marginally to social sustainability but not sustainable development in its widest form given the concentration of services in higher order centres and the inevitable increased contributions to greenhouse gases and increased and arguably disproportionate costs and reliance on travel by private car. Given the dispersed nature, lack of public transport, especially when North Norfolk's greenhouse gas emissions are already dominated by CO2 emissions from the transport sector, and the pockets of rural deprivation, such an approach is considered to be at odds with the wider objectives of delivering climate resilient sustainable development and minimising the demand for resources and mitigating the impacts arising from climate change. Such an approach would also require additional time and resources. Such an approach could have a marginal affect in supporting small business and would contribute to windfall opportunities.

5. Timeline to address the main soundness issues

- 5.1 The recent correspondence from the Minister of State (MHCLG) to PINS directs that *'Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall.'* Where Plans are falling outside the scope of 'pragmatism', Inspectors are now taking strong, bold action, as [a recent example at Solihull](#) on 4th September 2024 demonstrates.
- 5.2 The Inspector helpfully concludes in his latest letter (appendix 1c [\[EH006 \(h\)\]](#)) that the Plan is capable of being found sound with limited additional work to address soundness issues, and that the timeline the Council proposes (below) for the various steps to progress the Plan are acceptable. However, he also enforces the expectation *'that additional work should be progressed at pace'* and *'should not be allowed to slip significantly'*. Regular progress updates are required.
- 5.3 Consequently, Members are advised that given the direction from Minister of State and PINS, and the time constraints, **this is the one and only opportunity to address the main soundness issues.**
- 5.4 In order to support the Council to achieve its intention of having a new local plan adopted in Spring 2025 it is advised that it remains vital that work progresses in alignment with the following timetable as endorsed by the Inspector:

Task		Date Expected
1.	Initial scoping and background work	August 2024 COMPLETE
2.	Completion of Background Papers and detailed assessments	September 2024 IN PROGRESS
3.	Member endorsement (Planning Policy & Built Heritage Working Party)	October 2024 IN PROGRESS

4.	Member endorsement (Cabinet)	4 th November 2024
5.	Further Regulation 19 Public Consultation (Main Soundness Issues)	6 th November to 18 th December 2024 (TBC)
6.	Further Public Hearing(s)	February 2025 (TBC)
7.	Public Consultation on Proposed Main Modifications Finalisation of proposed main modifications, consolidation of supporting documentation, and undertaking of required consultation.	TBC
8.	Receipt of Inspector's Report and adoption	TBC

6. Further Regulation 19 Public Consultation (Main Soundness Issues)

- 6.1 The main soundness issues identified by the Inspector, and the proposed solutions to address them as outlined in the Action Plan, must be subject to public consultation ahead of further examination hearing sessions which are anticipated early in the New Year.
- 6.2 The timeline above identifies a six-week public consultation commencing Wednesday 6th November 2024 and closing Wednesday 18th December 2024. The team appreciates the seasonal nature of this period, however, there is no suitable alternative available and it is considered that a six-week consultation period provides sufficient opportunity for responses on the limited range of issues which is the subject of this consultation period.
- 6.3 Members are requested to note and endorse the Consultation Arrangements & Communications Plan for this consultation, included as **Appendix 7**.

7. Corporate Priorities

- 7.1 Delivering the local plan remains a key commitment and component part of the Corporate Plan covering all five themes: Our Greener Future, Developing Our Communities, Meeting Our Housing Need, Investing in Our Local Economy and Infrastructure and A strong, Responsible & Accountable Council.

8. Financial and Resource Implications

- 8.1 As a result of the required work there are additional inspector / Pins and consultation costs. No additional staff resource is anticipated to be required at this time to deliver the Action Plan as proposed. The policy teams focus, and priority remains the local plan delivery.

9 Legal Implications

- 9.1 The Council must produce a local plan which complies with various regulatory and legal requirements and in determining its policy approaches 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.

- 9.2 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
- 9.3 The Inspector has confirmed in his post hearing letter – Appendix 1a, that he is satisfied the council has met the duty to co-operate and other legal requirements relating to Plan preparation to date, Due process, however, must still be followed.
- 9.4 There remains a residual risk of challenge as allowed by the statutory legislation.

10 Risks

- 10.1 Significant soundness risks exist if the issues presented in the Inspectors post hearing letter cannot be addressed in full and within the time constraints set out.
- 10.2 The 1,000 additional dwellings required to address the shortfall is considered by the Inspector as the minimum. There remains residual risk of sites being delayed due to nutrient neutrality and challenge through consultation and further hearing(s) around the Action Plan. This could have a bearing on the number of additional dwellings needed to ensure an adequate housing land supply going forward. The Action Plan therefore needs to build in flexibility and be able to withstand further changes to the Plans trajectory.
- 10.3 A failure to allocate additional sites could result in excessive reliance on unspecified windfall sites and add uncertainty to the Plan. Not allocating sufficient sites to improve delivery in first five years will result in the Plan not being able to provide the required 5-year housing land supply.
- 10.4 There remains a residual risk that the Action Plan will not be sufficient to address the shortfall and soundness issues following consultation and further expected Hearing(s). It should be noted that in the new era of pragmatism it is considered there will not be another opportunity for readdress.
- 10.5 As detailed above, any pauses to undertake additional work should usually take no more than six months overall. Where Plans are falling outside the scope of 'pragmatism', Inspectors are now taking strong, bold action. Failure to undertake the work in the allotted time could result in the Plan being found unsound and the Council required to start again. In such circumstances the Council would be left with significant costs, dated planning policies and the continuation of a limited land supply for a significant period of time, along with reputational damage and a lost opportunity to influence the district in line with its climate change ambitions. Any new local plan would need to conform to the latest version of the NPPF and an expected higher housing requirement.
- 10.6 There remains the risk of slippage in consultation dates due to third party work not being completed to the tight deadlines and ahead of consultation and consultation material not being finalised due to high demands being placed on staff to contribute to other works streams in a timely manner.
- 107 Further staff sickness or loss of resources will affect the ability of the team to deliver.

11 Net Zero Target

- 11.1 No assessment has been made against the council's [Net Zero 2030 Strategy & Climate Action Plan](#). The local plan does not accord with the considerations which are designed for internal projects. The local plan sets a Planning Framework which seeks development to be delivered with the highest regard to sustainable development and climate change principles and promotes a proactive and comprehensive approach to mitigate and adapt to climate change through moving towards a low carbon future.

12 Equality, Diversity & Inclusion

- 12.1 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.

- 12.2 There are no direct implications on equality within this report. The local plan has been subject to an equalities Impact Assessment and tested at the independent amination.

13 Community Safety issues

N/A

14 Conclusion and Recommendations

Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:

- I. the draft Action Plan is endorsed and taken forward to the timelines outlined;**
- II. the updated evidence and background papers are endorsed;**
- III. the consultation arrangements and communication Plan are endorsed;**
- IV. that delegated authority is given to the Acting Planning Policy Manager in consultation with the Planning Portfolio Holder to finalise the Action Plan and consultation material and continue to respond to the Inspectors questions during the Examination period and hearing(s)**

Appendices

Appendix 1a - Inspector's Post-Examination Hearings Letter received, 22.7.24

Appendix 1b - Council's response to Inspector's Post-Examination Hearings Letter 16.8.24

Appendix 1c - Inspector's response, 30.8.24

Appendix 1d- Correspondence between Minister of State and PINS, July/ August 2024

Appendix 2 - Draft Action Plan

Appendix 3 - Draft Additional site mapping

Appendix 4 – Draft SGV Addendum
Appendix 5 – Draft settlement boundary review
Appendix 6 – Draft GTANA Sept 2024
Appendix 7 – Consultation Arrangements

End

North Norfolk Local Plan Examination

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

24 May 2024¹

Dear Mr Williams

NORTH NORFOLK LOCAL PLAN EXAMINATION

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

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

Duty to Co-operate and Legal Requirements

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

Plan Period

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

Local Housing Need

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

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

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

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

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

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

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

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

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

Housing Requirement

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

Five Year Housing Land Requirement

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

Spatial Strategy and Site Selection

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

⁵ The figure is uncapped as it is below 560 dpa

⁶ NPPF Paragraph 74

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

Overall Housing Provision in the Plan

17. During the plan period, housing would be provided in the following ways which are discussed in turn:
 - (i) allocations being made in the plan
 - (ii) the small growth village policy
 - (iii) large and small sites with planning permission as at April 2023
 - (iv) windfall sites that arise during the plan period

(i) Allocations being made in the plan

18. The plan proposes a series of allocations which were selected using the process described above. With the exceptions set out below, the allocations are justified by the evidence and suitable for inclusion in the plan. In relation to the timing of development on these sites, the Council's latest trajectory (EH013(I)) acknowledges slippage in some cases from that expected in the submission plan. However, the trajectory still appears unduly optimistic in the case of the two large allocations at North Walsham and Fakenham and this has significant implications for housing delivery in the plan period. My conclusions in this respect are also explained below.

North Walsham

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

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

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

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

Fakenham

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

⁸ 560 dwellings and elderly accommodation totalling 67 dwelling equivalents.

Cromer

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

Wells

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

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

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

Sheringham

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

Hoveton

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

Ludham

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

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

(ii) The Small Growth Villages Policy

39. The strategy in Policy SS1 and set out in Appendix 4 relating to Small Growth Villages is not justified or effective as submitted. Whilst it is potentially a sound approach to specify an acceptable percentage growth figure for such settlements rather than to allocate sites in the plan, the approach is inherently uncertain and brings significant disadvantages both for the communities concerned and other interested parties. However, there are precedents for such an approach (eg Breckland Local Plan Policy HOU04) and should the Council wish to pursue it, some modifications would be required.
40. In particular, these are:
- the stipulation that no further permissions will be granted after the village 'allowance' is reached is arbitrary and not justified. The policy should be reworded to allow 'not significantly more than' a 6% increase in dwellings.
 - there is no justification for an arbitrary quantitative limit on new dwelling provision within the defined settlement boundaries at any time.
 - criterion (e) should be deleted as there is no justification for small sites to incorporate substantial community benefits. Any requirements to make the development acceptable can be secured under Policy HC4.
 - criterion (f) is not justified as currently worded and would render the policy ineffective by causing uncertainty and acting to deter schemes coming forward¹⁰. The criterion could however be reworded to state that suitable schemes proposed in partnership with a registered social landlord that would deliver affordable housing in excess of the normal Policy HOU2 requirement will receive particularly favourable consideration.
 - Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance (31 in the revised list in document A5.11) set at 0 as there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future. This is due to unstable ground conditions and a permanently high water table leading to groundwater infiltration of the sewerage network for which no solutions have yet been identified.
41. The total provision from this source over the plan period should therefore be reduced from 453 to 422 dwellings starting in 2027/28 as the policy only commences on adoption of the plan. However, there is considerable scope for widening the policy as explained in paragraph 48 below.

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

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

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

(iv) Windfall sites that arise during the plan period

43. The submitted plan was based on April 2021 monitoring data and assumed that previously unidentified windfall sites would start to contribute housing completions just one year later, in 2022/23. However, the latest trajectory, with planning permissions recorded as at April 2023, assumes a two-year gap with windfall sites making a contribution from 2025/26. This is a reasonable assumption. The likely contribution from this source can only ever be an estimate, with the submitted plan assuming 135 dpa, a cautious figure well below the historic average of 295 dpa which came forward from windfall sites during the period 2016-23. It should be noted that under Policy SS1 windfall sites in 22 small growth villages will now count towards a separate total.
44. In the letter dated 25 March 2024 (EH013(k)) the Council propose that the windfall allowance for the period 2029/30 to 2039/40 should be increased to 180 dpa, an additional contribution of 495 dwellings over the plan period. This is considered in paragraph 47 below.

Overall Housing Provision in relation to the Requirement

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

Housing Provision – Way Forward

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

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

Employment Land

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

Gypsy, traveller and travelling showpeople's accommodation

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

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

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

¹³ December 2023 version

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

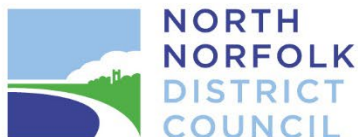
56. In order to ensure the plan is sound, the Council should therefore commission an updated study to assess need in accordance with latest best practice and then to consider what steps might need to be taken to address its findings in the plan, including if necessary proposing allocations or amending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

Conclusion

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

David Reed

INSPECTOR



16 August 2024

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

Dear Mr Reed,

NORTH NORFOLK LOCAL PLAN EXAMINATION

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

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

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

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

Plan Period

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

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

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

Local Housing Need

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

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

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

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

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

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

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

Five Year Housing Land Supply

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

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

Allocations being made in the Plan

CROMER

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

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

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

Land at Clifton Park (C10/1)

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

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

FAKENHAM

Land North of Rudham Stile Lane (F01/B)

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

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

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

NORTH WALSHAM

Land West of North Walsham (NW62/A)

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

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

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

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

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

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

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

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

Land East of Bradfield Road (NW52)

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

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

WELLS-NEXT-THE-SEA

Land Adjacent Holkham Road

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

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

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

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

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

SHERINGHAM

Former Allotments, Weybourne Road, Adjacent The Reef

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

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

HOVETON

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

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

LUDHAM

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

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

The Small Growth Villages Policy

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

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

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

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

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

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

2. 'adjacent developable land' relates to land all in the same ownership.

3. 'local Registered Providers' that are active in the area.

4. 'agreed terms' relates to the terms agreed with the Local Authority.

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

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

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

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

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

Windfall sites that arise during the plan period

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

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

Housing Provision - Way Forward

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

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

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

Employment Land

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

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

Gypsy, traveller and travelling showpeople's accommodation

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

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

Action Plan

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

1. Gypsy, traveller and travelling showpeople's accommodation

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

2. The Small Growth Villages Policy

Pending officer review and member endorsement:

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

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

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

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

Timeline

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

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

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

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

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

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

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

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

Yours sincerely

Iain Withington

Acting Planning Policy Manager

01263 516034 | planningpolicy@north-norfolk.gov.uk

North Norfolk Local Plan Examination

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

30 August 2024

Dear Mr Williams

NORTH NORFOLK LOCAL PLAN EXAMINATION

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

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

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

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

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

David Reed

INSPECTOR



Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP

Minister of State
2 Marsham Street
London
SW1P 4DF

Paul Morrison
Chief Executive
The Planning Inspectorate

30 July 2024

By email

Dear Paul

The Government knows how essential it is that local authorities have an up-to-date local plan in place as a basis for making sustainable decisions about the future of our cities, towns and countryside. We are committed to the plan making system; it is the right way to plan for the growth and environmental enhancement our country needs – by bringing local authorities and their communities together to agree the future of their areas.

I fully recognise the crucial role that the Planning Inspectorate plays in this, through the examination of plans impartially and publicly to ensure that they are legally compliant and sound. The work that the Inspectors do through Advisory Visits also helps to ensure those plans that are submitted have the best chance of being found sound.

However, we cannot ignore the fact that the length of examinations has been increasing, from 65 weeks on average in 2016 to 134 weeks in 2022.

In 2015, the Government set out an expectation that Inspectors should operate "pragmatically" during local plan examinations to allow deficient plans to be 'fixed' at examination. This has gone too far and has perversely led to years of delays to local plan examinations without a guarantee that the plans will ever be found sound, or that the local authorities will take the decisions necessary to get them over the line. This has to end.

Section 20 of the Planning and Compulsory Purchase Act 2004 provides that a local planning authority must not submit a local plan unless they have complied with relevant legislative requirements, and they think the plan is ready for independent examination by a Planning Inspector. Accordingly, an authority should not be submitting for examination a deficient plan believing the Inspector will use significant time and resource during the examination to 'fix' it.

Noting this concern, there is a role for Inspectors in ensuring plans that are submitted are capable of being found sound, which is why I would strongly encourage the Planning Inspectorate to continue supporting local authorities through Advisory Visits to ensure effective preparation for the examination process.

I also want to empower Inspectors to be able to take the tough decisions they need to at examination, to ensure they can focus their time on those plans that are capable of being found

sound and to realise this Government's aim of universal plan coverage. For this reason, I am writing formally to set out the Government's expectations on how examinations should be conducted in this respect.

Pragmatism should be used only where it is likely a plan is capable of being found sound with limited additional work to address soundness issues. Any pauses to undertake additional work should usually take no more than six months overall. Pragmatism should not be used to address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall. Local authorities should provide regular progress updates of their work to the Planning Inspector during any agreed pause.

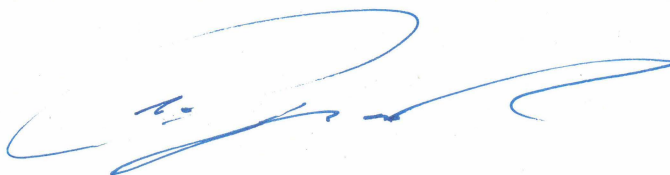
Any extensions to the six-month pause should only be allowed at Inspectors' discretion to deliver adopted local plans under the current system. In agreeing extensions, the Inspector should be confident that the local authority can complete any outstanding work in the agreed timeframe.

This new approach will apply to all plans with immediate effect. Existing pauses already agreed by an Inspector should remain in place unless the Inspector considers there is insufficient progress being made.

This will enable Inspectors to focus their valuable time and resources on those plans that are capable of being found sound and can be adopted quickly to provide certainty to local communities. Where a plan is unable to be found sound, the local authority will need to work in partnership with their local community to bring forward a new plan.

I would be grateful if you could ensure that Inspectors are aware of these changes and that you update your procedural guidance and support to Inspectors accordingly, as they continue their critical role in examining plans to support our ambition of universal coverage of local plans.

Yours sincerely,



MATTHEW PENNYCOOK MP
Minister of State



3rd Floor
Temple Quay House
2 The Square
Bristol, BS1 6PN

Direct Line: 0303 444 5443

Email: Paul.Morrison@planninginspectorate.gov.uk

Matthew Pennycook MP, Minister of State
2 Marsham Street,
London,
SW1P 4DF

Date: 1 August 2024

Sent by email to:
PSMatthewPennycook@communities.gov.uk

Dear Matthew,

Thank you for your letter of 30 July 2024.

You are right to note that implementing pragmatism in the way expected by the Government since 2015 has led to delays in local plan examinations. In many cases, the extent of delay has been significant, running into years, and in some exceptional cases examinations have consequently taken five or six years to complete. Notwithstanding the intention of pragmatism, its operation has not infrequently led local communities to be poorly served by the system. This has been a source of frustration for me and my Inspectors. I therefore welcome the new expectations that your letter sets out. I am making all examining Inspectors aware of this change. They will be briefed, and our procedure guide and other relevant material will be updated accordingly.

It is inescapable that this fresh approach will lead to an increase in local plans being recommended for withdrawal from examination or being found unsound. But that should not be seen as any sort of failure of pragmatism or of the system more generally. On the contrary, withdrawing from examination opens up the space for local authorities to genuinely work with their local communities, local businesses and others to rectify problems with their local plan in an open-minded way that is almost impossible in the context of an ongoing examination. Moreover, it can be quicker to local authorities to resolve soundness problems outside the formalities of the examination process. To that end, we will continue to support those authorities that wish us to undertake an Advisory Visit, whether they are preparing a wholly new plan or re-visiting a plan that has failed to progress through the examination to adoption.

Yours sincerely,

Paul Morrison CBE
Chief Executive

This page is intentionally left blank

ACTION PLAN: DRAFT PPBHP Oct 2024

1. Additional Modifications

Windfall allowance	Action: Include in the trajectory the additional windfall allowance - additional contribution 495, examination modification.
Wells NP allocation	Action: include the now made neighbourhood plan allocation in the Local Plan supply - additional 45 dwellings, examination modification.

Modifications: Total dwellings 540

Gypsy & and Travelers approach policy HOU5	Action: - Publish updated accommodation needs assessment Amend and consult policy HOU5 to incorporate the updated “ethnic” need figure and reference the new study, (11).
--	--

2. Small Growth Villages

Spatial strategy Policy SS1	Action: In relation to Small Growth Villages consult on amended criteria 1 and the identification of additional Small Growth Villages and associated settlement boundaries and increased indicative housing allowances	
	Existing	Updated Allowance 9%
	Aldborough	22
	Badersfield	35 *
	Bacton	45
	Binham	11
	Catfield	39
	Corpusty and Saxthorpe	29
	East Runton**	64
	Happisburgh	36
	High Kelling	20
	<i>Horning</i>	<i>Examination Modification – constrained -0</i>
	Little Snoring	24
	Little Walsingham (Walsingham)	31
	Overstrand	38
	Potter Heigham	No change - constrained - 0
	Roughton	37
	Sculthorpe	28
	Sea Palling	No change - constrained - 0
	Southrepps	34
	Sutton	46
	Trunch	37
	Walcott	No change - constrained - 0
	Weybourne	20
	Additional	

	Beeston Regis	43
	Erpingham	29
	Felmingham	23
	Itteringham	5
	Langham	15
	Northrepps	43
	Ryburgh	26
	Stibbard	13
	Tunstead	42
	Worstead	38

* Badersfied indicative housing allowance of 4.5% ** East and West Runton are combined- housing allowance is broadly distributed evenly between the two settlements.

SGV Total 873, additional net gain 421 from the submitted Plan

3. Additional; and or extended allocations

Town	Type	Ref/ location	Number dwellings (approx.)	Commentary
Large Growth Towns				
Cromer	Additional allocation	C10 /1 Land at Runton Road/Clifton Park, Cromer	70	Site was previously identified as suitable and actively promoted throughout EiP.
	Extension to existing allocation C22	C22/4	100	Part of site is already allocated in the Local Plan.
North Walsham	Additional allocation	NW16	330	Site was previously identified as suitable and actively promoted throughout EiP.
Small Growth Towns				
Hoveton	Extension to existing allocation HOV01/B	HOV01/C	30* (0)	Site extension and increase in numbers was previously put forward as a modification at Matters and Issue stage following pre application advice (site dwelling total 150+ care home. Increase in numbers form part of the amended trajectory submitted during the hearing sessions [EH013k].
	New	HOV06/A	50	Site adjacent to existing allocationHOV01/B. Part of the previous site was identified as suitable

				(HOV06). Considered allocation will assist in local infrastructure improvements.
Stalham	Extension to existing allocation ST19/A	ST19/B	80	Site is adjacent to the previous and existing allocation. The enlarged site was previously considered suitable.
	NEW	ST04/A	45	Site forms a smaller part of a larger site previously put forward (ST04) adjacent to the settlement boundary. The site was discounted from further consideration due to their being more preferable sites to meet the housing requirements. The smaller site is proposed in order to reduce the potential for edge of settlement landscape impacts.
Large Growth Villages				
Blakeney	Additional Allocation	BLA01/B	30	Site was previously identified as suitable and a potential allocation.
Briston	Extension to existing allocation BRI02	BRI02/B	25	Site extension allows for more comprehensive development and highway mitigation across the two smaller allocations.
Ludham	Extension to existing allocation LUD01/A	LUD01/C	40	Site forms a smaller part of larger site previously considered (LUD01/B) and actively promoted throughout EiP and through development management process as one that overcomes the constraints previously identified in relation to the larger site.
Mundesley	Extension of existing allocation MUN03/B	MUN03/A	15	Site reverts back to the larger allocation which along with the smaller allocation MUN03/B was previously identified as suitable.

*No net gain- additional numbers already included in revised trajectory [EH013k].

4- Additional supply to address shortfall

- Additional site allocation total:785

- Additional sites Neighbourhood Plans: 45
- Windfall: 495
- SGV: 421 (net gain)

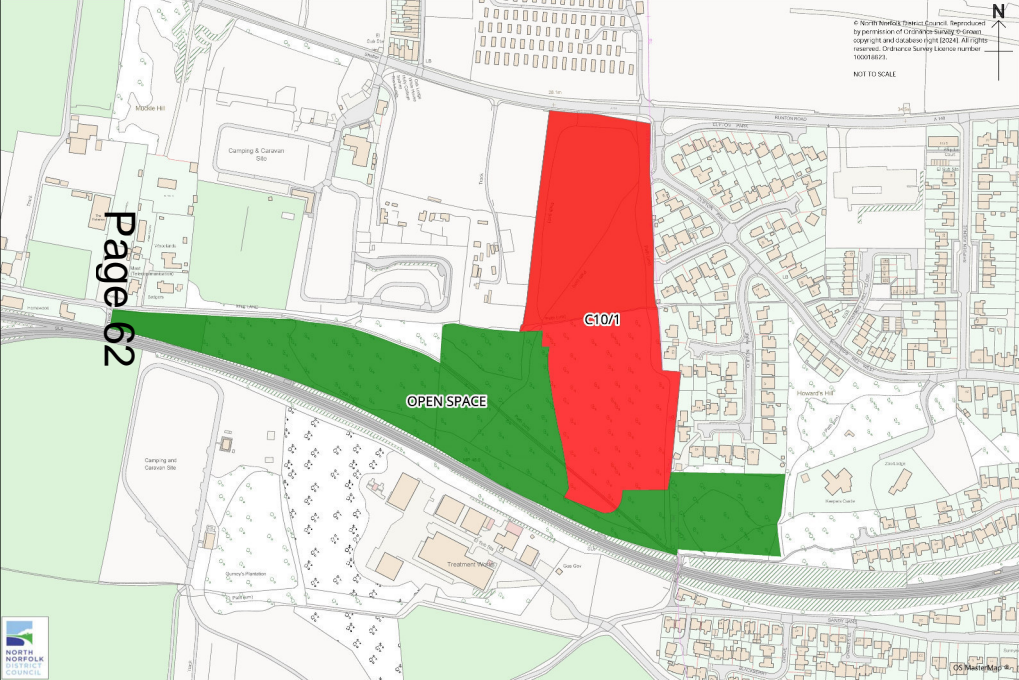
Total proposed additional supply: 1746

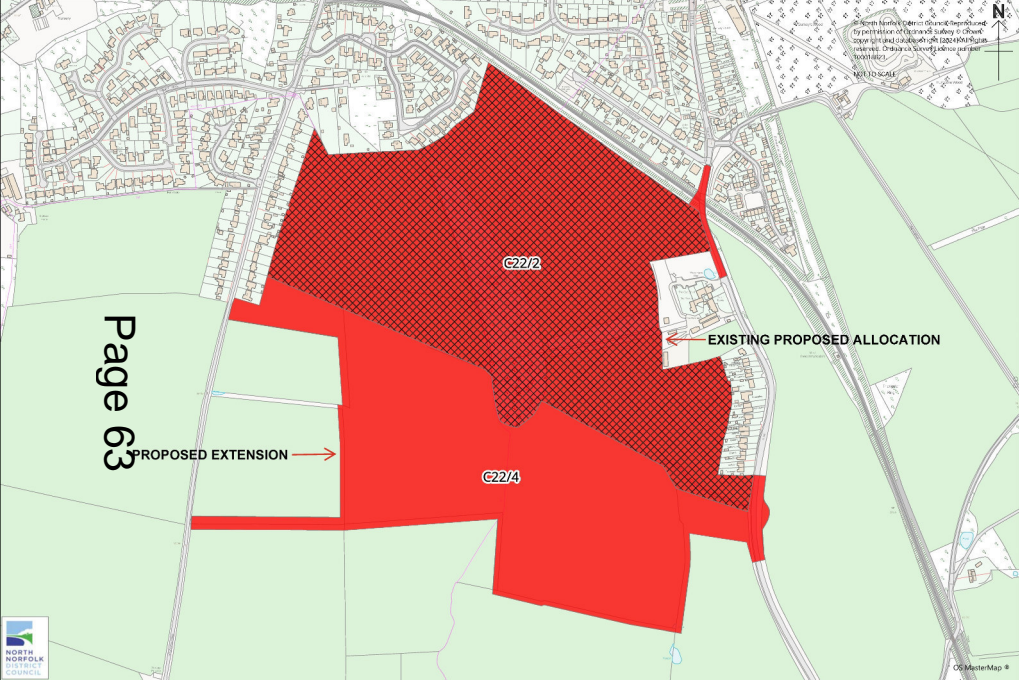
End

Appendix 3 Draft Additional Site Mapping



Page 62





Page 63

PROPOSED EXTENSION →

EXISTING PROPOSED ALLOCATION



NW16



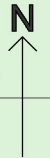
PROPOSED EXTENSION

EXISTING PROPOSED ALLOCATION

HV01/C

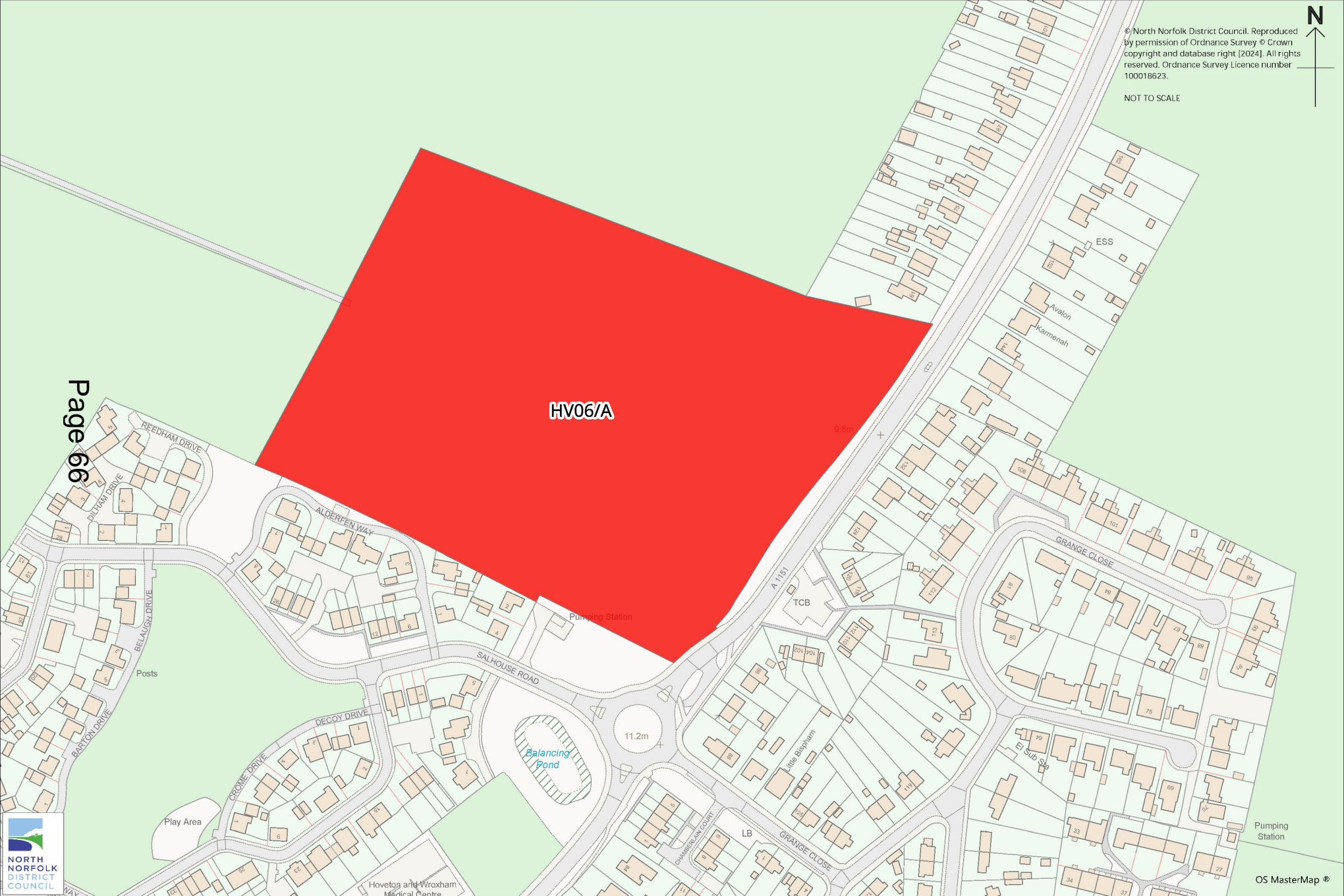
HV01/B

Page 65



HV06/A

Page 66





Page 67

ST19/B

ST19/A

PROPOSED EXTENSION

EXISTING PROPOSED ALLOCATION

BLA01/B

Page 69





NOT TO SCALE

EXISTING PROPOSED ALLOCATION →

LUD01/A

PROPOSED EXTENSION →

OPEN SPACE

LUD01/C

Page 71

Ludham

CS MasterMap®

MUN03/B

OPEN SPACE

PROPOSED EXTENSION

MUN03/A

Mundesl

Draft Addendum to the Distribution of Growth Background Paper 2: Small Growth Villages

1. Introduction

1.1 This Paper has been produced in response to the Inspector's Post Examination Hearings letter¹ received in July 2024, and in particular, to the Inspectors conclusion that the Local Plan needs greater certainty in bringing forward more housing. This Paper provides evidence in relation to one of the Inspectors directions with regards to the Small Growth Village tier of the settlement hierarchy in order to achieve the required housing growth. The Inspectors letter at paragraph 48, refers to:

(iii) Expansion of the list of Small Growth Villages to include those with a single key service and (say) three secondary/ desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not included.

1.2 At paragraph 49 of the letter, the Inspector confirms the national planning policy support for seeking such amendments to the Small Growth Village through paragraph 79 of the NPPF, 2021 (paragraph 83 of the NPPF 2023), which states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

1.3 The Inspector concluded in paragraph 49 that, as 'submitted the plan's policies for smaller villages, even some with key services, are unusually restrictive.' Consequently, the objective of this Paper is to assess and identify further villages that can be considered for small scale growth, in response to the Inspector's soundness concerns.

1.4 During the Local Plan Hearing Sessions document EX034(a)² was provided, at the Inspectors request, which included a list of villages that fell immediately below being identified as Small Growth Villages, having one key service and three secondary or desirable services. Ten villages were identified from the Regulation 18 stage assessment within the Distribution of Growth Background Paper 2³ as having one key service and three secondary or desirable services. These settlements are the core group that have been

¹ Examination Library Reference EH006(f) [eh006-f-inspectors-post-examination-hearings-letter.pdf \(north-norfolk.gov.uk\)](#)

² Examination Library Reference EX034(a): [ex034-a-response-to-inspectors-information-request-to-the-council-small-growth-villages.pdf \(north-norfolk.gov.uk\)](#)

³ Examination Library Reference C2: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

assessed using the same methodology as for the existing identified Small Growth Villages, apart from the reduction of the required number of secondary or desirable services being present from four to three, as proposed by the Inspector.

- 1.5 In addition, a broader review of the villages within Background Paper 2 that did not meet the Small Growth Village criteria has been carried out. This has identified the villages of Erpingham and Felmingham as meeting the revised services and facilities criteria.
- 1.6 For clarity, the same general data and documents, as cited in Background Paper 2, have been used as the evidence base to support the additional village assessments. The local housing need information has been updated to provide a more current snapshot of the Council's Housing Waiting List.

2. Summary of Methodology

- 2.1 All of the stages of the methodology are set out in detail in the Distribution of Growth Background Paper 2. The stages and their conclusions have been summarised below for reference:

- Stage 1 – Defining Important Services

This stage sets out the twelve core facilities and services that are regarded as being the most important to the sustainability of settlements and where the availability of some services is considered to be more critical than others in relation to the smaller settlements. Consequently, for villages, the services are separated into three categories of 'Key Services', 'Secondary Services' and 'Desirable Services.'

- Stage 2 – Initial Sift, identifying settlements which had a school and/or a shop

The presence of a school and/or a convenience shop are considered to be essential core services and as such, the Background Paper sifted all settlements to ensure one of these key services was identified in the settlements. This initial sift identified a total of 60 settlements (all 7 towns and 53 villages). The settlements that did not have either a school or a convenience shop were excluded from further assessment (para. 4.5 of Background Paper 2) at this stage.

- Stage 3 – Second Sift, identifying settlements with at least 1 key service and 4 secondary or desirable services

The second sift identified those remaining settlements with all identified services together with those which have a shop or school and at least four of the other identified services. Appendix 1 of the Background Paper provides a summary list of the facilities and services within each village (this table was duplicated in the requested Hearings document, reference EX034(a)). The initial list of 53 villages reduced to 28.

- Stage 4 – Constraints (Environmental and Infrastructure), having regard to historic environment, flood risk, coastal erosion, environmental designations, and landscape character.

A detailed environmental assessment of identified settlements is carried out. This considers the degree to which growth in each of the remaining settlements may be constrained having regard to historic environment, flood risk, coastal erosion, environmental designations and landscape character.

Table 3 of Background Paper 2 details the three environmental constraint classifications which are concluded as being either Highly Constrained, Moderately Constrained or Limited Constraints. At this stage, consideration is also given to infrastructure constraints, reflecting the Council's Infrastructure Position Statement and any known infrastructure considerations regarding each settlement.

- Stage 5 – Housing Need and potential availability of sites (need and capacity).

This stage of the methodology considers the number of people on the Council's Housing Waiting List, concluding as either Higher, Moderate or Lower Demand. The amount of available land as published in the Council's Housing & Economic Land Availability (HELAA) is also assessed and concludes as being Higher, Moderate or Lower Land Availability.

Following the approach of the methodology, an overall conclusion is reached taking account of access to services, facilities and infrastructure, the possible environmental impacts of development, the identified need for development and the opportunities (capacity) to address these needs.

- 2.2 For the purposes of this Paper, Stage 3 of the methodology has been amended in order to assess the suitability of the villages that had been identified as having one key service and three secondary or desirable services.

3. Assessment of additional villages

- 3.1 The Local Plan Hearing document EX034(a) identified the ten villages of, Beeston Regis, Itteringham, Langham, Neatishead, Northrepps, Ryburgh, Stibbard, Swanton Abbott, Tunstead and Worstead as having one key service and three secondary or desirable services. The opportunity has also arisen to take a wider review of the other villages within the Distribution of Growth Background Paper 2, which has identified the villages of Erpingham and Felmingham as having the requisite level of services and facilities. Overall, twelve villages have been assessed within this Paper.
- 3.2 A detailed assessment has been carried out for each of the villages through the application of Stage 2 through to Stage 5 of the methodology summarised in Section 2 above and where an amended qualifying benchmark of one key service and three secondary or desirable services at Stage 3 is applied. An overall conclusion regarding the suitability of the

settlement being identified as a Small Growth Village is reached at the end of each assessment.

Beeston Regis

3.3 Beeston Regis was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 1,097 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
Key Services	Primary School	N	
	Convenience Shopping	N*	*Cromer Road Stores and Sheringham Tesco’s in adjacent settlement.
	GP surgery	N*	*Sheringham Medical Practice in adjacent settlement.
Secondary Services	Main Road	Y	A149 (bus route) Sheringham Train Station in adjacent settlement.
	Post Office	N	
	Other Shopping	N	
	Public House	N*	*Fishmongers Tavern in adjacent settlement.
	Meeting Place (e.g. Village Hall)	N	
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	Y	Regent Garage
	Place of Worship	Y	All Saint’s Church
	Employment Land	N*	*no specific designation but many commercial/ retail employment opportunities in Sheringham.

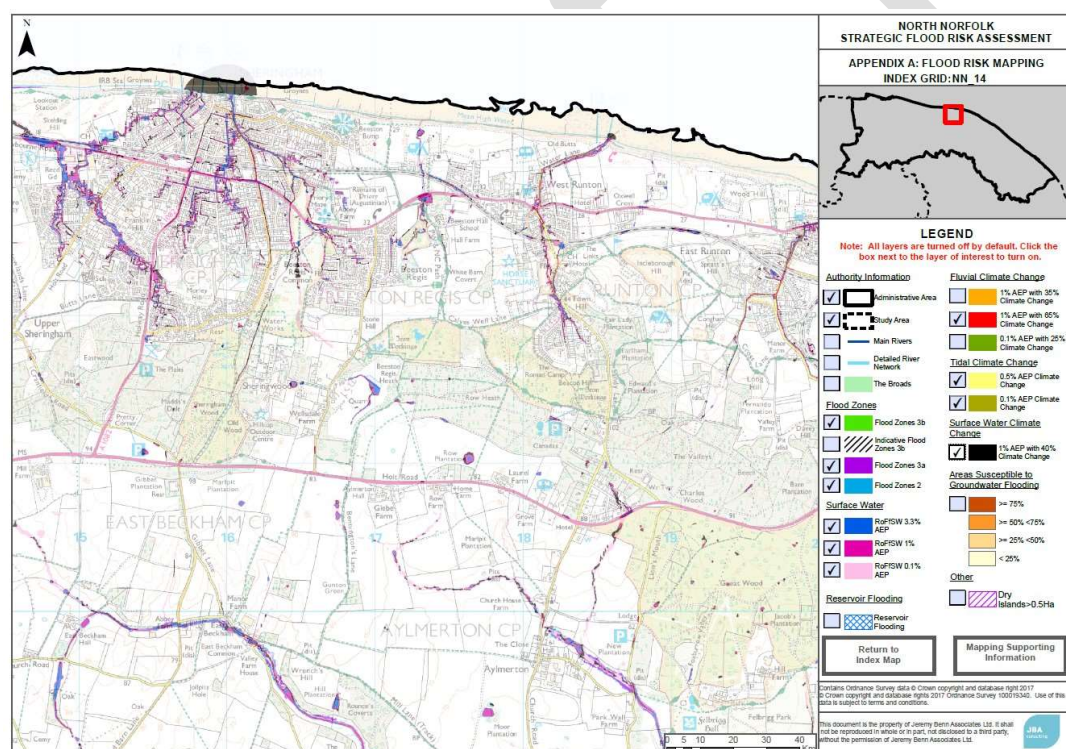
Built Environment

- Beeston Regis Conservation Area centres around Beeston Regis Priory, a Scheduled Ancient Monument and the associated land on the north side of the main road (A149) and bounded by Nelson Road to the east and the railway line to the north.
- Grade I listed building – Remains of St Mary's Priory and All Saints Church.
- Grade II listed building – Abbey Farmhouse.

Natural Environment

Flood risk

The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The settlement is located within Flood Zone 1 and where the built form of the village is subject to pockets of surface water flooding, predominantly along roads.



Coastal erosion

The settlement of Beeston Regis is not within the Coastal Erosion Constraints Area/ Coastal Change Management Area.

The area east of Beeston Bump along the immediate coastal frontage is within the Coastal Erosion Constraints Area/ Coastal Change Management Area, the closest point of which is located approximately 500m from the village of Beeston Regis.

Environmental designations

- The built form on the east side of Briton's Lane up to the main road (A149) is within the National Landscape designation. Most of the built form of the village (on the west side of Briton's Lane) is outside but adjacent to the Norfolk Coast National Landscape designation.
- Beeston Regis (and Sheringham) Common SAC and SSSI immediately to the west.
- Briton's Lane Gravel Pit SSSI, Candidate County Geodiversity Site approximately 350m to the south
- Roman Camp and Beeston Regis Heath CWS approximately 350m to the south.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Coastal Shelf landscape type and Wooded Glacial Ridge to the south.

The Coastal Shelf landscape type is categorised by the cliffs stretching along the coastline, where the presence of the sea defines views throughout this landscape area. The settlements within the area are seen as having a distinctive character and historical value providing a sense of place. The character of the skyline is also of high importance within the Coastal Shelf landscape character area, particularly the views from the Cromer Ridge to the coast and vice-versa.

The LCA vision for this landscape character area is a richly diverse coastal landscape of biodiverse and productive farmland and resilient semi-natural habitats which provide the distinctive and scenic setting for well-maintained and cohesive historic settlements, creating a strong focus for sustainably managed tourism and recreation. Settlements will be clearly separated by a network of seminatural habitats and farmland, with connectivity between these areas wherever possible. New development will be well integrated into the landscape and local vernacular, with a sensitive approach to lighting to maintain dark skies, and opportunities will be sought to better integrate existing coastal development. Restoration and enhancement of valued landscape features will occur alongside the managed and/or natural change of the coastline in response to climate change and erosion.

To the south of the village the landscape is categorised by the Wooded Glacial Ridge landscape type. This area is defined by the distinctive and prominent landform and land cover. The extensive and diverse woodland areas, including large areas of ancient woodland provide strong habitat connectivity for a range of woodland species. As a result of this the area is defined by a strong sense of remoteness, tranquillity and dark skies.

The LCA vision for this landscape character area is of an area dominated by wooded high ground which forms a distinct setting to settlements and which effectively contains and isolates any development but nonetheless provides a strong network of recreational and leisure opportunities. Wooded areas and other important semi-natural habitats, in particular areas of heathland, form a strong, well connected biodiversity network. Any new residential development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular, and the landscape retains, in

many locations, a strong sense of tranquillity and remoteness. The special qualities of natural beauty of the Norfolk Coast National Landscape, which encompasses most of the area, are preserved.

Infrastructure Constraints

No known infrastructure constraints.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Beeston Regis is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Beeston Regis.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 877 people on the housing waiting list expressed a preference to live in Beeston Regis.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 3 potentially suitable sites totalling 308 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It

also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Beeston Regis itself has no key services and three secondary or desirable services. However, the settlement is situated in very close proximity to the higher order settlement of Sheringham, which is identified as a Small Growth Town, where there are many services and facilities that are highly accessible to residents of Beeston Regis being well connected by footpaths and the road network.
- There are limited environmental constraints and no known infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement is identified as a '**Small Growth Village**', given its very close proximity to Sheringham, a Small Growth Town, where a wide range of facilities and services are highly accessible to the residents of Beeston Regis. In addition, there are limited environmental and infrastructure constraints associated with the settlement and moderate housing need.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Beeston Regis it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

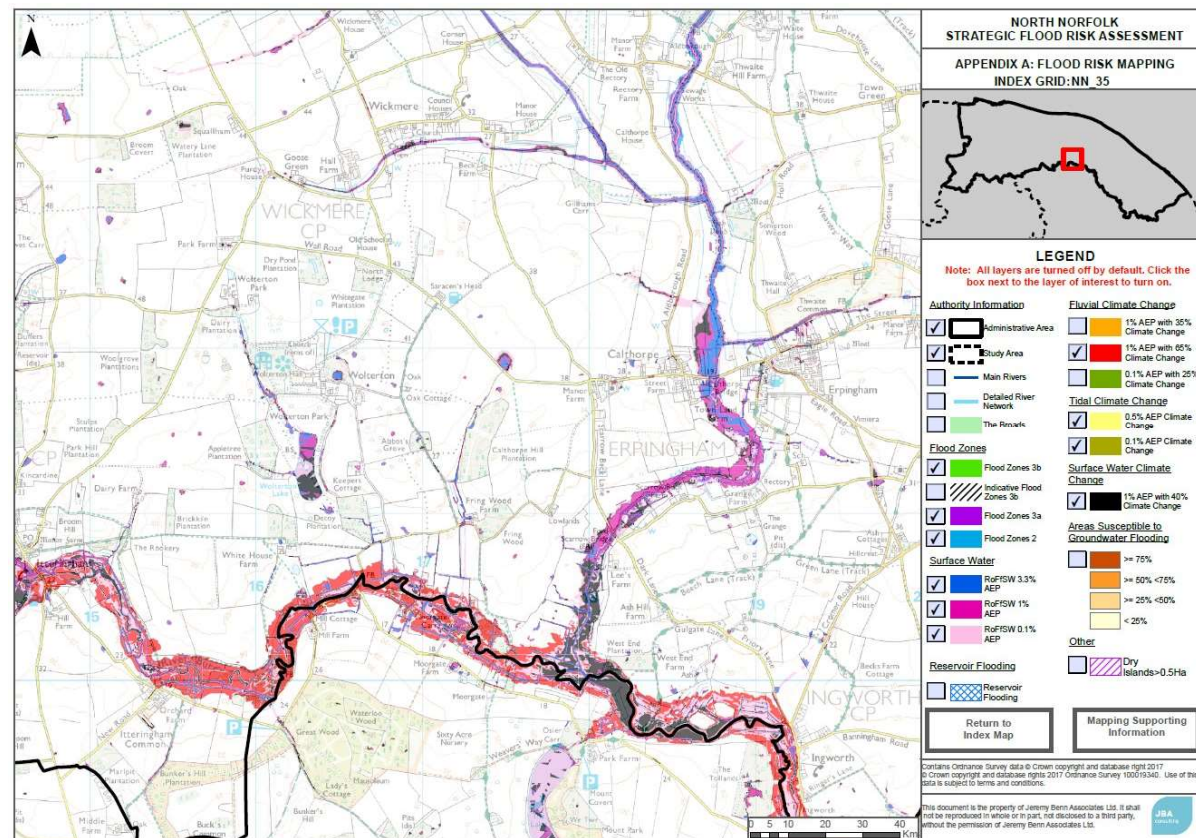
Erpingham

- 3.4 Erpingham was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 736 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and

land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y*	Erpingham Primary School *outside settlement boundary.
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	Y	The Spread Eagle
	Meeting Place (e.g. Village Hall)	Y	Erpingham with Calthorpe Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y*	St. Mary's Church *outside settlement boundary.
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> Mannington and Woolterton Conservation Area bounds the north of the village and includes the southern part of the parish including the primary school and the eastern part of the village adjacent to the village hall. Grade I listed building – St. Mary's Church Grade II listed buildings – including Erpingham House, The Thatched Barn at Lime Tree Farm, Homestead Farm Cottages. 			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. A</p>			

significant area of Flood zones 2 and 3a run north to south further to the west of the village and these zones follow the south side of Thwaite Common. The majority of the village is within Flood zone 1, where there is small pockets of surface water flooding along a section of The Street.



Coastal erosion

N/A

Environmental designations

- Thwaite Common CWS – located to the north of the village.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys (River Bure and tributaries) landscape type and is partially within and surrounded by Tributary Farmland landscape type.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level

of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.
- Nutrient Neutrality Foul Water Drainage Catchment – River Bure.
- Nutrient Neutrality Surface Water Catchment – River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Erpingham is identified within Affordable Housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Erpingham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 23rd September 2024, 660 people on the housing waiting list expressed a preference to live in Erpingham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is potentially one large site identified totalling 79 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Erpingham has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria for a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Erpingham it is considered that the

constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

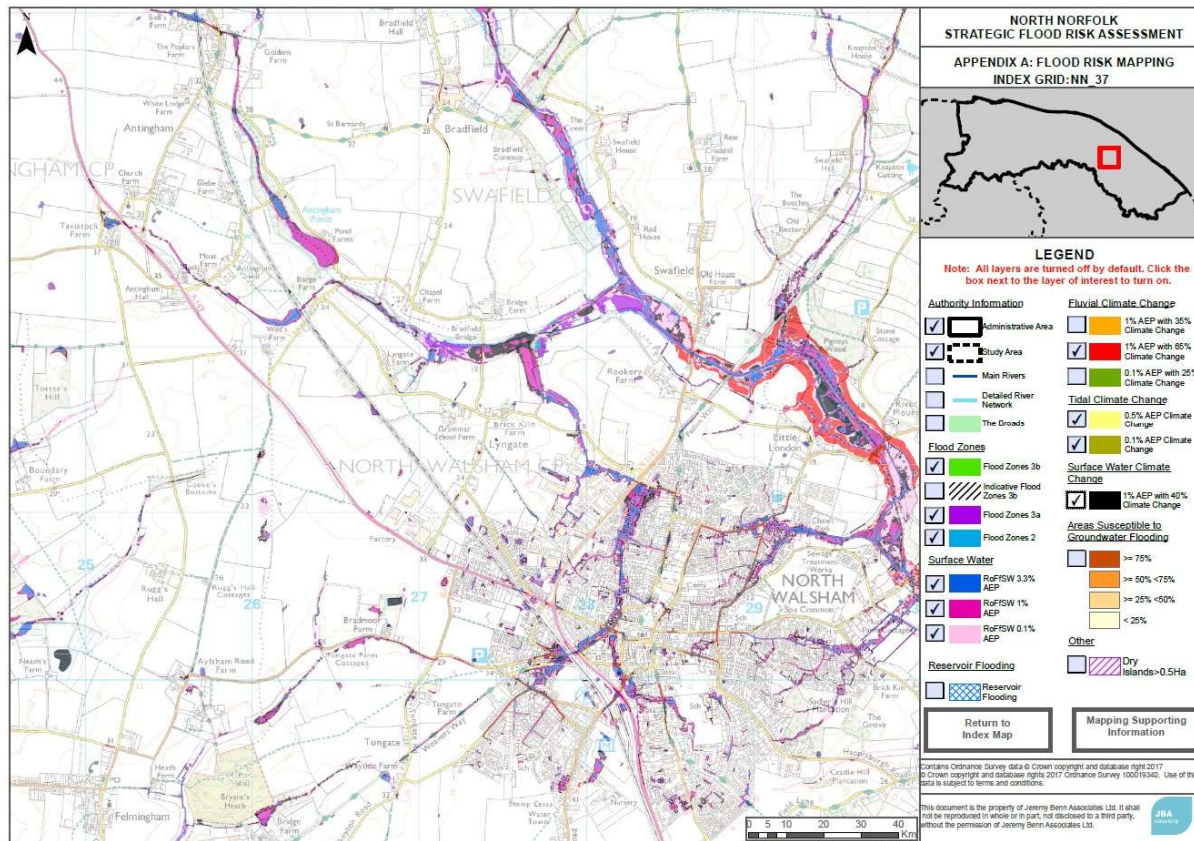
Felmingham

- 3.5 Felmingham was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 591 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
Key Services	Primary School	N	
	Convenience Shopping	Y	Felmingham Stores
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	Y	Post Office within Felmingham Stores
	Other Shopping	N	
	Public House	N	
	Meeting Place (e.g. Village Hall)	Y	Felmingham Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	St.Andrew’s Church
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> Grade II* listed building – St. Andrew’s Church 			
Natural Environment			

Flood risk

The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is located within Flood Zone 1.



Coastal erosion

N/A

Environmental designations

- Bryant's Heath SSSI approx. 500m to the east of the village.
- Weavers Way CWS approx. 450m to the south of the village.
- Felmingham Cutting LNR approx. 450m to the south of the village.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

Infrastructure Constraints

- Nutrient Neutrality Foul Water Drainage Catchment to area on north/northwest side of B1145 road.
- Nutrient Neutrality Surface Water Catchment – River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Felmingham is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Felmingham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 23rd September 2024, 725 people on the housing waiting list expressed a preference to live in Felmingham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is one potentially large suitable site totalling 51 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Felmingham has one key service and three secondary or desirable services.
- There are limited environmental and infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria to be identified as a **'Small Growth Village'**, based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Felmingham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

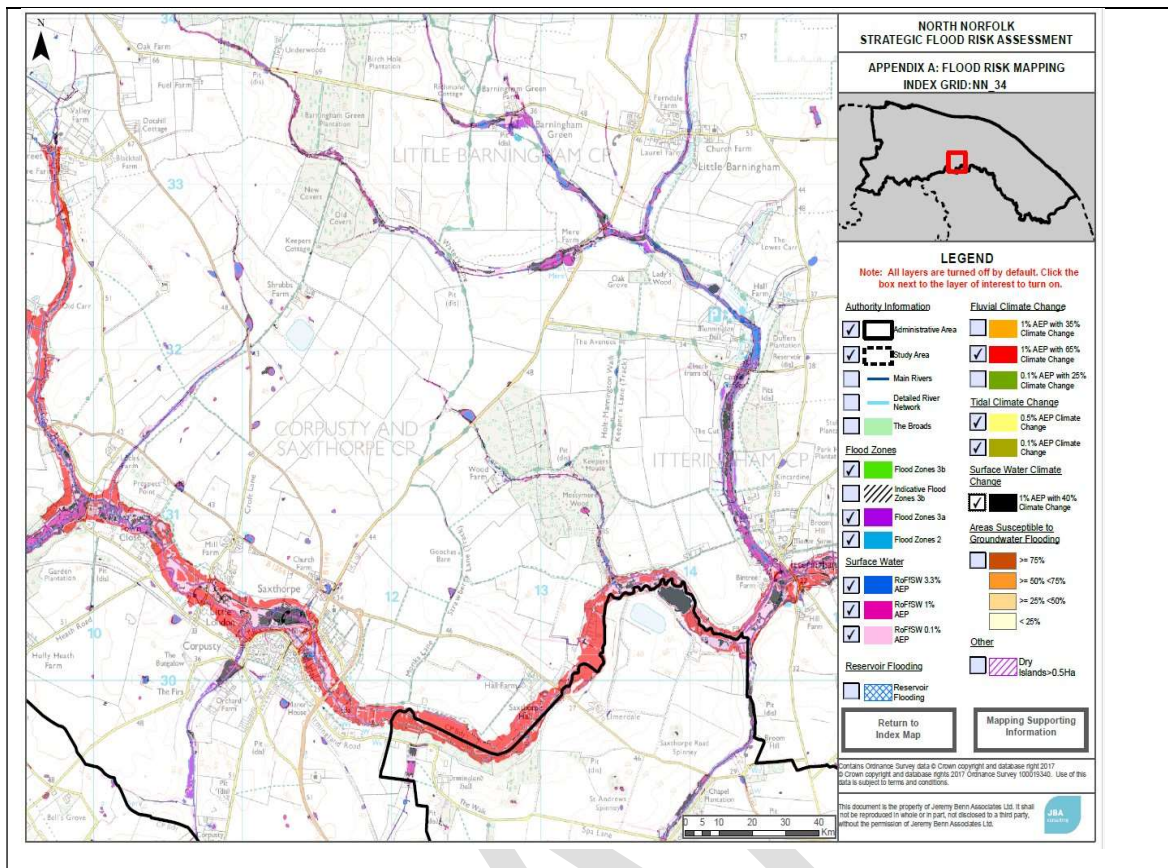
Itteringham

3.6 Itteringham was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 135 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities

Key Services	Primary School	N	
--------------	----------------	---	--

	Convenience Shopping	Y	Itteringham Village Shop,
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N*	*Within village shop, open two mornings a week.
	Other Shopping	N*	*Itteringham Village Shop incorporates café/ gallery and deli.
	Public House	Y	The Walpole Arms
	Meeting Place (e.g. Village Hall)	Y	Bure Valley Community Centre (Itteringham Village Hall)
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	St. Mary's Church
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> • Itteringham Conservation Area. • Grade II listed buildings – including the Old Rectory, Village Shop, Hill Farm • Grade II* listed buildings - St. Mary's Church, Manor House 			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the south and west by areas of flood zones 2 and 3a, where there is also surface water flooding, associated with the River Bure. The majority of the village is within flood zone 1.</p>			



Coastal erosion

N/A

Environmental designations

- Land adjacent to New Cut CWS approximately 180m to the west.
- Itteringham Gravel Pit Candidate County Geodiversity Site approximately 700m to the southwest.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys landscape type with the Tributary Farmland landscape type to the northeast and northwest.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into

its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

Infrastructure Constraints

- Accessibility - C roads/ unclassified roads.
- Nutrient Neutrality Surface Water Catchment -River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Itteringham is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Itteringham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 606 people on the housing waiting list expressed a preference to live in Itteringham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is 1 potentially suitable site totalling 10 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Itteringham has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Itteringham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

Langham

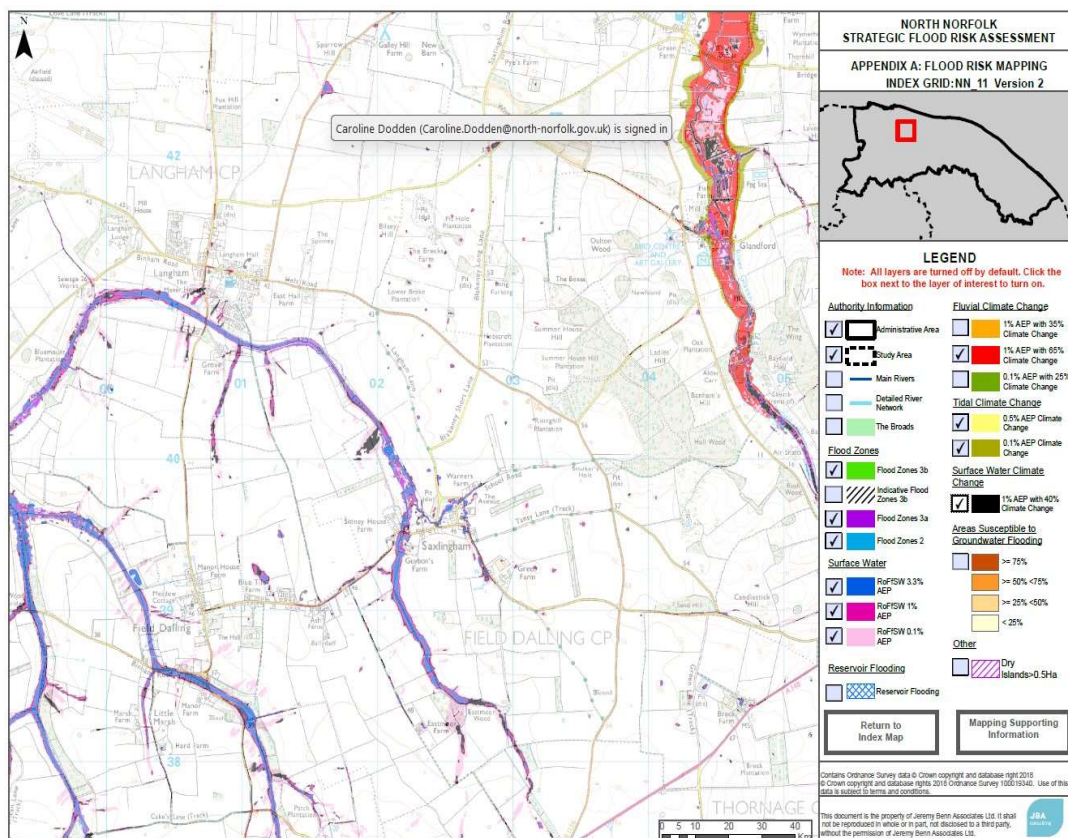
3.7 Langham was identified as ‘Countryside’ in the Core Strategy (2008). The settlement was identified as a Small Growth Village at the Regulation 18 stage of the emerging Local Plan but was removed from this tier of the settlement hierarchy at Regulation 19 stage, based on the public consultation and a subsequent review of all of the identified Small Growth Villages, which revealed that the village had one key service and three secondary or desirable services.

3.8 The settlement had an estimated population of 387 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y	Langham Village School
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	Y	The Langham Blue Bell
	Meeting Place (e.g. Village Hall)	Y	Langham Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	St. Andrew’s & St. Mary’s Church
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> Langham Conservation Area is located around the historic core of the village, with St. Andrew’s & St. Mary’s Church at its centre. Grade II listed buildings – including The Old House, Brambling Barn, Rowan Cottage, The Blubell, Langham House, The Rectory, Old Manor Farmhouse, Orchard House, Grove Farmhouse, Manor Cottage. Grade I listed building – St. Andrew’s & St. Mary’s Church 			
Natural Environment			

Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the south by the River Stiffkey. There are further pockets of surface water flooding within the village itself, predominantly in the south west of the built environment. The majority of the settlement is situated within Flood Zone 1.



Coastal erosion

N/A

Environmental designations

- The northern part of the village (north side of the Holt Road) is within the Norfolk Coast National Landscape and the southern part is outside, but adjacent to the designation.
- Langham Lane Meadow CWS approximately 850m to the southeast.
- Bilsey Hill SSSI / Little Bilsey Plantation Candidate County Geodiversity Site approximately 1.1km to the east.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys landscape type in the southern part of the village and Tributary Farmland landscape type in the northern part.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valley (Stiffkey and tributaries) landscape type is characterised by steep sided and canalised lower reaches, with a scenic coastal character. The natural beauty of the river valley landscape downstream of Wighton is recognised by its inclusion within the Norfolk Coast National Landscape, and, where the river meets the coastal marshes, the North Norfolk Heritage Coast.

The LCA vision for this landscape type is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- No known infrastructure constraints.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Langham is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Langham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 690 people on the housing waiting list expressed a preference to live in Langham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 2 potentially suitable sites totalling 430 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Langham has one key service and three secondary/ desirable services.
- There are moderate Environmental constraints and no known Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Langham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

Neatishead

- 3.9 Neatishead was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 541 people in 2016. Neatishead village straddles the boundaries of North Norfolk and the Broads Authority to the east. Some of the services and facilities are located in neighbouring hamlets. In particular, Neatishead Primary School is situated approximately 800 metres to the south within the settlement of Butcher’s Common and the parish church of St. Peter’s is located approximately 1.5km to the southeast in the settlement of Threehammer Common.
- 3.10 The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y*	Neatishead Primary School *located outside settlement boundary - within neighbouring hamlet of Butcher’s Common.
	Convenience Shopping	Y	White House Stores
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	Y	White Horse Inn
	Meeting Place (e.g. Village Hall)	Y	New Victory Hall
Desirable Services	Petrol Filling Station	N	

	Vehicle Repair Shop	N	
	Place of Worship	Y*	St. Peter's Church *located outside settlement boundary within neighbouring hamlet of Threehammer Common.
	Employment Land	N	

Built Environment

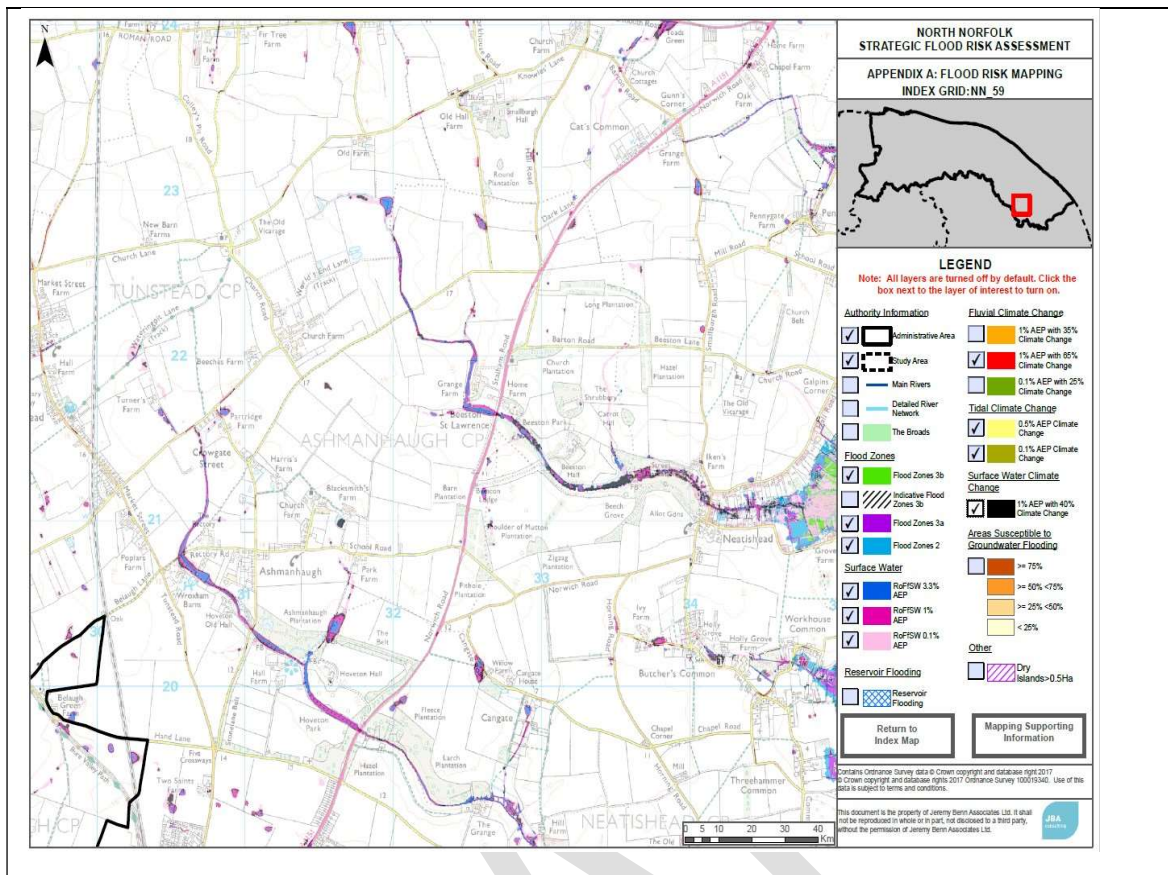
- Neatishead Conservation Area covers the majority of the buildings within the village surrounding Limekiln Dyke extending out to Iken's farm to the north and the properties on the south side of The Street.
- The Conservation Area Appraisal (adopted May 2011)- Broads Authority.
Extract from Para. 11: *The North Norfolk section of the conservation area adjoins to the south west, to include the remainder of the village; the boundary runs from Irstead Road behind the built up area to the south to join Street Hill, then down Street Hill and turns to the west to include the old Victory Hall and the buildings adjacent, along the edge of Street Plantation, then running roughly parallel to Smallburgh Road to include Iken's Farm and arable land to the north west and back down the Smallburgh Road to join the Broads Authority section of the conservation area at the junction with Hall Road.*
Appendix 4 of the Conservation Area Appraisal lists 18 buildings that make a positive contribution to the character of the conservation area.
- Grade II listed buildings including - Wherry Arch, Grove House, Barn at Grove House, The Old Laundry, March House, Ikens Farmhouse and Barn at Ikens Farm.

Natural Environment

Flood risk

The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The area of Neatishead village within North Norfolk district is within flood zone 1.

The area within the Broads Authority particularly associated with Limekiln Dyke falls within flood zones 2, 3a and 3b. There are small pockets of surface water flooding and more substantial areas that follows the line of the watercourse through Neatishead that feeds into Limekiln Dyke.



Coastal erosion

N/A

Environmental designations

- Barton Broad SSSI, SAC, SPA and Ramsar 11- wetland to the east.
- Ant Broads and Marshes National Nature Reserve to the east.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland and River Valleys landscape types.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

The River Valleys (River Ant and Tributaries) character area provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Nutrient Neutrality Foul Water Drainage Catchment -River Bure.
- Nutrient Neutrality Surface Water Catchment – River Bure (Ant Broads).

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Neatishead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Neatishead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 673 people on the housing waiting list expressed a preference to live in Neatishead.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include

provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) did not identify any sites at Neatishead.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

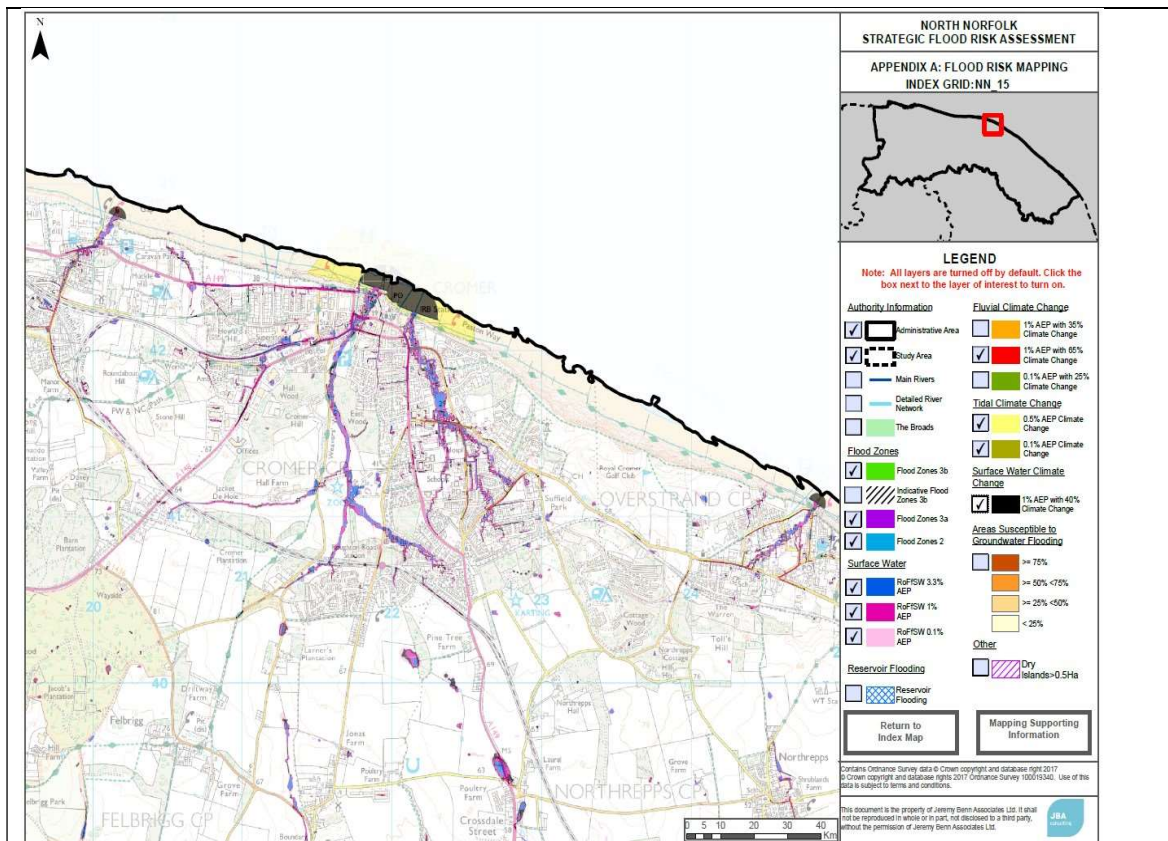
- Neatishead Village itself has 1 key service and 2 secondary/ desirable services. Neatishead Primary School is located within the neighbouring hamlet of Butchers Common to the south and St. Peters Church is located in the hamlet of Threehammer Common further to the southeast.
- There is a lack of safe and sustainable access to the school and church from Neatishead Village (no footpath and rural single lane roads).
- There are moderate Environmental constraints and limited Infrastructure constraints.
- There is moderate housing need demand and no known land availability.

The village of Neatishead would only meet the criteria for a Small Growth Village when considered in combination with two outlying hamlets. Given the dispersed nature of the facilities and services across three settlements and the lack of safe and sustainable access between them. As such, the village of Neatishead is identified as being in the '**Countryside**' for the purposes of Policy SS1.

Northrepps

- 3.11 Northrepps was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 1,102 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y	Northrepps Primary School (and Preschool)
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	Y	The Foundry Arms
	Meeting Place (e.g. Village Hall)	Y	Northrepps Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	St. Mary The Virgin Church
	Employment Land	N	
Built Environment			
<p>Northrepps Conservation Area is centred around the historic core of Church Street, extending to the southwest to include St.Mary the Virgin Church.</p> <ul style="list-style-type: none"> • Grade I listed building – St.Mary’s Church • Grade II listed buildings including – Northrepps War memorial, Church Farmhouse, Church Grange, Old Manor House 			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is in flood zone 1, where there is some surface water flooding close to Shrublands Farm and along two roads.</p>			



Coastal erosion

N/A

Environmental designations

- Within the Norfolk Coast National Landscape designation.
- Overstrand Disused railway CWS approximately 700m to the northeast.
- Templewood Estate CWS approximately 600m to the southeast.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is largely situated within the Tributary Farmland with a southern area within the River Valleys landscape type.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing

settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valleys (Mundesley Beck) character area is defined by the Mundesley Beck. This is the shortest of North Norfolk's river valleys, running parallel to the coast a little over 1km inland for most of its 7km length. This small river draws its waters from a superficial aquifer comprised predominantly of sands and gravels, and has largely been canalised with no sections of naturally meandering river channel. With the exception of the area around Mundesley, the valley is almost wholly within the Norfolk Coast National Landscape.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Northrepps is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Northrepps.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 893 people on the housing waiting list expressed a preference to live in Northrepps.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 5 potentially suitable sites totalling 150 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Northrepps has one key service and three secondary/ desirable services.
- There are moderate Environmental constraints and limited Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Northrepps it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

Ryburgh

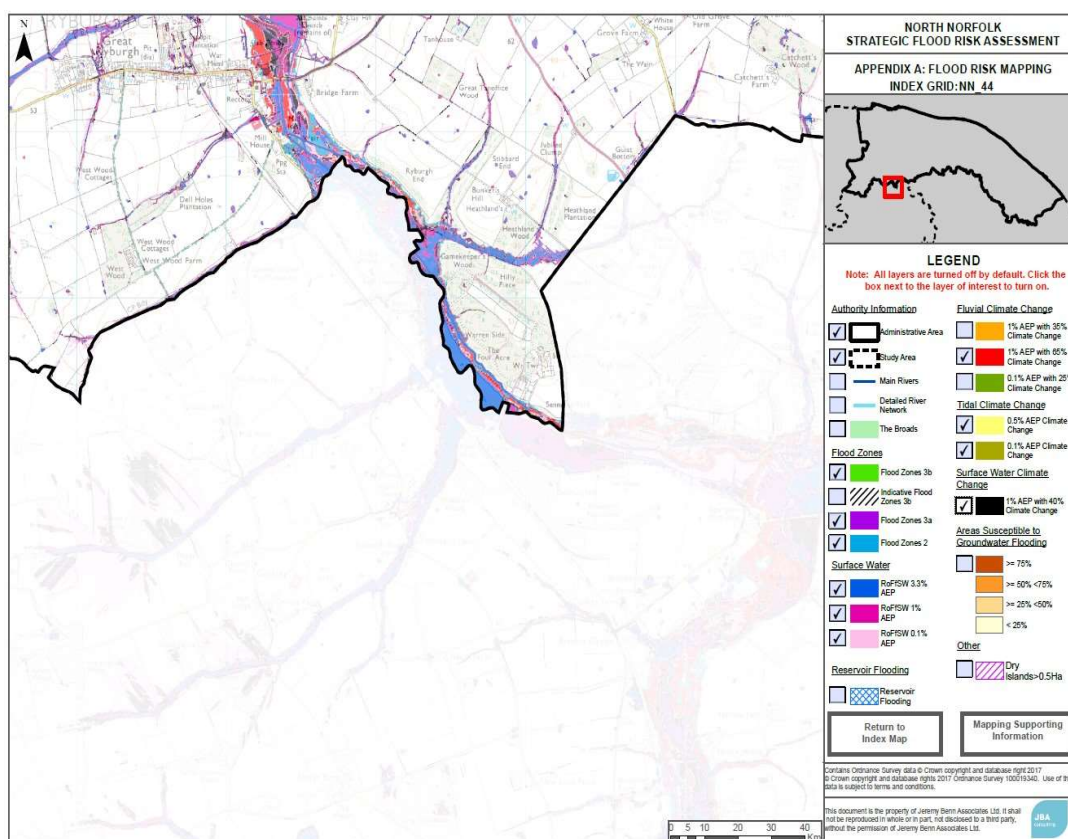
- 3.12 Ryburgh was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 662 people in 2016. The Great Ryburgh Neighbourhood Plan (2019-36) was adopted in June 2021. Policy 3: Infill Housing in Great Ryburgh, supports the small scale infill development of new dwellings within the defined settlement boundary.

The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
Key Services	Primary School	N	
	Convenience Shopping	Y	Ryburgh Village Shop
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	Y	Within Ryburgh Village Shop
	Other Shopping	N	
	Public House	N	
	Meeting Place (e.g. Village Hall)	N	
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	St. Andrew's Church
	Employment Land	Y	Crisp Malt, brewing malt suppliers
Built Environment			
<ul style="list-style-type: none"> Great Ryburgh Conservation Area covers the south and east of the village from the (former) railway line in the west and the river Wensum to the north and east. Grade II* listed building - St Andrews Church Grade II listed buildings – Boar Inn, Melody House, Three Penny Cottage, Great Ryburgh War Memorial, 21 Fakenham Road Archaeological – mid Anglo-Saxon burial site adjacent to River Wensum (source: Great Ryburgh NP) 			
Natural Environment			

Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the east by areas in flood zones 2, 3a and 3b. There are pockets of surface water beyond the built environment to the south and north and along some of the local roads. The majority of the village falls within flood zone 1.



Coastal erosion

N/A

Environmental designations

- West Wood CWS approximately 900m to the south.
- River Wensum SAC and SSSI at the closest, approximately 150m to the east (subject to nutrient neutrality strategy) and which extends north of the village.

Landscape character

North Norfolk Landscape Character Assessment (LCA, 2021)

This identifies that the village is largely situated within the River Valleys landscape type with the Tributary Farmland landscape type predominantly to the south and west.

The River Valleys (Wensum and Tributaries) landscape type provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement

pattern, with significant local variations in land cover and, consequently, in views. The Wensum is the largest river in the District, with a typical wide valley floor and low, often indistinct, valley sides. The town of Fakenham and the extended village of Hempton effectively meet at the valley floor and there is a complex interplay of settlement, riverine, industrial and surprisingly high quality ecological land types within a very small and discrete area.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

The Tributary Farmland landscape character type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggest, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape character area is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

Policy 4: Landscape Character, Ryburgh Neighbourhood Plan (NP) – development proposals must demonstrate how they are informed by, and sympathetic to, the key characteristics and landscape guidelines of the Landscape Character Areas as defined in the Ryburgh Landscape Character Assessment (C.J Yardley Landscape, 2019).

Landscape Character Areas have been defined, where the main built form of the village is immediately surrounded by the following landscape character areas: Little Ryburgh Area, Northern Enclosed Wensum Valley Floor, South of Great Ryburgh small valley, South of Great Ryburgh small Field Landscape and Western Tributary Farmland.

See Ryburgh LCA document on NP webpage for full descriptions (Examination documents (June 2020) Evidence Pack) [Home | Ryburgh Neighbourhood Plan \(north-norfolk.gov.uk\)](https://www.norfolk.gov.uk/ryburgh-neighbourhood-plan).

Infrastructure Constraints

- Catchment school is Stibbard All Saints CE VA Primary School – potential future need for additional provision, monitored through Local Plan.
- Accessibility – C roads/ unclassified roads.

- Nutrient Neutrality Foul Water Drainage – River Wensum.
- Nutrient Neutrality Surface Water Catchment – River Wensum.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Great Ryburgh is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Great Ryburgh.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 666 people on the housing waiting list expressed a preference to live in Great Ryburgh.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 5 potentially suitable sites totalling 466 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative

constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Great Ryburgh has one key service and three secondary/ desirable services.
- There are limited Environmental constraints and moderate Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a **‘Small Growth Village’**, based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as ‘Small Growth Villages’ have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council’s Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into account the policies of the Ryburgh Neighbourhood Plan (2019-36) and the environmental constraints, including the historic built environment and known infrastructure constraints. However, for Great Ryburgh it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

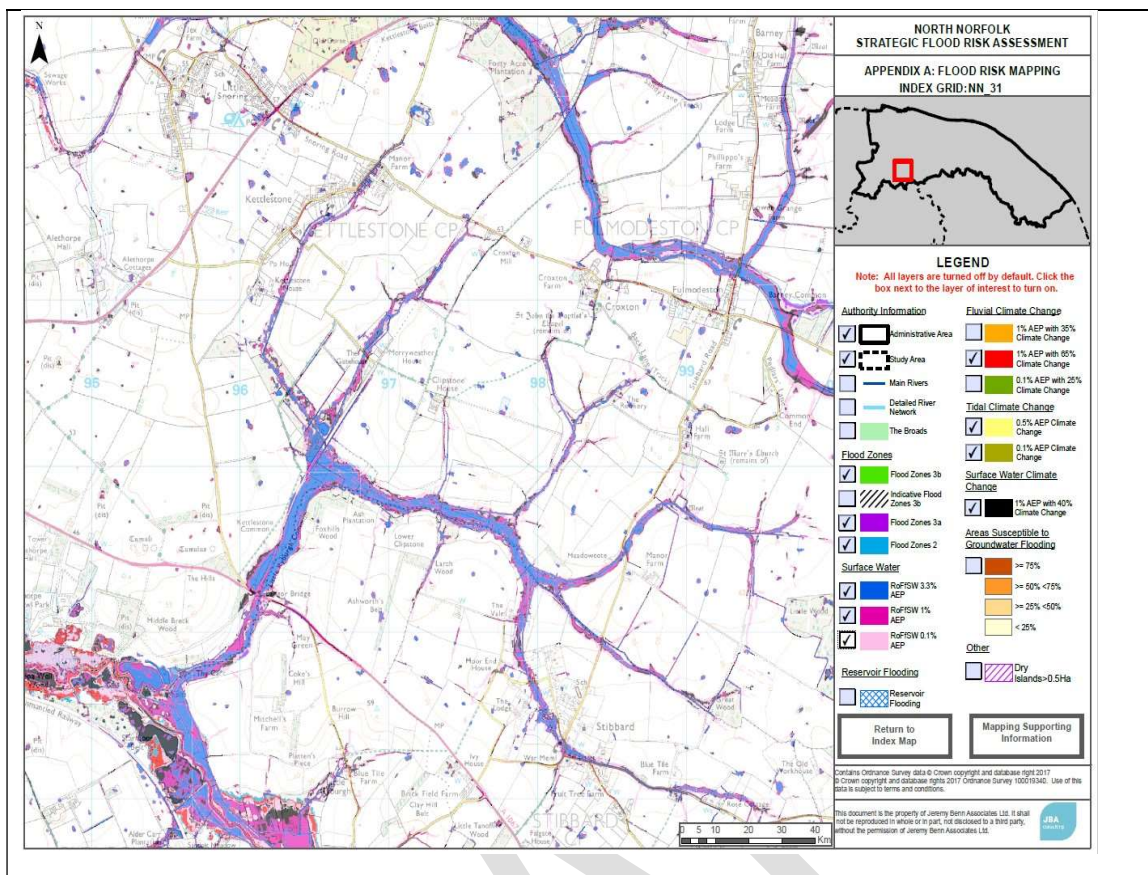
Stibbard

- 3.13 Stibbard was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 329 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities

Key Services	Primary School	Y	All Saints CE VA Primary School
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	

	Post Office	N*	* Mobile Post Office visits 1 hour per week
	Other Shopping	N	
	Public House/ Restaurant	Y*	The Ordnance Arms *located outside settlement boundary.
	Meeting Place (e.g. Village Hall)	Y	Stibbard Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	All Saints Church and Stibbard Methodist Church Centre
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> • Grade II* - All Saints Church • Grade II – The Grove, Grove Barn, Holly Farmhouse, The Lodge, Vale Farm. 			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village falls within flood zone 1. There is surface water flooding associated with the local watercourse that flows through the village from the north and turns east.</p>			



Coastal erosion

N/A

Environmental designations

- Fulmodeston Several CWS approximately 1.6km to the west.
- Land north of Guist Bottom approximately 1km to the south.
- River Wensum SAC, SSSI approximately 1.9km to the northwest.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Tributary Farmland landscape type with an area of River Valleys landscape type to the north of the village.

The Tributary Farmland landscape character type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggest, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape character area is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within

the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valleys (Wensum and Tributaries) landscape type provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views. The Wensum is the largest river in the District, with a typical wide valley floor and low, often indistinct, valley sides. The town of Fakenham and the extended village of Hempton effectively meet at the valley floor and there is a complex interplay of settlement, riverine, industrial and surprisingly high quality ecological land types within a very small and discrete area.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Stibbard All Saints CE VA Primary School – potential future need for additional provision, monitored through Local Plan.
- Accessibility – C roads/ unclassified roads.
- Nutrient Neutrality Foul Water Drainage Catchment – River Wensum.
- Nutrient Neutrality Surface Water Catchment - River Wensum.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Stibbard is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Stibbard.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed

property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as of 15th August 2024, 634 people on the housing waiting list expressed a preference to live in Stibbard.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 3 potentially suitable sites totalling 93 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Stibbard has one key service and three secondary/ desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration any environmental constraints, including the historic built environment and known infrastructure constraints. However, for Stibbard it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

Swanton Abbott

- 3.14 Swanton Abbott was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 541 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y*	Swanton Abbott Community Primary School (and Pre-School) *approx. 500m to the north of the village (can be accessed by footpath Swanton Abbott FP3)
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	N	
	Meeting Place (e.g. Village Hall)	Y	Swanton Abbott Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y*	Swanton Abbott Community Chapel St. Michael's Church

			*located approx. 500m to north of the village
	Employment Land	N	

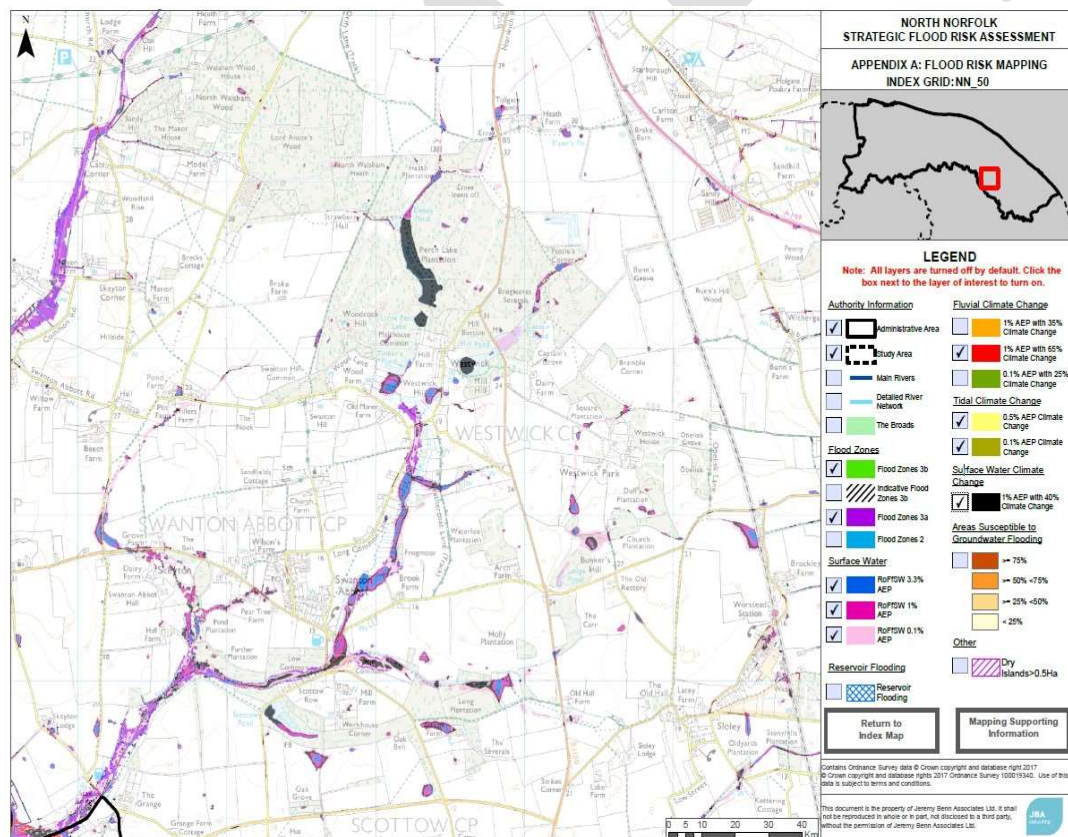
Built Environment

- Grade II* - St.Michael's Church
- Grade II – War Memorial at St. Michael's Church, Lilac Farmhouse.
- Westwick House, unregistered Historic Park and Garden (HPGU/15) is located approximately 1.4km to the east.

Natural Environment

Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the east, south and west by areas in flood zones 2 and 3a and surface water in association with Westwick Beck and Stake bridge Beck. The village is largely within flood zone 1.



Coastal erosion

N/A

Environmental designations

- Low Common & Plantations County Wildlife Site (CWS) approximately 150m to the south.
- Westwick Estate Meadow CWS approximately 300m to the east/ northeast.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the main part of the village is situated within the Low Plains Farmland landscape type with the River Valleys landscape type running across the southern part the village from northeast to southwest following Westwick Beck.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.
- Nutrient Neutrality Foul Water Drainage Catchment – River Bure.
- Nutrient Neutrality Surface Water Catchment - River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Swanton Abbott is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Swanton Abbott.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 678 people on the housing waiting list expressed a preference to live in Swanton Abbott.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 4 potentially suitable sites totalling 164 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Swanton Abbott has one key service and two secondary/ desirable services.
- There are limited Environmental and Infrastructure constraints.

- There is moderate housing need demand and lower land availability.

The settlement does not meet the criteria of a 'Small Growth Village', based on the methodology using a revised Stage 3 requirement for one key service and three secondary or desirable services. As such, the village of Swanton Abbott is identified as being in the '**Countryside**' for the purposes of Policy SS1.

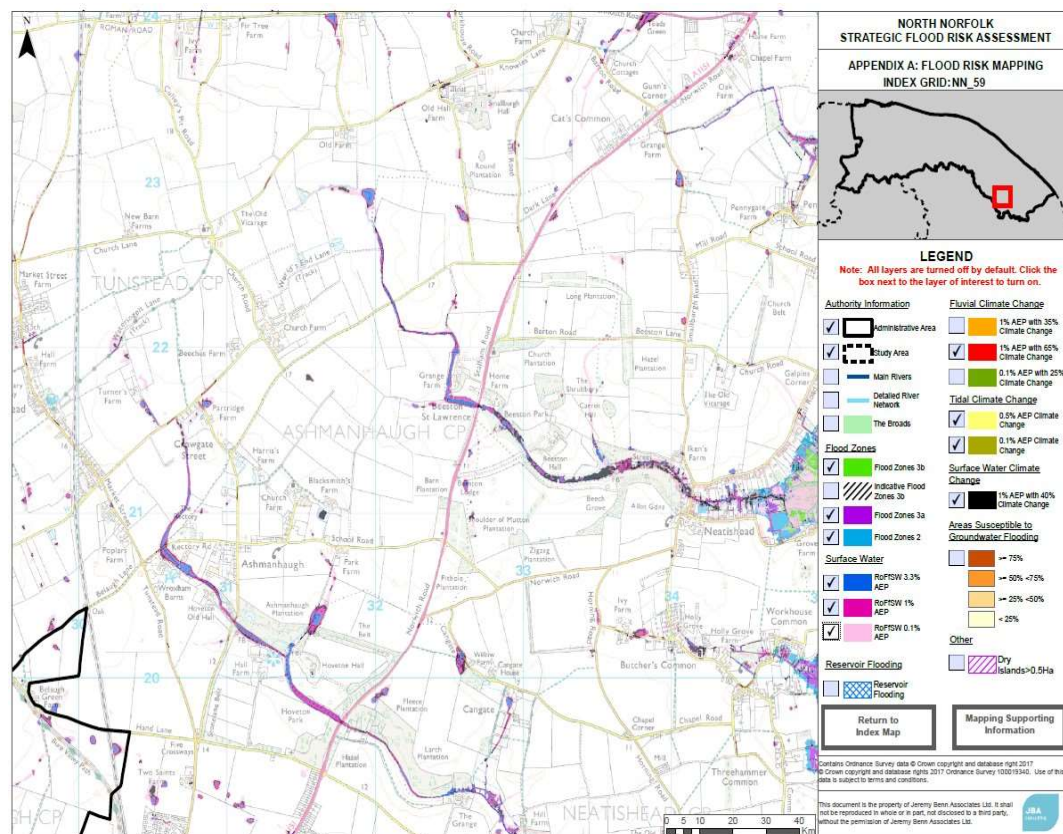
Tunstead

- 3.15 Tunstead was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 1,083 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
Key Services	Primary School	Y	Tunstead Primary School
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N	
	Post Office	N	
	Other Shopping	N	
	Public House	Y	Horse & Groom
	Meeting Place (e.g. Village Hall)	Y	Tunstead Village Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y*	St. Mary the Virgin Church *outside settlement boundary.
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> • Grade I – St. Mary's Church • Grade II – Tunstead War Memorial, The Manor House, The Hall. 			
Natural Environment			

Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village lies within flood zone 1. There are small pockets of surface water flooding predominantly along the road through the village.



Coastal erosion

N/A

Environmental designations

N/A

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type with an area of River Valleys landscape type to the south of the village.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Accessibility C roads/ unclassified roads.
- Nutrient Neutrality Foul Water Drainage Catchment – River Bure.
- Nutrient Neutrality Surface Water Catchment - River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Tunstead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Tunstead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43%

respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 734 people on the housing waiting list expressed a preference to live in Tunstead.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) did not identify any potentially suitable sites.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Tunstead has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and no known land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration any environmental constraints, including to the historic built environment and known infrastructure constraints. However, for Tunstead it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan

proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

Worstead

3.16 Worstead was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 972 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

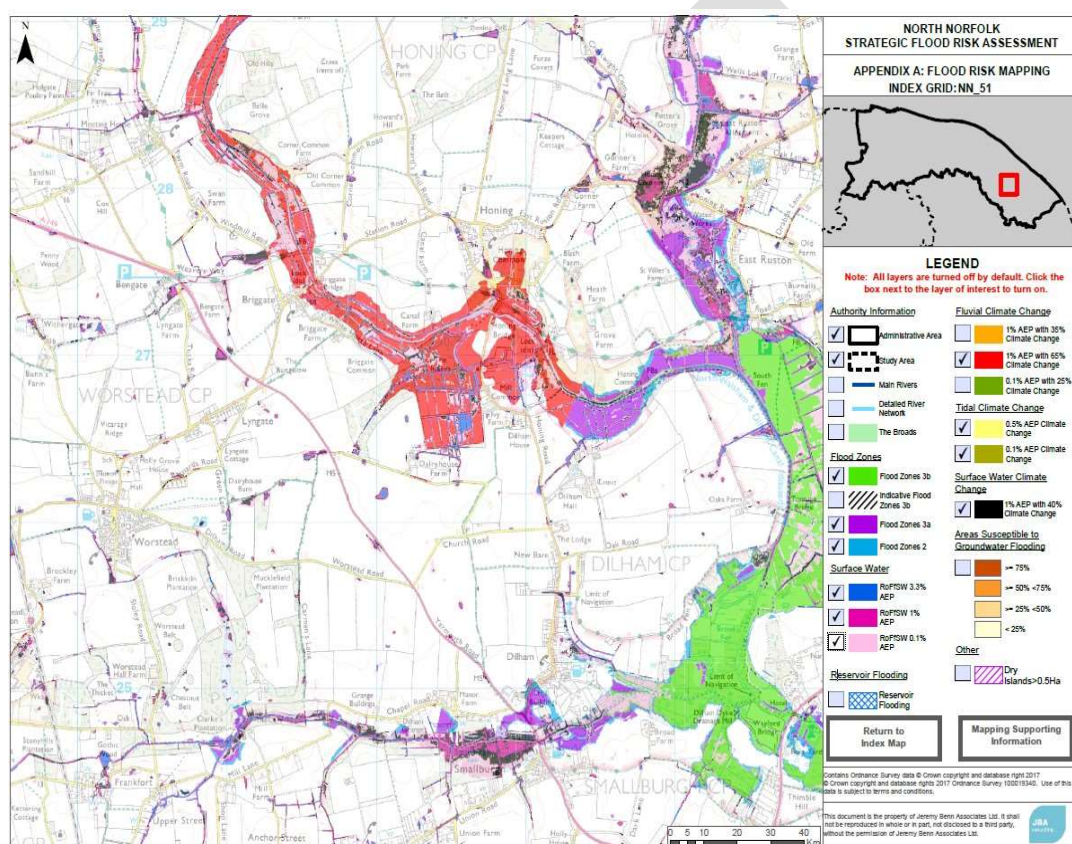
Services and Facilities			
Key Services	Primary School	Y*	Worstead Primary School *approx.200m north of settlement boundary with footpath accessibility.
	Convenience Shopping	N	
	GP surgery	N	
Secondary Services	Main Road	N*	*Worstead Train Station approx. 1.1km southwest of settlement by road.
	Post Office	N*	*Mobile post office visits 1 hour per week
	Other Shopping	N	
	Public House	Y	The White Lady
	Meeting Place (e.g. Village Hall)	Y	Queen Elizabeth Hall
Desirable Services	Petrol Filling Station	N	
	Vehicle Repair Shop	N	
	Place of Worship	Y	Saint Mary the Virgin Church
	Employment Land	N	
Built Environment			
<ul style="list-style-type: none"> Worstead Conservation Area covers the historic core of the village adjacent to St. Mary's Church and incorporates the majority of buildings to the north, east and south of the church. Grade I – St. Mary's Church 			

- Grade II* - St. Andrew's Cottage
- Grade II – The Thatched House, Wall at & the Manor House, Geoffrey The Dyer House, Norwich House & Outbuilding, The White Lady, Telephone Kiosk.
- No locally listed buildings.

Natural Environment

Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village falls within flood zone 1. There are small pockets of areas susceptible to surface water flooding around the village and to the southwest.



Coastal erosion

N/A

Environmental designations

- Westwick Park County Wildlife Site (CWS) approximately 1.3km to the west.
- Smallburgh Fen SAC, SPA, SSSI approximately 2.8km to the southeast.

Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type with an area of River Valleys landscape type closest to the southeast part of the village.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

The River Valleys (River Ant and Tributaries) character area provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.
- Settlement largely within nutrient neutrality small scale discharge – low risk zone.
- Nutrient Neutrality Surface Water Catchment -River Bure.

Housing Need and Land Supply

Housing Need

As part of the Plan Wide Viability Assessment, Worstead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Worstead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15th August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15th August 2024, 827 people on the housing waiting list expressed a preference to live in Worstead.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 2 potentially suitable sites totalling 42 dwellings*.

*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

Conclusion

- Worstead has one key service and three secondary or desirable services.
- There is moderate constraints given the number of listed buildings and conservation area status, with limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration environmental constraints, including to the historic built environment. However, for Worstead it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

This page is intentionally left blank

North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment

September 2024

RRR Consultancy Ltd



Table of Contents

Table of Contents.....	0
Executive Summary.....	2
<i>Introduction</i>	2
<i>Policy context</i>	3
<i>Accommodation need</i>	3
<i>Conclusions and recommendations</i>	5
1. Introduction	8
<i>Study context</i>	8
<i>Methodological context</i>	8
<i>Geographical context</i>	9
<i>Map of the study area</i>	10
2. Policy context.....	11
<i>Introduction</i>	11
<i>National policies</i>	11
<i>Definition context</i>	11
3. Trends in population levels	22
<i>Introduction</i>	22
<i>DLUCH Traveller Caravan Count</i>	24
<i>Data on unauthorised sites</i>	24
<i>Permanent residential pitches within the study area</i>	25
<i>Transit pitches</i>	25
<i>Travelling Showpeople</i>	26
4. Stakeholder consultation	28
<i>Introduction</i>	28
<i>Accommodation needs</i>	28
<i>Summary</i>	32
5. Gypsies and Travellers consultation	33
<i>Introduction</i>	33
<i>Requirement for permanent residential pitches for the first five years</i>	35
<i>Requirement for permanent residential pitches from 2029-2040</i>	40
<i>Requirements for transit pitches / negotiated stopping arrangements</i>	41
<i>Summary</i>	42
6. Conclusion and Recommendations.....	43
<i>Permanent accommodation needs</i>	43
<i>Transit provision</i>	43
Appendix 1: Example negotiated stopping place protocol	49
Bibliography	51
Glossary	53

Executive Summary

Introduction

- ES1. In 2024, North Norfolk District Council commissioned RRR Consultancy Ltd to undertake an updated Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) for the period up to 2040. The findings of this study will be used as an evidence base to support the ongoing Local Plan examination and supersedes any previous GTAA. Whilst the Submitted local plan period is 2016-36, the base date for the GTAA is September 2024 in line with the Inspectors changes to the plan period contained in his initial letter dated 24th May 2024, (released 19 July following the General Election and changed the plan period to 2024 – 2040 so that the plan remained forward looking over a 15-year period. It is important to note that this assessment includes accommodation need which may have been identified by previous GTAA's but remained unfulfilled by September 2024. Therefore, this assessment calculates needs from for the 15-year period to 2040 with the understanding that any need not addressed between the start of the plan period and September 2024 (the base date) will have been identified by this assessment.
- ES2. The requirement to assess the accommodation needs of Gypsies, Travellers, and Travelling Showpeople is established through national guidance contained in 'Planning Policy for Traveller Sites' (Department of Levelling Up, Communities and Local Government (DLUHC), December 2023). Throughout this report, this policy will be referred to as PPTS 2023 or simply PPTS unless referring to the previous PPTS.
- ES3. To achieve the study aims, the research drew on several data sources, including:
- Review of secondary information: a review of national and local planning policies, recently undertaken GTAA's, and secondary data analysis. This included an analysis of the most recently published (January 2024) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
 - Consultation with key stakeholders, providing qualitative data regarding the accommodation needs of the different community groups.
 - Consultation with Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- ES4. The above provided an extensive range of quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.

Policy context

- ES5. On 19 December 2023, the government announced changes to the Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of *Smith v SSLUHC & Others* (October 2022). The government intends to review this policy and case law area further in 2024. Like the 2015 update, the 2023 version will be read in conjunction with the National Planning Policy Framework.
- ES6. Whilst it is clear that the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- ES7. Given the differences in defining Gypsies and Travellers, this GTAA provides two accommodation needs figures: first, one based on the definition of ethnic identity; second, based on the definition of PPTS 2023. The two accommodation needs definitions are discussed in more detail in Chapter 2.
- ES8. In March 2016, the Department of Communities and Local Government (DCLG) published its *Review of housing needs for caravans and houseboats: draft guidance* to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that, when considering the need for caravans and houseboats, local authorities must include the needs of a variety of residents in differing circumstances, including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- ES9. According to the NPPF (2023) and related planning practice guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs and address the needs of groups with specific housing requirements. The NPPF (2023) refers to the need to assess and address the accommodation needs of those covered by the definition of the PPTS 2023.

Accommodation need

- ES10. There are 14 authorised pitches in the study area and 2 on unauthorised developments. There are also two transit pitches (owned by the local authority). There are no known Travelling Showpeople plots/ yards within North Norfolk.
- ES11. Table ES1 summarises permanent accommodation needs over the period 2024-2040. It is important to note that the figures shown in Table ES1 include all needs as of 2024,

including any which may have been identified by previous GTAA's but remained unfulfilled by the time of this assessment. The table shows that 11 new permanent Gypsy and Traveller pitches (based on the ethnic identity definition) and 9 new permanent pitches (based on PPTS 2023) are needed over the period 2024-2040 in the study area. Although the surveys undertaken with Gypsy and Traveller households asked about the preferred location of any new provision, respondents did not state any preference. They were more likely to state that they would prefer to remain close to family members already residing in the study area. Looking at the distances involved across the study area, anywhere within the study area.

Table ES.1: Gypsy and Traveller permanent accommodation needs

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

ES12. There are currently two pending applications – one for 3 pitches and another for 2 pitches. These will address 4 identified needs for the first five years and 1 for the second five-year period. Additionally, there is a site with the potential to intensify by 1 pitch. As a result, the need for pitches under the PPTS definition for the first five years will be fully met, leaving 2 pitches outstanding under the 'ethnic' category. These remaining needs can be best addressed through windfall applications, in accordance with the submitted policy approach HOU5 resulting in a revised assessment of need as follows:

Table ES.2: Indicative future Gypsy and Traveller permanent accommodation needs (assuming approval of the two pending applications)

Period	Ethnic definition	PPTS 2023 definition
2024-2029	1	0
2029-2034	2	1
2034-2040	2	2
Total	5	3

Source: GTAA 2024

ES13. In relation to transit provision, in addition to existing transit provision, this GTAA also recommends that the local authority adopt a negotiated stopping policy at the corporate level. This involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The advantages of this approach are set out in detail in Chapter 5.

Conclusions and recommendations

- ES14. The results from this assessment supersede any previous GTAA (including any accommodation need calculated prior to this assessment) for the local planning authorities. This assessment identifies that there is an overall accommodation need in the study area for the local plan period for 11 additional pitches (ethnic definition) and 9 pitches (PPTS 2023). There is no identified additional accommodation need for Travelling Showpeople.
- ES15. It is recommended that the authority adopts a negotiated stopping policy at the corporate level to provide for any additional capacity.
- ES16. This GTAA recommends that North Norfolk, in their local plan, adopt the 'ethnic' definition of accommodation needs figures, i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation needs of all Gypsies and Travellers but also how the accommodation needs concerning households not meeting the PPTS definition are being addressed. Since the Lisa Smith case (2022), there has been a greater emphasis on Gypsy and Travellers' ethnic identity than their travelling patterns (past or present).
- ES17. Alternatively, the local authority may adopt the 'PPTS 2023 definition accommodation needs figures, with the difference between the PPTS 2023 figures and 'Ethnic' definition being an additional need that the council(s) may choose to meet. This means that the local authority would first meet the need of 9 (5 within the first five years) as the obligation but accept the need of a further 2 (2 within the first five years) as a potential need if further applications are brought forward through windfalls.
- ES18. In addition to the identified need there may also be an additional element of unidentified need from households residing on unauthorised developments, unauthorised encampments, new households due to in-migration, and those residing in bricks and mortar accommodation who have not identified themselves as ethnic. It is recommended that a flexible policy criteria approach such as in the submitted Plan policy HOU5 is sufficient.
- ES19. In addition to the above, to meet the specific accommodation needs of the different community groups, the report recommends the following:
- Regarding the different community groups, it is recommended that the local authority continue to work closely with the families to determine how their accommodation needs can best be met.

- Also, for the local authority to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation needs.

ES20. It is recommended that the local authority reviews the planning status of any unauthorised developments and encourage appropriate applications.

ES21. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

- How the accommodation needs can be met through expansion of existing sites and new sites /yards.
- The delivery mechanisms such as being open to the development of sites on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the different community groups.
- Prior to action being taken against sites or yards being used without planning permission, the local authority, in partnership with landowners, occupants and relevant agencies (e.g. National Federation of Gypsy Liaison Groups and Showmen's Guild (local and national)), to review its current, historic and potential planning status, and review the most effective way forward.
- Implement a corporate policy providing negotiated stopping arrangements at agreed-upon locations to address unauthorised encampments for set periods of time.
- To liaise with owners of the sites to determine how they could expand the number of pitches to meet the family's accommodation needs when arise .
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change rapidly. As such, in line with Plan review requirements it is recommended that their accommodation needs should be reviewed every 5 to 7 years.
- Housing organisations need to consider allocating culturally appropriate housing to Gypsies and Travellers residing in bricks and mortar, for example, with sufficient space to accommodate a caravan.
- Develop a holistic vision for their work with the different community groups and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to understand further issues relating to the Gypsy and Traveller, and Showpeople communities.

- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies about Gypsy, Traveller and Showpeople communities.
- The population size and demographics of the Gypsy, Traveller and Showpeople communities can change. Their accommodation needs should be reviewed every 5 to 7 years.

1. Introduction

Study context

- 1.1 In 2024, North Norfolk District Council commissioned RRR Consultancy Ltd to undertake an updated Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) for the period up to 2040. The findings of this study will be used as an evidence base to support the ongoing Local Plan examination and supersedes any previous GTAA. Whilst the Submitted local plan period is 2016-36, the base date for the GTAA is September 2024 in line with the Inspectors changes to the plan period contained in his initial letter dated 24th May 2024, (released 19 July following the General Election and changed the plan period to 2024 – 2040 so that the plan remained forward looking over a 15-year period. It is important to note that this assessment includes accommodation need which may have been identified by previous GTAA's but remained unfulfilled by September 2024. Therefore, this assessment calculates needs from for the 15-year period to 2040 with the understanding that any need not addressed between the start of the plan period and September 2024 (the base date) will have been identified by this assessment.
- 1.2 The requirement to assess the accommodation needs of Gypsies, Travellers, and Travelling Showpeople is established through national guidance contained in the 'Planning Policy for Traveller Sites' (Department for Levelling Up, Housing and Communities (DLUHC), December 2023). Throughout this report, this policy will be referred to as PPTS 2023 or simply PPTS, unless referring to PPTS 2015.

Methodological context

- 1.3 To achieve the study aims, the research drew on several data sources including:
- Review of secondary information: a review of national and local planning policies, recently undertaken GTAA's, and secondary data analysis. This included an analysis of the most recently published (January 2024) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
 - Consultation with key stakeholders, providing qualitative data regarding the accommodation needs of the different community groups.
 - Consultation with Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- 1.4 The above provided extensive quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.

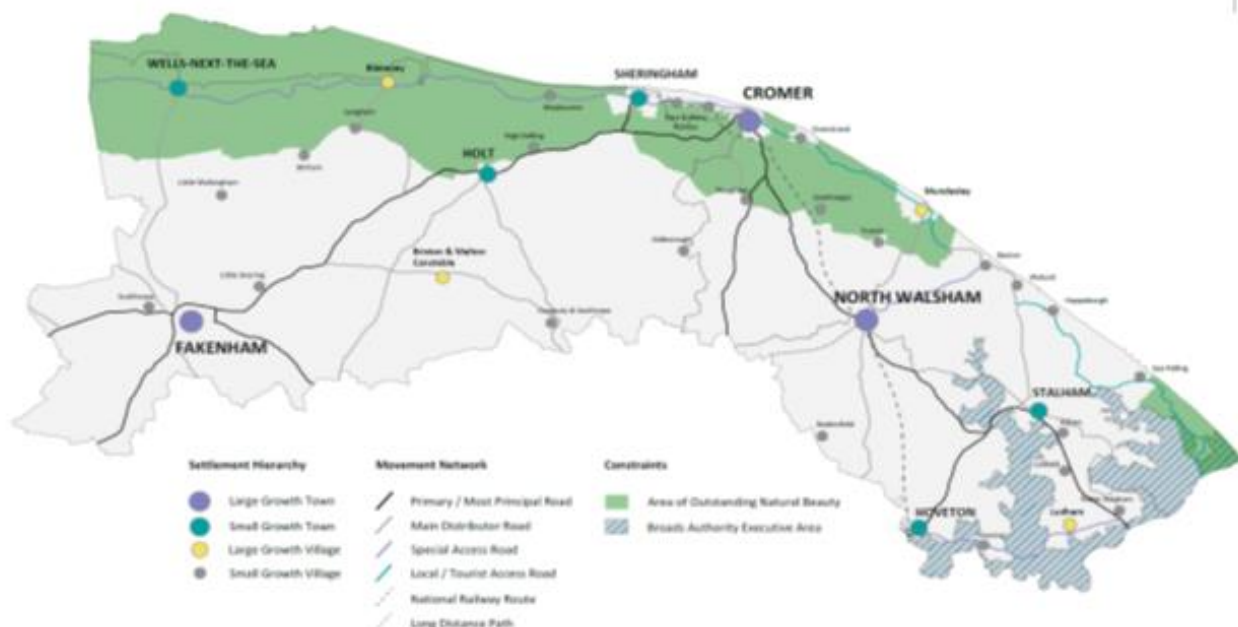
Geographical context

- 1.5 The estimated population of the North Norfolk is 103,200 people (ONS 2021). The North Norfolk District is a large rural area of some 87,040 hectares (excluding the Broads Authority Area) with approximately 43 miles of coastline situated on the northern periphery of the East of England region. The District is one of the most rural in lowland England, with the larger settlements distributed more or less evenly across the district and accommodating around half the population; the other half live in dispersed villages and hamlets throughout the rural area.
- 1.6 The nearby urban area and major economic, social and cultural centre of Norwich (Norwich Urban Area population of 213,166(7)) is situated some 22 miles to the south of Cromer and exerts a significant influence over parts of the District. The towns of Kings Lynn situated 20 miles to the west of Fakenham and Great Yarmouth situated 16 miles to the south-east of Stalham are the other principal neighbouring settlements, but their impact on the District is far more limited.
- 1.7 The main settlements in the District are its seven towns: Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham and Wells-next-the-Sea, along with Hoveton and a further four large villages; Blakeney, Briston / Melton Constable, Ludham and Mundesley. These settlements are distributed more or less evenly across the District, and accommodate around half of the population. The other half live in the large number of smaller villages, hamlets and scattered dwellings which are dispersed throughout a large rural area. Overall the District is one of the most rural in lowland England.
- 1.8 The economy of North Norfolk remains fairly narrowly based with a relatively high dependence upon employment in the agriculture, retail, public services and tourism sectors. The local economy is particularly characterised by the fact that the majority of employees (84%) work in small businesses. Whilst there has been a change in the business base of the manufacturing sector with business closures / rationalisations in the food processing and engineering sectors in recent years, there has been a growth in employment in the manufacture of plastic and timber products and marine engineering / boat-building, which continue to perform strongly.
- 1.9 Significant numbers of employees in the District are engaged in the provision of education, health and social care, public administration, retailing and tourism. In recent years the tourism sector has enjoyed growth through investment in quality accommodation and attractions, and a move to year-round operations capturing short breaks and specialist markets, in addition to the traditional summer holiday.
- 1.10 Whilst most of North Norfolk's towns have small industrial estates, the main concentration of manufacturing employment is in Fakenham and North Walsham. Cromer, Mundesley, Sheringham and Wells-next-the-Sea are traditional destination resorts, and Hoveton acts as an important centre for Broads-based tourism.

Map of the study area

1.11 A map of the study area is shown in Figure 1.1 below.

Figure 1.1: Study area



Source: Submitted version North Norfolk Local Plan 2016-2036, January 2022, p.14

Summary

- 1.12 The purpose of this assessment is to quantify the accommodation needs of Gypsies, Travellers, and Travelling Showpeople in North Norfolk between 2024 to 2040. This is in terms of permanent pitches, sites, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. This report will form part of the evidence base for the Local Plan review.
- 1.13 To achieve the study aims, this report focusses on the assessment of accommodation need for Gypsies and Travellers and Travelling Showpeople. The research provides a range of quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.

2. Policy context

Introduction

- 2.1 To assess the current policy context, existing documents have been examined to determine what reference is made to Gypsy, Traveller, and Travelling Showpeople issues.
- 2.2 The intention is to summarise key national and local policies and examine the findings of GTAAAs recently undertaken by neighbouring authorities. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation needs and housing-related support needed among Gypsies and Travellers and Travelling Showpeople.

National policies

National Planning Policy Framework (December 2023)

- 2.3 According to NPPF (2023) and related planning practice guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs and address "the needs of groups with specific housing requirements. The NPPF (2023) refers to the need to both assess and then address the accommodation needs of those who are covered by the definition of the PPTS 2023. The Human Rights Act 1998 and Equality Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan. This GTAA considers the accommodation needs of Gypsies and Travellers who identify as such, irrespective as to whether they have permanently or temporarily ceased to travel (i.e. those who meet the 'ethnic' definition), as well as those who meet the PPTS 2023 definition.

Definition context

- 2.4 On 19 December 2023, the government announced changes to Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. The key difference between the PPTS published in August 2015 and the December 2023 version primarily involves changes made in response to a recent legal judgment and ongoing policy reviews.
- 2.5 In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022). The government intends to review this area of policy and case law further in 2024.

- 2.6 The 2015 update involved changes to PPTS that were based on policies contained within the government response to a consultation on planning and travellers. Like the 2023 update, the 2015 version was to be read in conjunction with the National Planning Policy Framework.
- 2.7 The key difference between PPTS 2015 and 2023 is that the former removed the word 'permanent' from the planning definition of Gypsies and Travellers. This meant that local planning authorities were not obliged to consider the accommodation needs of Gypsy and Traveller households who had permanently ceased to travel:

PPTS 2015:

For the purposes of this planning policy, "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' **educational or health needs or old age have ceased to travel temporarily**, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. (our emphasis)

- 2.8 However, the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that PPTS was discriminatory by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. In response, the government amended the definition by reinserting the word 'permanent':

PPTS 2023¹:

For the purposes of this planning policy, "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' **educational or health needs or old age have ceased to travel temporarily or permanently**, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. (our emphasis)

- 2.9 The DLUHC definition of Travelling Showpeople is:

Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age

¹ MHCLG, 'Planning Policy for Traveller Sites' December 2023 at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.

- 2.10 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equality Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as ‘travelling showpeople’, Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority².
- 2.11 For the purposes of this planning policy, “Travellers” means “Gypsies and Travellers” and “Travelling Showpeople” as defined above from PPTS annex 1. Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAAAs), Travelling Showpeople are included under the definition of ‘Gypsies and Travellers’ in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the Review of housing needs for caravans and houseboats: draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It recommends that Travelling Showpeople’s own accommodation needs and requirements should be separately identified in the GTAA. This GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG ‘Planning Policy for Traveller Sites’ (December 2023) (see above).
- 2.12 It is important to note that Gypsies and Travellers and Travelling Showpeople have separate accommodation needs and requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. In addition to space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.
- 2.13 The 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family’s or dependants’ educational or health needs or old age have ceased to travel; it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes. Also, the 2023 PPTS does not require the need to assess the accommodation needs of Gypsy and Traveller households who have ceased to travel temporarily or permanently but *not* due to education or health needs or old age. Ethnic need is based on all households who identify as Gypsies and Travellers (as protected by the Equality Act 2010) irrespective as to whether they travel or not.

² DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

- 2.14 Whilst the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.15 One interpretation is that 'a nomadic habit of life' means travelling for an economic purpose. Previous case law e.g. *R v Shropshire CC ex p Bungay* (1990) and *Hearne v National Assembly for Wales* (1999) has been used to support this point. There is nothing within PPTS 2015 which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling.
- 2.16 More recent Planning Inspectors' reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a 2016 planning appeal decision regarding a site at Throcking, Hertfordshire, concluded the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence "that he is currently a person of a nomadic habit of life"³ for employment purposes (i.e. he did not meet the August 2015 PPTS definition).
- 2.17 In contrast, some other Planning Inspectors' reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010⁴.
- 2.18 Similarly, a local authority rejected a planning application as it determined that the household did not meet the PPTS 2015 definition. However, despite evidence that the family had reduced the extent to which they travel due to educational requirements, the Planning Inspector allowed the s78 appeal on the basis that they should be regarded as Gypsies for planning purposes⁵. Also, in deciding whether to allow an S78 appeal for a site in West Kingsdown, Kent, the Planning Inspector acknowledged that the local authority included within its future calculations the accommodation needs (in terms of pitches) of 'cultural' Gypsies and Travellers⁶.
- 2.19 Much case law precedes the December 2023 definition and even the 2015 definition. The commonly cited *R v South Hams DC ex parte Gibb et al.* judicial decision was

³ Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire SG9 9RD, 6 December 2016.

⁴ Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

⁵ Appeal Ref: APP/U2235/W/18/3198435 Ten Acre Farm, Love Lane, Headcorn TN27 9HL 9 May 2019.

⁶ Appeal Ref: APP/G2245/W/17/3170535 Land north-west of Eagles Farm, Crowhurst Lane, West Kingsdown, Kent TN15 6JE 27 November 2018.

undertaken in response to the now partly repealed Caravan Sites Act 1968. Also, it is increasingly recognised that defining Gypsies and Travellers in terms of employment status may contravene human rights legislation. For example, in 2003, the Welsh Assembly's Equality of Opportunity Committee noted the following:

‘...apparent obsession with finding ways to prove that an individual is not a 'Gypsy' for the purposes of the planning system. This approach is extremely unhelpful...and there can be no doubt that actual mobility at any given time is a poor indicator as to whether someone should be considered a Gypsy or a Traveller’⁷.

- 2.20 In September 2019, the Equality and Human Rights Commission published research into the impact of the PPTS 2015 definition on assessing accommodation needs⁸. The research examined a sample of 20 GTAAAs undertaken since the August 2015 revised definition. The report found that there had been a 73% reduction in accommodation needs in post-2015 GTAAAs compared to pre-2015 GTAAAs undertaken by the same local planning authorities.
- 2.21 Importantly, on 31 October 2022, the Court of Appeal determined that PPTS 2015 was discriminatory in relation to excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. The case relates to Lisa Smith, who resides on a site occupied by Ms Smith, her husband, their children and grandchildren. Two of Ms Smith's adult sons are severely disabled and cannot travel for work. The judgment determined that PPTS 2015 characterises nomadic Gypsies and Travellers as different from Gypsies and Travellers who, as a result of age or disability, are no longer able to travel. This creates sub-classes of ethnicity which ‘seems to sit uneasily with the stated aim of PPTS 2015 to facilitate the “traditional” way of life” of Gypsies and Travellers, and not simply the “nomadic” way of life’. The judgement concluded that the objective of PPTS 2015 in excluding households from being defined as Gypsies and Travellers was not ‘fairness’.
- 2.22 Given the above, our approach is to use a methodology that provides an accommodation need figure based on ethnic identity and, second, a figure based on the PPTS (2023). Providing two accommodation needs figures – one based on the PPTS 2023 and another using a cultural definition, assessing accommodation needs regardless of whether they travel or not – complies with both PPTS 2023 and the Equality Act 2010. This approach acknowledges the distinctions between planning definitions under PPTS 2023 and broader cultural identities, ensuring that all relevant

⁷ Welsh Assembly 2003 cited in Johnson, Murdoch and Willers, *The Law Relating to Gypsies and Travellers*, no date).

⁸ Equality and Human Rights Commission, *Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs*, Research Report 128, September 2019 located at: https://www.equalityhumanrights.com/sites/default/files/190909_gypsy_and_traveller_sites_-_impact_of_the_revised_definition_-_final.pdf

accommodation needs are considered, thereby aligning with legal obligations under the Equality Act to avoid discrimination and promote equality.

- 2.23 Different GTAA's reach differing conclusions on which approach/definition to adopt, and local authorities decide individually which approach to take for planning purposes. It is recommended that this be kept under review in light of evolving appeal decisions and case law. This GTAA recommends adopting the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed. An alternative is the adoption of the PPTS figure and for the difference between the PPTS and ethnic based need to be covered by a criteria-based policy.

*DCLG Review of housing needs for caravans and houseboats: draft guidance (March 2016)*⁹

- 2.24 The 2016 DCLG draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats states that when considering the need for caravans and houseboats local authorities should include the needs of a variety of residents in differing circumstances, for example:
- Caravan and houseboat dwelling households:
 - who have no authorised site anywhere on which to reside
 - whose existing site accommodation is overcrowded¹⁰ or unsuitable, but who are unable to obtain larger or more suitable accommodation
 - who contain suppressed households who are unable to set up separate family units and
 - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
 - Bricks and mortar dwelling households:
 - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

⁹ See <https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance>

¹⁰ Overcrowding e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its caravan accommodation and insufficient space on the pitch or site for a further caravan (DCLG 2007 p.25)

- 2.25 Importantly, with respect to this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Age Travellers, and Travelling Showpeople.
- 2.26 The guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:
- their nomadic or semi-nomadic pattern of life
 - their preference for caravan and houseboat-dwelling
 - movement between bricks-and-mortar housing and caravans or houseboats
 - their presence on unauthorised encampments or developments.
- 2.27 Also, it suggests that as mobility between areas may have implications for carrying out an assessment, local authorities should consider the following:
- co-operating across boundaries both in carrying out assessments and delivering solutions
 - the timing of the accommodation needs assessment
 - different data sources.
- 2.28 Finally, the DCLG draft guidance (2016) states that, in relation to Travelling Showpeople, account should be taken of the need for storage and maintenance of equipment as well as accommodation and that the transient nature of many Travelling Showpeople should be considered.

Housing and Planning Act 2016

- 2.29 The Housing and Planning Act 2016, which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, the DCLG ‘Planning Policy for Traveller Sites’ (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.30 The Housing and Planning Act 2016 requires Local Housing Authorities (LHAs) to consider the needs of people residing in places on inland waterways where houseboats can be moored. The term ‘houseboat’ is not defined by DCLG guidance. As such, the GTAA adopts the National Bargee Travellers Association’s (NBTA) definition, who define a boat dweller as:

“Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932”.

Local Planning Policies

Submitted North Norfolk Local Plan

2.31 Policy HOU 5 ('Gypsy, Traveller & Travelling Showpeople's Accommodation') of the North Norfolk Local Plan¹¹ states that development that meets the identified needs of Gypsies and Travellers and of Travelling Showpeople will be permitted provided that it is of an appropriate scale and nature and that it complies with all of the following criteria:

- a) the intended occupants meet the definition of Gypsies and Travellers, or the description of Travelling Showpeople;
- b) development minimises impact on the surrounding landscape;
- c) safe vehicular access to the public highway can be provided and the development can be served by necessary utilities infrastructure;
- d) the movement of vehicles to and from the site will not result in any unacceptable impact on the capacity of the highway network;
- e) there is adequate space for parking, turning and servicing on site;
- f) the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities;
- g) suitable landscaping, boundary enclosures and screening are provided to give privacy, minimise impact on the character and amenities of the surrounding area and neighbouring settled community;
- h) proposals should include any additional uses intended to be carried out from the site.

2.32 It also states that Conditions will be used to control the nature and level of non-residential uses on the site¹². It is understood at the time of writing that following the earlier hearing sessions there are no proposed modifications at this time

¹¹ North Norfolk Local Plan Proposed submission version publication stage regulation 19 January-2022.

¹² North Norfolk Local Plan Proposed submission version publication stage regulation 19 January-2022 p.123.

Duty to cooperate and cross-border issues

- 2.33 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Also, the need for councils to cooperate reflects the characteristic that Gypsy and Traveller travelling patterns transcend local authority borders¹³.
- 2.34 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.
- 2.35 As part of this assessment, consultation in relation to Gypsies, Travellers and Travelling Showpeople and boat dwellers, was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in Chapter 4.
- 2.36 Given the transient nature of Gypsies and Travellers it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section summarises the results of GTAA's recently undertaken by both the local authority which has commissioned this assessment, and neighbouring or nearby local authorities, specifically in relation to accommodation needs and travelling patterns (see Figure 1.1 'Study Area Map' above for authorities bordering the study area).

Breckland GTAA 2024

- 2.37 The GTAA was undertaken by RRR Consultancy on behalf of the Breckland Council. The overall accommodation need in the study area for the local plan period (2024-2046) for 71 additional pitches (ethnic definition), and 66 pitches (PPTS 2023). The ethnic need includes the 66 who meet the PPTS definition and the 5 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. There is no identified additional accommodation need for Travelling Showpeople.

Greater Yarmouth and Broads Authority GTAA 2022

- 2.38 The GTAA was undertaken by RRR Consultancy on behalf of the Greater Yarmouth and Broads Authority. Over the period 2022-2041, the GTAA found a need for a further 18 Gypsy and Traveller pitches (based on the ethnic identity definition), and 16 pitches

¹³ It should be noted that the government's white paper 'Planning for the Future' (August 2020) indicated that it intended to abolish the duty to cooperate.

(based on PPTS 2015) are needed over the 19-year period. The ethnic need includes the 16 who meet the PPTS definition and the 2 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. There are no known supply or need for plots in relation to Showpeople in the area. In relation to transit provision, it is recommended that the local authorities set up a corporate negotiated stopping places policy to address transit provision.

Broads Authority BDAA 2022

- 2.39 The BDAA was undertaken by RRR Consultancy on behalf of the Broads Authority. Over the period 2021-2041 the BDAA found that a further 48 permanent residential moorings are needed and a review of the short term moorings.

Greater Norwich GTAA 2022

- 2.40 The GTAA was undertaken by RRR Consultancy on behalf of Broadland District Council, Norwich City Council, and South Norfolk District Council. Over the period 2022-2038, the GTAA found a need for a further 50 Gypsy and Traveller pitches (based on the ethnic identity definition), and 29 pitches (based on PPTS 2015) are needed over the 16-year period. The ethnic need includes the 29 who meet the PPTS definition and the 21 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. The GTAA also identified a need for 43 additional Travelling Showpeople plots over the 16-year period. In relation to transit provision, it is recommended that the local authorities set up a corporate negotiated stopping places policy to address transit provision.

Kings Lynn and West Norfolk GTAA 2023

- 2.41 The GTAA was conducted on behalf of Kings Lynn and West Norfolk. It identified an overall accommodation need in the study area for the local plan period (2024-2046) of 102 pitches for those who meet the PPTS definition, 6 for those whose planning status is unknown, and 48 for those who do not meet the planning definition. This results in a total ethnic accommodation need of 156 pitches over the period 2023-2040. Additionally, there is a requirement for 6 more plots for Travelling Showpeople during the same period.

Norfolk GTAA 2017

- 2.42 The GTAA was undertaken by RRR Consultancy on behalf of Broadland District Council, Breckland Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council), alongside the Broads Authority. Over the period 2017-2036, the GTAA found a need for 73 additional pitches for all households ethnically identified as Gypsies or Travellers, or 41 pitches based only on families who travel for work. The GTAA also found a need for 46 plots for Travelling Showpeople, 63 boat moorings, and 140 pitches for non-Gypsy and Traveller households residing permanently on residential pitches. In relation to transit provision, there is no need for provision for Travelling Showpeople. In relation to boat dwellers, it was recommended

that the 24-hour moorings be made available for longer periods of time during out-of-season periods. With regard to Gypsies and Travellers, it was recommended that each of the four authority areas implement a negotiated stopping place policy. This assessment is an update to this for The Broads Authority and Breckland Borough Council. See Greater Norwich 2022 for Broadland District Council, Norwich City Council and South Norfolk District Council. North Norfolk is updating their GTAA's (due for publication later this year).

Summary

- 2.43 DLUHC's 'Planning Policy for Traveller Sites' (December 2023) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.44 The GTAA is based on a methodology which provides, first, an accommodation need figure based on ethnic identity; and, second, a figure based on the PPTS (December 2023). Local planning policies regarding the provision of new Gypsy, Traveller and Showpeople are outlined in Policy HOU5 of the Local Plan (2022), which outlines the criteria used to determine suitable locations for new sites and yards.
- 2.45 Given the cross-boundary characteristic of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAA's produced by neighbouring local authorities. GTAA's recently undertaken by neighbouring local authorities indicate that there remain some Gypsy and Traveller accommodation needs throughout the region, but none have suggested a need arising in their area should be met within the study area.

3. Trends in population levels

Introduction

- 3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the DLUHC Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the DLUHC on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation needs.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country, counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of caravans (tourer and static caravans) so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches/households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about the numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The DLUHC Count includes data concerning Gypsies and Travellers sites¹⁴. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from July 2021 to January 2024.

¹⁴. Data regarding Travelling Showpeople is published separately by the DLUHC as 'experimental statistics'.

Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown, although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people¹⁵. There are uncertainties partly because of the number of different definitions that exist but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks-and-mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DLUHC. Due to Covid-19 restrictions, the Count did not occur in July 2020 or January 2021. The January 2024 Count (the most recent published figures) indicates 26,632 caravans. Applying an assumed three person per caravan¹⁶ multiplier would give a population of 79,896 persons.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing¹⁷, gives a total population of 159,792 persons for England. However, given the limitations of the data, this figure can only be very approximate and may be a significant underestimate.
- 3.9 The 2021 national census included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. Table 3.1 below shows the total population and Gypsy and Traveller population as derived from the 2021 Census. It shows that in March 2021, there were 86 Gypsies and Travellers residing in North Norfolk, representing around 0.08% of the usual resident population.¹⁸ This is below both the average for the East of England (0.14%) and England & Wales (0.11%).

Table 3.1 Gypsy and Traveller Population (2021)

	Population (no.)	G&T Pop (no.)	G&T Pop (%)
North Norfolk	102,978	86	0.08%
East of England	6,335,075	8,974	0.14%
England	59,597,578	67,757	0.11%

Source: Census 2021 cited by NOMIS 2023

- 3.10 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2021 Census data, Table 3.2 shows the housing type of Gypsy and Traveller households. Just under a fifth (18%) of Gypsy and Traveller

¹⁵ The House of Lords 'Inequalities Faced by Gypsy, Roma and Traveller Communities' (25 February 2020) provides useful links regarding inequalities faced by the GRT community.

¹⁶ Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

¹⁶ Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

¹⁸ See ONS 2021 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

households living in North Norfolk were recorded as residing in a caravan or other mobile home, whilst just over four fifths (82%) were recorded as residing in bricks and mortar accommodation. This compares with a third (33%) of Gypsy and Traveller households in the East of England region living in a caravan or other mobile home and a fifth (20%) in England.

Table 3.2 Gypsy and Traveller households by tenure

	A caravan or other mobile		Bricks and mortar		Total	
	No.	%	No	%	No	%
North Norfolk	5	18%	23	82%	28	100%
East England	137	33%	284	67%	421	100%
England	4,598	20%	17868	80%	22,466	100%

Source: Census 2021 cited by NOMIS 2023

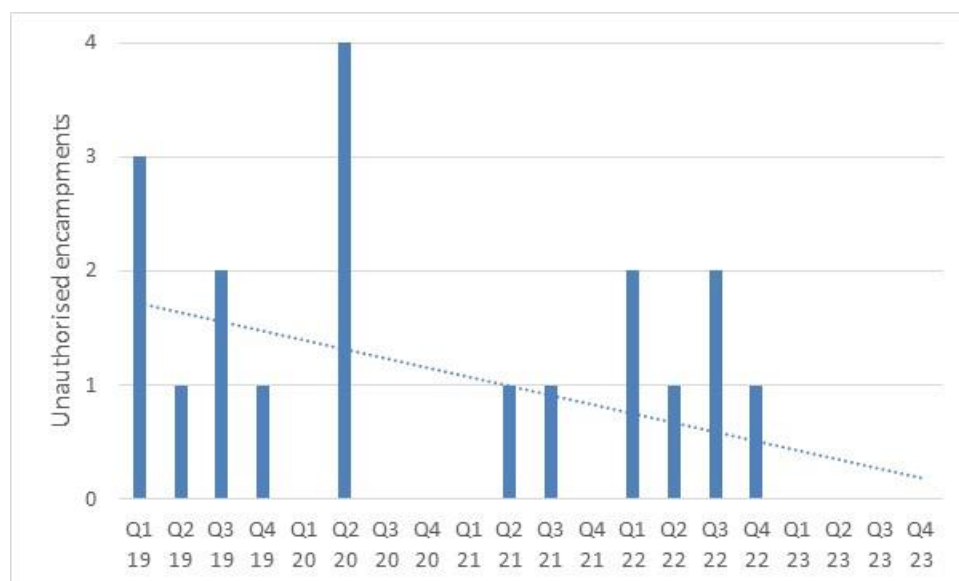
DLUCH Traveller Caravan Count

- 3.11 No caravans were recorded in North Norfolk by the January 2024 Caravan Count although an average of four caravans were recorded on authorised pitches between July 2021 and July 2022. However, given the number of pitches in the district (see para. 3.13), it is likely that this represents an undercount of Gypsy and Traveller caravans in the district.

Data on unauthorised sites

- 3.12 North Norfolk District Council records data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission). Figure 3.1 shows the number of caravans recorded between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24 in North Norfolk. It shows that over the 5-year period there was a total of 20 unauthorised encampments in the district with an average of 1 per quarter (although some quarters recorded no unauthorised encampments including none in 2023/24 compared to a peak of 4 in Q2 2020/21). The dotted trend line shows that, on average, the number of unauthorised encampments recorded in North Norfolk declined between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24. On average, 2 caravans were recorded on each unauthorised encampment.

Figure 3.1 Unauthorised encampments in North Norfolk Q1 2019/20 to Q4 2023/24



Source: Jan 2024 DLUHC Traveller Caravan Count

Permanent residential pitches within the study area

- 3.13 As Table 3.3 shows that there are a total of 14 authorised pitches in the study area and 2 on unauthorised developments. There are no local authority-owned permanent sites, but there are 2 local authority owned and managed transit sites with 20 pitches. This information was clarified by site visits, council data, and consultations with households and stakeholders.

Table 3.3 Study area Gypsy and Traveller pitches

	Private pitches	LA pitches	Temp pitches	UD pitches	Total
Total	14	0	0	2	16

Source: GTANA 2024

Transit pitches

- 3.14 There are two short-stay stopping places for Gypsies and Travellers provided by North Norfolk District Council including 10 transit pitches located at Holt Road, Cromer, next to the District Council offices, and 10 transit pitches at the site south of the A148 Holt Road, north-east of Fakenham, 300 metres east of the Clipbush Lane/Fakenham bypass roundabout. Figure 3.2 shows that the number of caravans using the Cromer and Fakenham transit sites declined between 2017 and 2023. However, Covid-19 restrictions may have impacted on usage of the transit sites during 2020 and 2021. Also, both transit sites are in poor condition meaning that Gypsy and Traveller households may be discouraged from using them.

Figure 3.2 Use of transit sites in North Norfolk 2017 to 2023

Travelling Showpeople

- 3.15 The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot. There are no known Travelling Showpeople plots or yards in the area. There are visiting Showpeople events (fairs and circus events) and also Showpeople living in bricks and mortar with yards used for storing their equipment and others who live in bricks and mortar who own and manage stationary venues (such as amusements and static fairground rides) within the area.

Summary

- 3.16 The 2021 Census indicates that there are 86 Gypsies and Travellers residing in North Norfolk, representing around 0.08% of the usual resident population.¹⁹ This is below both the average for the East of England (0.14%) and England & Wales (0.11%). Just under a fifth (18%) of Gypsy and Traveller households living in North Norfolk were recorded as residing in a caravan or other mobile home, whilst just over four fifths (82%) were recorded as residing in bricks and mortar accommodation.
- 3.17 No caravans were recorded in North Norfolk by the January 2024 Caravan Count although an average of four caravans were recorded on authorised pitches between July 2021 and July 2022.

¹⁹ See ONS 2021 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

- 3.18 Over the 5-year period Q1 (April to June 2019/20) to Q4 (January to March) 2023/24 there were a total of 20 unauthorised encampments in the district with an average of 1 per quarter. On average, the number of unauthorised encampments recorded in North Norfolk declined between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24. On average, 2 caravans were recorded on each unauthorised encampment.
- 3.19 There are a total of 14 authorised pitches in the district and 2 on unauthorised developments. There are no local authority-owned permanent sites, but there are 2 local authority owned and managed transit sites consisting of 20 pitches. The number of caravans using the transit sites declined between 2017 and 2023. However, Covid-19 restrictions may have impacted on usage of the transit sites during 2020 and 2021, and both transit sites are in poor condition meaning that Gypsy and Traveller households may have been discouraged from using them.

4. Stakeholder consultation

Introduction

- 4.1 Consultations with a range of stakeholders were conducted to provide qualitative information about the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The aim of the consultation was to obtain both an overall perspective on issues facing these groups and an understanding of local issues that are specific to the study area.
- 4.2 In recognition that Gypsy and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers and agencies from within neighbouring authorities, as well as from within the study area.
- 4.3 Themes included: existing provisions; main issues facing the different community groups in relation to accommodation, drivers for new accommodation; the need for additional provisions and facilities; travelling patterns; unauthorised encampments; planning process; communication between service providers; access and use of services (such as health and education); the availability of land; barriers to new provision; accessing services; and work taking place to meet the needs of the different community groups. This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised.

Accommodation needs

Gypsies and Travellers

- 4.4 It was generally agreed that there is a lack of accommodation provision across the study area and surrounding authorities. It was commented that there are not enough permanent pitches for Gypsies and Travellers or plots for Showpeople. Stakeholders commented on how a lack of provision has led to overcrowded pitches and plots, unauthorised encampments and developments, or households having to reside in brick-and-mortar accommodation. It was suggested that some households residing in bricks and mortar accommodation are struggling and would prefer to reside in trailers.
- 4.5 Stakeholders emphasised that small family sites and yards were the most favoured form of provision and tended to be of a higher standard compared to larger sites. It was generally acknowledged that there is a lack of accommodation provision throughout the county. This is in terms of both permanent and transit provisions. It was suggested that some Gypsy and Traveller families often 'get by' by travelling on the road, using transit sites, and residing in bricks-and-mortar accommodation.

- 4.6 Stakeholders acknowledged that there are transit sites across the county, including two within North Norfolk. However, they expressed concerns about the condition of all transit provision. The two in North Norfolk, for example do not have any electric provision, minimum water and toilet provision (if any at times) and were dusty gravel and not always easy to access (being locked and households not knowing how to access. Others spoke of how families do not like to use the sites, not only due to the condition, but also due to location (in particular the one in Cromer (between local authority office and police station)) and households not wanting to mix with other households on enclosed sites.
- 4.7 Stakeholders are increasingly advocating for "negotiated stopping places" over new transit sites, a model allowing temporary, agreed-upon caravan placements with basic services. This approach, fostering agreements between authorities and temporary residents about mutual expectations, is seen as a positive way forward.

Travelling Showpeople

- 4.8 The Showmen's Guild confirmed that there are no known accommodation yards in the study area. Travelling Showpeople families operate events and funfairs in the study area, including some along the seafront. As such, some storage yards in the study area are used by Travelling Showpeople. However, these are not used for accommodation, and the Travelling Showpeople households reside in houses.
- 4.9 A representative from the Showmen's Guild stated that they have expressed concern for many years about a lack of Showpeople provision in local areas. Consequently, yards in neighbouring authorities are full, and families are struggling to find new places. Showpeople were regarded by stakeholders as travelling for work rather than cultural needs, leisure or pleasure, and tended to only stop at pre-arranged fair or circus venues. In contrast, Gypsies, Travellers were regarded by stakeholders as being communities for whom travelling is an important element of their identity.

Barriers to Accommodation Provision

- 4.10 Key barriers to new accommodation provision noted by stakeholders included public and political opposition to new sites; a lack of suitable land; the high cost of suitable land; lack of interest from landowners to developing new sites; different local authorities applying different planning guidance in relation to the development of new sites.
- 4.11 Stakeholders commented on how local authority 'calls for sites' rarely lead to potential sites being put forward by the private sector. Also, it can be difficult to gain public acceptance of proposals for new sites or yards. Landowners may be reluctant to offer land for development as new sites or yards if alternative uses are regarded as more

profitable. Stakeholders suggested that allocating land for the development of new sites or yards assures the Gypsy, Traveller and Showpeople communities that accommodation needs would be met.

- 4.12 It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Land suitable for the development of new sites and yards tends to be too expensive for local Gypsy and Traveller households and is more likely to be used for the development of residential properties. This often leaves small parcels of land for the development of new sites, which are not always in locations suitable for the development of new sites. Also, land in more rural locations is more likely to be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites, although larger sites can be difficult to manage and lead to conflict between families.
- 4.13 Difficulty in identifying suitable land and affordability were cited as key barriers to the provision of new sites and yards. It was suggested that there is too few permanent sites or yards is mainly due to a lack of suitable land and limited funding for the development and maintenance of new provision. The process of identifying suitable land was also deemed problematic.
- 4.14 It was suggested that local authorities should ensure that Local Plans make it clear how the requirement for new pitches will be met. Also, they should work closely with the development industry, Registered Providers, and landowners to explore opportunities for new sites. It was also suggested that all new local developments should include provisions for these communities. Some local authorities may have land suitable for development.
- 4.15 Applicants sometimes sought planning permission for the minimum number of pitches or plots with the intention of seeking permission for further pitches or plots at a later date. This is not problematic if the site or yard is large enough to cope with expansion. It was noted that some planning permissions for new provisions within the study area were initially refused but later granted on appeal. Gaining planning permission for a new sites or yards was regarded by stakeholders as a significant hurdle.
- 4.16 A key barrier to new provision mentioned by stakeholders is discriminatory attitudes towards the travelling communities. In response, it was suggested that it is important to determine policy responses in order to manage conflict that may arise from the development of new provision. This will require planning departments to work in liaison with other local authority departments and agencies.

- 4.17 Stakeholders mentioned a lack of respect and understanding between travelling communities and the settled community, noting that negative social media can worsen tensions. Problems are often more noticeable when land used for unauthorised camps is left in bad condition. However, there seems to be less awareness of issues between permanent site residents and the settled community. Furthermore, stakeholders observed that media coverage, both national and local, of the Gypsy and Traveller communities is mostly negative. This coverage shapes public perceptions, particularly concerning unauthorised encampments, and negatively influences both the public and elected officials' attitudes towards approving new sites.

Health and Education

- 4.18 Stakeholders suggested that, compared to the general population, the health status of Gypsies and Travellers is significantly poorer. A key factor contributing to this includes poor access to healthcare services, particularly for households without permanent accommodation. The living conditions of Gypsies and Travellers, including insecure housing, can have a significant impact on their physical and mental health. It can be difficult for Gypsies and Travellers to register for healthcare services.
- 4.19 Compared with previous generations, Gypsy and Traveller children may be more likely to attend education. However, there can still be difficulties with Gypsy and Traveller children enrolling in schools, Gypsy and Traveller children can face bullying and discrimination in school from their peers, and sometimes, from school staff and schools often lack understanding of Gypsies and Travellers way of life, in particularly when it comes to travel patterns which often result in them needing time away from school.

Communication

- 4.20 It was suggested that there needs to be better cooperation between local authorities in relation to issues concerning Gypsies, Travellers, and Travelling Showpeople. Local authorities tend to react to traveller issues, e.g. in relation to unauthorised encampments and planning applications. There is insufficient cooperation to resolve issues around unauthorised encampments or to improve relations with the travelling community. Financial constraints mean that local authorities are not always able to take a proactive response to issues regarding the travelling communities. For example, suitable land is usually prioritised for residential development, as this yields a greater capital return compared to providing traveller sites.
- 4.21 There is a need for improvement, particularly when assessing needs and understanding the requirements and travelling patterns of the travelling communities at the county or subregional levels. There is a need to work in a joined-up way across the whole of Norfolk and agree on sites for long- and short-term stays, as well as a policy on tolerated sites.

Summary

- 4.22 The stakeholder consultation offered important insights into the main issues faced by the travelling community within the county. It was generally acknowledged that there is a perceived lack of both permanent and transit accommodation provision. Also, some existing sites are in need of investment and upgrading to meet current standards. Social rented pitches, particularly those on larger sites, are not desirable to all households due to poor conditions and a preference to own pitches rather than pay rent. It was suggested that the main drivers of accommodation needs are younger people requiring future separate accommodation, households setting up unauthorised developments due to difficulties in the planning process and needs arising from households residing in bricks-and-mortar accommodation wanting a pitch.
- 4.23 Key barriers to new accommodation provision noted by stakeholders included a lack of suitable or affordable land, competing interests for suitable land, a lack of finance, and the complexity of planning processes. It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Also, land in more rural locations is more likely to be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites, although larger sites can be difficult to manage and lead to conflict between families.
- 4.24 Compared to the general population, the health status of Gypsies and Travellers is significantly poorer. A key factor contributing to this includes poor access to healthcare services, particularly for households without permanent accommodation. Compared with previous generations, Gypsy and Traveller children may be more likely to attend education. However, there can still be difficulties with Gypsy and Traveller children enrolling in schools, Gypsy and Traveller children can face bullying and discrimination in school from their peers, and sometimes, from school staff and schools often lack understanding of Gypsies and Travellers way of life, in particularly when it comes to travel patterns which often result in them needing time away from school.

5. Gypsies and Travellers consultation

Introduction

- 5.1 This section of the assessment focuses on the consultation with Gypsies and Travellers. It involved questions covering a range of issues related to accommodation and service needs based on a standard questionnaire. Whilst covering all questions, the method and order of questions varied in order to maximise response rates. Methods ranged from an informal style to a more formal approach, which involved asking questions in a specific order.

Methodology

- 5.2 The consultation included questions regarding issues such as family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and/or undeveloped pitches, and future plans for pitches), travelling patterns, and accommodation needs.
- 5.3 The consultation achieved a 93% response rate from households. Through direct and indirect consultations, sufficient data was gathered to represent all known, occupied, authorised and unauthorised pitches. Consultation took place with households on 13 of the 14 authorised pitches, as well as with two unauthorised developments. Additionally, three households on transit sites were consulted, none of whom required permanent accommodation within North Norfolk but needed temporary transit accommodation.
- 5.4 The data was used to calculate the level of supply, occupancy and need and which of the two needs categories those with need met. Also, general comments in terms of the key issues were gathered and recorded in order to gain and present further insight and evidence for the needed calculations (summarised below).
- 5.5 The number and location of pitches were determined using local authority data and site visits. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits, and consultation with households helped to clarify the status of pitches (i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, pitches with planning permission which are planned to be developed or redeveloped, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues). Locations where planning permission has lapsed, refused, or withdrawn, or where enforcement action has previously taken place, were also visited to confirm occupancy and use.

- 5.6 Although attempts were made to access Gypsies and Traveller households residing in bricks and mortar accommodation, it was not possible to consult with them. However, an alternative method of determining the accommodation needs of households residing in bricks-and-mortar accommodation has been applied (see step 15 below).

Existing Supply

- 5.7 There are 14 authorised pitches in the study area. Table 5.1 shows the occupied pitches, vacant pitches (current pitches with planning permission but not occupied at the time of the consultation), and potential pitches (pitches with planning permission expected to be developed or redeveloped and occupied within the first five-year period).

Table 5.1 Occupied, vacant and potential Gypsy and Traveller pitches.

Occupied	Vacant	Potential	Total
14	0	0	14

Source: Study area local authority 2024

- 5.8 Table 5.2 below lists the number of authorised pitches per authority, including vacant and potential pitches.

Table 5.2 Permanent Gypsy and Traveller pitches per authority

Private	LA	Total
14	0	14

Source: GTAA 2024

- 5.9 Table 5.3 lists the number of pitches per authority with temporary planning permission and those with no planning permission and recorded as unauthorised developments (including unauthorised pitches tolerated by the respective planning authority and those with pending applications or appeals). As can be seen in the needs calculations below (Table 5.3) these pitches contribute towards the additional accommodation needs in the area, due to being in need of permanent planning permission and the occupants having accommodation need.

Table 5.3 Gypsy and Traveller pitches without permanent permission

Temporary	Unauthorised developments	Total
0	2	2

Source: GTAA 2024

Permanent accommodation need

- 5.10 Additional accommodation needs mainly derive from households residing on unauthorised pitches or pitches with temporary planning permission requiring permanent permission; households residing on overcrowded authorised pitches; and new family formations expected to arise from within existing family units. Accommodation needs for pitches also derives from households residing in bricks and mortar accommodation. Households residing on sites and stakeholders commented on how it is important to determine this component of accommodation needs.

Requirement for permanent residential pitches for the first five years

- 5.11 The need for residential pitches in the study area is assessed according to a 15-step process based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.4 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. The following table (Table 5.4) relates to the study area as a whole.
- 5.12 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column), and second, based on PPTS 2023 ('PPTS' column).

Table 5.4 Estimate of the need for permanent residential pitches for period 2024-2029

	Ethnic	PPTS
1) Current occupied permanent residential site pitches	14	14
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0
4) Net number of household units on sites expected to leave the area	0	0
5) Number of family units on sites expected to move into housing	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0
Total Additional Supply	0	0
7) Seeking permanent permission from temporary sites	0	0
8) Family units (on pitches) seeking residential pitches in the area	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0
11) Family units on unauthorised developments requiring residential pitches	2	2
12) Family units currently overcrowded (hidden family members or doubling up)	0	0
13) Net new family units expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing family units	3	3
15) Family units in housing with a need for a pitch	2	0
Total Need	7	5
Total Additional Pitch Requirement	7	5

Source: GTAA 2024

Requirement for permanent residential pitches for 2024-2029: steps of the calculation

5.13 Information from the local authority and the census plus evidence from the survey was used to inform the calculations, including:

- The number of Gypsies and Travellers housed in bricks and mortar a
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches

5.14 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations.

Supply of pitches

Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation needs to be used.

Step 1: Current occupied permanent site pitches

- 5.15 Based on the information provided by the councils and corroborated by site visits and household surveys, there are currently 14 occupied authorised Gypsy and Traveller pitches in the study area.

Step 2: Number of unused residential pitches available

- 5.16 This relates to those pitches that have planning permission and are developed but not currently in use. There are currently 0 vacant pitches within the study area.

Step 3: Number of existing pitches expected to become vacant

- 5.17 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities, suggesting a life expectancy approximately ten years lower than that of the general population.²⁰ This results in the supply of 0 pitches.

Step 4: Number of family units in site accommodation expressing a desire to leave the study area and resulting in the creation of a vacant pitch

- 5.18 Two households surveyed as part of the GTAA stated that they intend to leave the study area in the next five years. As there is no data regarding households who would like to in-migrate from outside the study area, both in- and out-migration are determined as 0.

Step 5: Number of family units on permanent pitch site accommodation expressing a desire to reside in housing and resulting in the creation of a vacant pitch

- 5.19 This is determined by survey data. It was assumed that all those currently residing on sites planning to move into housing in the next five years (step 5) or preferring to move into housing from an overcrowded pitch (step 11) would be able to do so. This resulted in a supply of 0.

Step 6: Residential pitches planned to be built or brought back into use

- 5.20 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches

²⁰ E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987.

include those that have been partly developed or that were previously occupied but are currently not occupied and in need of redevelopment. There are zero pitches in the study area that are expected to be built or brought back into use during the period 2024-2029.

Need for pitches

- 5.21 As discussed in Chapter 2, this needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column), and second, based on PPTS 2023 ('PPTS' column).

Step 7: Seeking permanent permission from temporary sites

- 5.22 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2024-2029 will still require accommodation within the study area. There are currently 0 pitches with temporary planning permission located in the study area. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

Step 8: Family units on pitches seeking residential pitches in the study area and not leading to making a pitch vacant and available for others to occupy

- 5.23 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years and wanted to stay on an authorised site or that they were currently seeking accommodation.
- 5.24 This category of accommodation needs overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

Step 9: Family units on transit pitches seeking residential pitches in the study area

- 5.25 This is determined by survey data. Three households were consulted of which none reported that they required permanent pitches within the study area in the next five years. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

Step 10: Family units on unauthorised encampments seeking residential pitches in the study area

- 5.26 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area

have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 0 households surveyed on unauthorised encampments within the study area during the survey period.

Step 11: Family units on unauthorised developments seeking residential pitches in the area

- 5.27 This was determined by consultation data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. This generates a total need in the study area of 2 pitches ('ethnic'), and 2 pitches ('PPTS').

Step 12: Family units on overcrowded pitches seeking residential pitches in the area and not leading to making a pitch vacant and available for others to occupy

- 5.28 This was determined by the consultation. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 14) their accommodation will no longer be overcrowded. The calculations suggest that the need for additional pitches in the study area to resolve overcrowding over the period 2024-2029 are as follows: 0 pitches ('ethnic definition'), and 0 pitches ('PPTS' definition).

Step 13: New family units expected to arrive from elsewhere

- 5.29 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. This amounts to a net inflow of 0 households into the study area.

Step 14: New family formations expected to arise from within existing family units on sites

- 5.30 The number of individuals needing to leave pitches to create new family units within the period 2024-2029 was estimated from consultation and excludes those included in steps 8, 12 and 13. This will result in the formation of 3 new households requiring residential pitches over the period 2024-2029 ('ethnic definition'), and 3 pitches ('PPTS' definition).

Step 15: Family units in housing with need for a pitch

- 5.31 This was determined firstly by the number of Gypsy and Traveller households residing in bricks and mortar accommodation was determined using 2021 Census

data which records how many Gypsies and Travellers living in the district and by type of accommodation. The number of those living in a caravan (as recorded by the census) was removed from the total to give the number living in bricks and mortar. Based on 2021 Census data, there is an estimated 23 households residing in bricks and mortar accommodation in the study area. Applying a 10% ratio in relation to psychological aversion results in a need for 2 pitches.

- 5.32 As the travelling status of households residing in bricks and mortar accommodation is not known, the accommodation needs arising from these households are only included in the 'ethnic' needs figures. This results in a need for 2 additional pitches in relation to the 'ethnic' definition and 0 pitches in relation to the PPTS definition.

Balance of Need and Supply

- 5.33 From the above, the Total Additional Pitch Requirement is calculated by deducting the supply from the need.

Table 5.5: Summary of Gypsy and Traveller pitch needs for the period 2024-2029

	Ethnic	PPTS
Supply	0	0
Need	7	5
Difference	7	5

Source: GTAA 2024

Requirement for permanent residential pitches from 2029-2040

- 5.34 Considering future accommodation needs, it is assumed that those families with needs stemming from those residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.5 below. Please note that the 2024 base figures include both authorised occupied and vacant pitches, whilst the 2029 base figures assume that any potential pitches have already been developed.

- 5.35 2029 pitch base figures are determined by several factors, including:
- the number of occupied pitches in 2024 (as determined by the household survey)
 - the number of vacant pitches in 2024 (as determined by the household survey)
 - the number of potential pitches (as determined by local authority data)

- accommodation need for the first five-year period (as determined by the GTAA)

- 5.36 It is assumed that by the end of the first five years vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply.
- 5.37 In relation to this accommodation assessment, analysis of the current population indicates an annual household growth rate of 2.35% per annum (compound), equating to a 5-year rate of 12.3%. This is based on an analysis of various factors derived from the surveys, including current population numbers, the average number of children per household, and marriage rates. A mortality rate of 2.825% applied over the 5-year period leads to a net population growth rate of 9.475% rounded to 9.5%.
- 5.38 Tables 5.6 shows the accommodation needs for the study area for the periods 2029-2034 and 2034-2040

Table 5.6: Summary of accommodation needs 2024-40 (pitches)

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

Requirements for transit pitches / negotiated stopping arrangements.

- 5.39 Whilst acknowledging the existing Transit provision (sites) within the authority this report recommends that the local authority set up a corporate approach around negotiated stopping places policy (see Appendix 1 for an example of a negotiated stopping place protocol). This involves households residing in caravans being able to stop at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that the local authority adopts the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or on a countywide basis.
- 5.40 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land, providing the encampment does not cause any danger, problems or nuisance to its occupants or the local community. The arrangement is between the local authority, police, and the transient households (and the landowner if situated on privately owned land).

- 5.41 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved to an alternative location that is more suitable. It is important for the local authority to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities.
- 5.42 The characteristics of negotiated stopping places mean that there is no inherent cost of purchasing land or the requirement for the local authority to gain planning permission. It is simply an agreement for transiting households to use appropriate land for an agreed period and provision of, e.g. wheelie bins or skips, and if possible, Portaloo's and porta showers.
- 5.43 Also, the local authority should consider allowing visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time. This will allow households to temporarily accommodate family and friends without fearing that their licence will be at risk due to having too many caravans on site.

Summary

- 5.44 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. It has determined accommodation needs resulting from the calculations in the tables above for the study area as a whole:

Table 5.7: Gypsy and Traveller permanent accommodation need (summary)

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

6. Conclusion and Recommendations

Introduction

- 6.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new provisions, facilities, and recording and monitoring processes.
- 6.2 The chapter begins by presenting a summary of the accommodation needs, followed by a review of the accommodation needs and facilitating the additional accommodation needs. As previously discussed, this report focuses on the assessment of accommodation needs for Gypsies and Travellers. It acknowledges that, whilst there is currently no occupied supply or identified need for Travelling Showpeople, there is still a need to consider them in addressing transit need and any need that might materialise during the local plan period.
- 6.3 The accommodation needs calculations undertaken as part of this GTAA were based on analysis of both secondary data, site visits and consultation with Gypsies and Travellers.

Permanent accommodation needs

- 6.4 Table 6.1 outlines the permanent accommodation need for Gypsy and Traveller pitches over the period of 2024 to 2040:

Table 6.1: Gypsy and Traveller permanent accommodation needs

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

Transit provision

- 6.5 Whilst acknowledging the existing Transit provision (sites) within the authority this report recommends that the local authority set up a negotiated stopping places policy. This is land temporarily used as authorised short-term (less than 28 days) stopping places. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the agreed location for a few days. Amenities such as Portaloo's and showers (or access to alternative nearby facilities) and skips or wheelie bins should ideally be made available for the duration of the agreed period.

- 6.6 According to research undertaken on behalf of the Greater London Authority (GLA) (2019), negotiated stopping is a balanced and humane approach to managing roadside camps. It is based on a mutual agreement between the local authority and Gypsy and Traveller families on matters such as waste disposal and basic temporary facilities. This can sometimes involve directing Gypsy and Traveller households away from contentious public spaces to more appropriate council land. The approach has been proven to achieve significant savings in public spending and decrease social costs for Gypsy and Traveller communities.
- 6.7 The GLA (2019) report cites a number of examples of good practice, including those of Hackney. The local authority has worked closely with the Gypsy and Traveller communities and involved them in dialogue and negotiation. This has resulted in a consistent practice over many years of allowing stopping time and making provision of basic facilities. There have been many locations in the borough that were common stopping places; some were used for short periods of time for families passing through or visiting relatives, and others were used for months and even a couple of years. The practice was also formalised to an extent through leniency agreements, which specified arrangements between the local authority and the Traveller families. This is also incorporated into the council's unauthorised encampment protocol.
- 6.8 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. It was first developed by Leeds Gypsy and Traveller Exchange (GATE) and involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to more suitable land (please see Appendix for an example of negotiated stopping place protocol).
- 6.9 Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land, providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, and the transient households (and the landowner if situated on privately owned land).
- 6.10 The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but may include Travellers agreeing to leave sites clean and not make too much noise with the local authority providing waste disposal and toilets, sometimes showers and water too. However, as Leeds GATE states, negotiated stopping is a locally agreed solution, so it may differ in different locations. For Negotiated Stopping to work, the local authority must negotiate with roadside Travellers. It will involve talking to and consulting roadside Travellers and working out solutions.

- 6.11 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for the local authority to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, the local authority should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.
- 6.12 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community and allow households with stopover requirement to stay for an agreed period.

Summary

- 6.13 The results from this assessment supersede any previous GTAA (including any accommodation need calculated prior to this assessment) for the local planning authorities. This assessment identifies that there is an overall accommodation need in the study area for the local plan period for 11 additional pitches (ethnic definition), and 9 pitches (PPTS 2023). There is no identified additional accommodation need for Travelling Showpeople.
- 6.14 It is recommended that the authority incorporates a policy to address negotiated stopping places for transient and / or visiting Gypsy and Traveller encampments and make this available to Gypsies and Travellers and Travelling Showpeople. It is recommended that the authority incorporates this as part of their local plan as addressing the transit need. There is also the option of reestablishing the existing transit provision, in conjunction with the negotiated stopping policy.
- 6.15 Looking at the distances involved across the study area, anywhere within the Local Plan area would be acceptable in terms of locating new permanent sites and yards to meet the identified need.
- 6.16 This GTAA recommends that North Norfolk in their local plan adopt the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed. Since the Lisa Smith case (2022) there is greater emphasis on Gypsies and Travellers ethnic identity than their travelling patterns (past or present).

- 6.17 Alternatively, the local authority may adopt the 'PPTS 2023 definition accommodation needs figures with the difference between the PPTS 2023 figures and 'Ethnic' definition being an additional need that the council(s) may choose to meet. This means that the local authority would first meet the need of 9 (5 within the first 5 years) as the obligation but accept the need of a further 2 (2 within the first 5 years) as potential need if further applications are brought forward through windfalls.
- 6.18 In addition to the identified need there may also be an additional element of unidentified need from households residing on unauthorised developments, unauthorised encampments, new households due to in-migration, and those residing in bricks and mortar accommodation who have not identified themselves as ethnic. It is recommended that a flexible policy criteria approach such as in the submitted Plan policy HOU5 is sufficient.
- 6.19 There are currently two pending applications – one for 3 pitches and another for 2 pitches. These will address 4 identified needs for the first five years and 1 for the second five-year period. Additionally, there is a site with the potential to intensify by 1 pitch. As a result, the need for pitches under the PPTS definition for the first five years will be fully met, leaving 2 pitches outstanding under the 'ethnic' category. These remaining needs can be best addressed through windfall applications, in accordance with the submitted policy approach HOU5 resulting in a revised assessment of need as follows:

Table 6.2: Indicative future Gypsy and Traveller permanent accommodation needs (assuming approval of the two pending applications)

Period	Ethnic definition	PPTS 2023 definition
2024-2029	1	0
2029-2034	2	1
2034-2040	2	2
Total	5	3

Source: GTAA 2024

- 6.20 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:
- In relation to the different community groups, it is recommended that the local authority work closely with the families to determine how their accommodation need can best be met.
 - Also, for the local authority to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
 - It is recommended that the local authority reviews the planning of unauthorised developments and consider granting permanent status.

6.21 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

- How the accommodation needs can be met through expansion of existing sites and new sites /yards
- The delivery mechanisms such as being open to the development of sites on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the different community groups..
- Prior to action being taken against sites or yards being used without planning permission, the local authority, in partnership with landowners, occupants and relevant agencies (e.g. National Federation of Gypsy Liaison Groups and Showmen's Guild (local and national)), to review its current, historic and potential planning status, and review the most effective way forward.
- Implement a corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites to determine how they could expand the number of pitches to meet the family's accommodation needs when arise .
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change rapidly. As such, in line with Plan review requirements it is recommended that their accommodation needs should be reviewed every 5 to 7 years.
- Housing organisations need to consider allocating culturally appropriate housing to Gypsies and Travellers residing in bricks and mortar, for example, with sufficient space to accommodate a caravan.
- Develop a holistic vision for their work with the different community groups, and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, and Showpeople communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies in relation to Gypsy, Traveller and Showpeople communities.

- The population size and demographics of the Gypsy, Traveller and Showpeople communities can change. As such, their accommodation needs should be reviewed every 5 to 7 years.

Appendix 1: Example negotiated stopping place protocol

This agreement is between [Local Authority] and [named head of family]

This agreement relates to the time limited toleration of your encampment on [Local Authority] owned land adjacent to xxxx. The land is shown on the appending map.

The Council is currently willing to tolerate your encampment on the site for a short period of time until xxxx. The Council recognises its legal obligations to carry out needs assessment prior to initiating legal action to recover possession of land.

[Local Authority] reserves the right to terminate this agreement, and to seek to recover possession of the land through court proceedings, at an earlier date if the terms set out below in this agreement are breached.

I, and my family agree to adhere to the following terms:

1. You will be asked to park your caravan and vehicles in a designated place on the site. This is to prevent further caravans joining the encampment. Your family must stay within the boundaries of the site.
2. You will be issued with a toilet. This is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
3. You will be issued with a bin for all your domestic waste. You are responsible for keeping the area around your caravan clean and tidy. The bin is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
4. All dogs must be kept under control and tied up. Dogs must be tied up on a lead or in a kennel during the night or when you leave the site for any period of time. The dog wardens will visit this site if loose dogs are reported.
5. No fires larger than a small cooking fire are to be lit, absolutely no burning of commercial or domestic waste is allowed.
6. The nearest Household Waste for larger items is at Trade waste can be disposed at
7. Environmental enforcement officers will monitor the site and take action against any activity likely to cause environmental harm, inconvenience or distress to surrounding occupants such as fly-tipping, excessive noise or use of quad bikes.
8. Give consideration to other people within the local vicinity in terms of noise nuisance and the parking of vehicles.
9. Not to engage in any anti-social behaviour, disorder or fly tipping on or near this site. Horses will not be tolerated on the site and the presence of horses may be regarded as 'anti social behaviour' for the purposes of this agreement. Any traps owned by families are not to be used in or around the immediate area.

10. This agreement has been negotiated between [Local Authority] and Gypsy/Traveller people in the [local] area. You are encouraged to cooperate with the Local Authority to make the agreement work by discussing any incidents, concerns or suggestions that may affect the agreement with local authority officers when they visit weekly. You can also telephone the council [phone number], [police liaison officer] or speak to staff at [Third party advocacy where available] if you want them to raise issues on your behalf.

I understand the above points which have been explained to me, and I agree.

Signed.....date.....

Signed.....date.....(local authority)

Bibliography

Brown, Philip, *Advice for Babergh District Council on household formation relating to Gypsy and Traveller pitches*, Sustainable Housing & Urban Studies Unit (SHUSU), University of Salford, October 2015.

Canal & River Trust, *Planning for waterways in Neighbourhood Plans – what your local waterway can do for your community*, 2017.

Cemlyn, Sarah, Greenfields, Margaret, Burnett, Sally, Matthews, Zoe and Whitwell, Chris (2009) *Inequalities Experienced by Gypsy and Traveller Communities: A Review*, Equality and Human Rights Commission, London.

Commission for Racial Equality, *Common Ground Equality, good race relations and sites for Gypsies and Irish Travellers* - Report of a CRE inquiry in England and Wales, (Summary), May 2006.

Court of Appeal, Smith vs Secretary of State for Levelling Up, Housing and Communities, Case no. CA-2021-001741, 31 October 2022.

Cullen, Sue, Hayes, Paul and Hughes, Liz (2008), *Good practice guide: working with housed Gypsies and Travellers*, Shelter, London.

DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007.

DCLG, *Gypsy and Traveller Accommodation Needs Assessments*, October 2007.

DCLG, 'Planning Policy for Traveller Sites', August 2015.

DCLG, *Draft Guidance to local housing authorities on the periodical review of housing needs (Caravans and Houseboats)* March 2016.

Department of Levelling Up, Housing and Communities (DLUHC), January 2024 Traveller Caravan Count, July 2024.

House of Commons Library, *Gypsies and Travellers: Planning Provisions*, Briefing Paper 07005, 4 January 2016.

Liegeois, J. P. (1994) *Romas, Gypsies and Travellers*, Strasbourg: Council of Europe.

National Planning Policy Framework, December 2023.

Niner, Pat (2003), *Local Authority Gypsy/Traveller Sites in England*, ODPM.

Niner, PM (2004) 'Accommodating Nomadism? An Examination of Accommodation Options for Gypsies and Travellers in England', *Housing Studies*, Carfax Publishing.

Niner, Pat, Counting Gypsies & Travellers: *A Review of the Gypsy Caravan Count System*, ODPM, February 2004 located at <http://www.communities.gov.uk/documents/housing/pdf/158004.pdf>

North Norfolk Local Plan 2016-2036, January 2022.

ONS 2021 *Census Table KS201EW Ethnic Group* located at: <http://www.ons.gov.uk/>

Ryder, A, Acton, T, Cemlyn, S, Cleemput, P, Greenfields, M, Richardson, J and Smith, D. (2011) *A Big or Divided Society? Final Recommendations and Report of the Panel Review into the Impact of the Localism Bill and Coalition Government Policy on Gypsies and Travellers*. London: Travellers Aid Trust.

Glossary

Amenity block

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

Authorised site

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

Average

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

Bargee Travellers and boat dwellers

As defined by the National Bargee Travellers Association (NBTA):

"Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932".

The NBTA also distinguish between 'Bargee Travellers' and 'boat dwellers'. 'Bargee Travellers' are people whose main or only home is a boat without year-round access to a permanent mooring. 'Boat dwellers' are considered by the NBTA to be people whose main or only home is a boat and who have year-round access to a permanent mooring, whether or not that mooring has planning consent for residential use.

Bedroom standard

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers residing on sites to take into account that caravans or mobile homes may contain both bedroom and residing spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

Bricks and mortar accommodation

Permanent housing of the settled community, as distinguished from sites.

Caravan

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

Concealed household

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

Doubling up

More than one family unit sharing a single pitch.

Emergency stopping places

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

Family Owner Occupied Gypsy Site

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

Family unit

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

Gypsy

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

Gypsy and Traveller

The DLUHC's December 2023 definition of Gypsies and Travellers²¹, is set out below:

For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

Hidden Household

A household not officially registered as occupying a site/yard or pitch/plot who may or may not require separate accommodation.

Household

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

Irish Traveller

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

Local Authority Sites

The majority of local authority sites are designed for permanent residential use.

Local Development Documents (LDD)

These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory

²¹ See: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>.

development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

Negotiated Stopping

The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

Net need

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

New Traveller (formerly 'New Age Traveller')

Member of the settled community who has chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

Newly forming families

Families residing as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

Overcrowding

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

Permanent residential site

A site intended for long-stay use by residents. It has no maximum length of stay but often constraints on travelling away from the site.

Pitch

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

Primary data

Information that is collected from a bespoke data collection exercise (e.g., surveys, focus groups or interviews) and analysed to produce a new set of findings.

Private rented pitches

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

Psychological aversion

Whilst not a medical condition this is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.

Secondary data

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

Settled community

Used to refer to non-Gypsies and Travellers who live in housing.

Site

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

Socially rented site

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offered at below private market levels.

Tolerated

An unauthorised development or encampment may be tolerated by the local authority meaning that no enforcement action is currently, or likely to be, being taken.

Transit site/pitch

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

Travelling Showpeople

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

Travelling Showpeople Plot

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

Travelling Showpeople Yard

An area of land laid out and/or used for Travelling Showpeople for residential occupation, which can be authorised (have planning permission) or unauthorised. Yards can be self-owned by a Travelling Showpeople resident or rented from a private or social landlord. Some yards are leased or rented from the Showmen's Guild. They can vary in type and size although they need to consider the need for residents to store and maintain fairground equipment.

Unauthorised development

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

Unauthorised encampment

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

Unauthorised site

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.

Appendix 7

Consultation Arrangements & Communications Plan: Further Regulation 19 Consultation (Main Soundness Issues)

General Arrangements

It is proposed that the consultation period shall last for six weeks. Officers are currently working to a commencement date of **Wednesday 6 November** and a closing date of **Wednesday 18 December 2024**.

The consultation will:

- Be open and accessible to all, with advice and support available.
- Be promoted by tried and tested means, as detailed in Table 2, below.
- Include a number of supporting evidence documents which will be available at www.north-norfolk.gov.uk/localplanconsultation
- (responses) will be submitted through the online Consultation Portal as the primary method of response.

A number of hard copy documents of the consultation document and supporting documents will also be produced. Those wishing to make paper-based representations will be enabled to do so via alternative methods.

Table 1 - Document Availability

Document	Details
Consultation Documents	Copies of the consultation document and supporting documents will be printed and made available at advertised consultation points (Council offices, local libraries).
Comments Form	Those wishing to make comments will be directed to the online response method. Copies of paper response forms will be available on request and can be submitted via email or post.

Promotion

Following anticipated endorsement by Cabinet on Monday 4th November, the consultation will immediately be promoted by officers and the Council's Communication Team through a variety of methods including Statutory notices, news releases, social media, the use of direct letters to interested parties, and a member's briefing. The details are outlined in the following table:

Table 2 - Promotional Options

Task	Involving	Proposed implementation
Event	Members Briefing - All Members offered the opportunity of a briefing to explain the latest stage of	<ul style="list-style-type: none">• W/c 4 November TBC

	the examination and the consultation arrangements for addressing main soundness issues.(Teams)	
Targeted Communication	<p>Targeted letters / statutory notice - advising of the consultation details and how to respond will be sent to:</p> <ul style="list-style-type: none"> • Draft Local Plan Representors A notification to all those who made a Regulation 19 stage representation on the Submission Version Local Plan (i.e. those persons with vested/proven interests). • Examination participants Where different from above, a notification to all those who submitted evidence and attend the examination hearing sessions in January to March 2024. • Town & Parish Councils To aid dissemination across the district, an update will be provided on the Local Plan examination process, including details of this consultation (a separate approach may be used for parishes where changes are proposed within the consultation document). 	<ul style="list-style-type: none"> • W/c 4 November
News Release	<p>Available to all, frequently monitored by mainstream external media organisations.</p> <p>It is proposed to issue a news release during the week of the consultation (immediately following Cabinet endorsement), and, given the run up to the festive period, a further 'reminder' news release issued a week prior to close of the consultation.</p>	<ul style="list-style-type: none"> • W/c 4 November • 1 week prior to close of consultation
Consultation Notice	Distributed via targeted letters to Parish & Town Council's + Members for optional placement in the locality on parish notice boards or distribution at parish meetings.	<ul style="list-style-type: none"> • W/c 4 November
Social Media Facebook, Instagram, Linked In, Next Door, TikTok, X	As a minimum, social media messages will be drafted by the Communication Team and issued via appropriate channels and in alignment with the news releases detailed above.	<ul style="list-style-type: none"> • W/c 4 November • 1 week prior to close of consultation • At discretion of Comms Team
Other information outlets to be utilised	<ul style="list-style-type: none"> • Libraries • Intranet • Members Bulletin (invitation to briefing) • NNDC Local Plan Web Page • NNDC News Page • NNDC 'Council Consultations' web page 	Throughout consultation

North Norfolk District Council

Settlement Boundary Review: Small Growth Villages Background Paper (Addendum)

Contains details of North Norfolk Council's methodological approach to the identification of settlement boundaries in a number of additional proposed Small Growth Villages.

**Planning Policy & Built Heritage Working Party:
Appendix 5 - Draft Settlement Boundary Review**

October 2024

**North Norfolk District Council
Planning Policy Team**

01263 516318

planningpolicy@north-norfolk.gov.uk

Planning Policy, North Norfolk District Council,
Holt Road, Cromer, NR27 9EN

www.north-norfolk.gov.uk/localplan

**All documents can be made available in
Braille, audio, large print or in other languages.**



Contents

1	Introduction	1
	What is a Settlement Boundary?	2
	Methodology for Settlement Boundary Review	3
2	Settlement Boundary Review	5
2.1	Beeston Regis	5
2.2	Erpingham	5
2.3	Felmingham	5
2.4	Great Ryburgh	6
2.5	Itteringham	6
2.6	Langham	6
2.7	Neatishead	7
2.8	Northrepps	7
2.9	Stibbard	7
2.10	Tunstead	8
2.11	Worstead	8

Appendices

Appendix 1: Settlement Maps	9
--	----------

DRAFT

Settlement Boundary Review (Small Growth Villages)

Background Paper Addendum

1 Introduction

- 1.1. This addendum to Background Paper 11 - Settlement Boundary Review (Small Growth Villages), Examination Library document [C11](#), has been prepared to support the continued Local Plan examination.
- 1.2. Following public examination hearings held in early 2024, the appointed Inspector wrote to the Council setting out that more concrete steps needed to be taken to bring forward more housing. One of the options included the expansion of the list of small growth villages to include those *“with a single key service and (say) three secondary/ desirable services”*.
- 1.3. This document provides a review of the settlement boundaries in a number of potential additional new Small Growth Villages (SGV) which have been subject to review through an addendum to Background Paper 2 - Distribution of Growth [C2] and are being considered as having the potential to meet a revised criterion for SGVs. Where such settlements are subsequently proposed as SGV the accompanying policies map illustrates the proposed boundaries.
- 1.4. The approach follows that as set out original settlement boundary review paper examination library reference [C11], which supported the submitted Local Plan at the examination hearings hearing undertaken in February – March 2024. The Paper details the criteria used when determining if, and how, an existing or former settlement boundary should be changed, or a new one created as detailed below. The tables in Section 2 of this document explain the reasons for the proposed changes, with **Appendix 1** illustrating the proposed changes on an Ordnance Survey base map.
-
- 1.5. The following table details the Small Growth Villages considered in this document and the starting position from which boundary reviews were undertaken.

Small Growth Village	Starting Position for Boundary Review		
	North Norfolk Local Plan Boundary (1998)	North Norfolk Core Strategy Boundary (2008)	Neighbourhood Plan Established Boundary
Beeston Regis	✓	-	-
Erpingham	✓	-	-
Felmingham	✓	-	-
Great Ryburgh	✓	-	✓
Itteringham	-	-	-

Langham	✓	-	-
Neatishead	✓	-	-
Northrepps	✓	-	-
Stibbard	✓	-	-
Tunstead	✓	-	-
Worstead	✓	-	-

- 1.6. As part of the made [Neighbourhood Plan](#) for Ryburgh in 2021, Policy 3 identifies a settlement boundary for Great Ryburgh village and sought to enable appropriate infill development. This remains the most up to date boundary assessment and it is not considered appropriate to review this boundary as part of the local plan process. Revision, where necessary, should be undertaken through a revised neighbourhood plan process following the adoption of the emerging Local Plan.
- 1.7. New settlement boundaries are identified for the following Small Growth Villages, which have neither a defined settlement boundary in the current spatial hierarchy (Core Strategy, 2008) or in an adopted Neighbourhood Plan:
- Beeston Regis
 - Erpingham
 - Felmingham
 - Itteringham
 - Langham
 - Neatishead
 - Northrepps
 - Stibbard
 - Tunstead
 - Worstead

What is a Settlement Boundary?

- 1.8. Settlement Boundaries are a policy tool which establishes and contains built-up areas. A settlement boundary is a line drawn on a plan around a town or village, which reflects its built form. The purpose of a settlement boundary is to clearly define where there is a presumption in favour of development within the boundary, subject to compliance with other relevant Local Plan policies.
- 1.9. Areas outside of settlement boundaries are considered as open countryside, where a different policy approach applies regarding the types of development that may be permitted. The communities identified with settlement boundaries have a particular level of key services which underpins the sustainability of further development in that community.

- 1.10. To support this approach, the emerging Local Plan contains policies identifying 'Selected Settlements' with a boundary and illustrates those boundaries on the accompanying Policies Map.
-

Methodology for Settlement Boundary Review

- 1.11. A settlement boundary review has been undertaken as a desk-top study for each of the selected Small Growth Villages to ensure the boundaries are up to date and appropriate.

- 1.12. The approach taken for this review is identical to the approach followed in Background Paper 11 - Settlement Boundary Review (Small Growth Villages):

- Existing defined boundaries have been used as a starting point.
- Add in developments and planning permissions which have happened since the original boundaries were defined.
- Add in existing Local Plan allocations where these are yet to be built and where there is a remaining realistic prospect of development happening.
- Remove any former allocations which are now judged unlikely to be built.
- Audit the boundary to ensure it follows the logical extent of existing built-up areas including houses and their gardens (unless extensive incursions into the countryside would result), schools, public houses, commercial buildings, farmhouses and buildings, public parks and open spaces where appropriate. This process has been undertaken to define the extent of currently built-up areas where character is defined by consolidated areas of built development.

- 1.13. In applying the above approach, the following detailed criteria has been applied:

Criteria for inclusion within a boundary:

- a) Existing commitments for built development (i.e. planning permissions);
- b) Existing housing and mixed-use allocations within the Local Plan with the exception of those judged unlikely to be built;
- c) Curtilages of dwellings unless functionally separate to the dwelling or where the land has the capacity to significantly extend the built form of the settlement beyond what is considered to be appropriate;
- d) Properties which can be considered to be an integral part of the settlement (e.g. houses which are separated from adjacent properties by only very narrow gaps and are functionally and visually related to the urban area);
- e) In relation to farmyards and associated building, as a general rule only farmhouses and closely associated outbuildings on a settlement street frontage are included;
- f) School buildings;
- g) Adjoining small scale brownfield sites;
- h) Recreational or amenity open space, which is physically surrounded by the settlement or adjoined on three sides by the settlement;
- i) Doctor Surgeries.

Criteria for exclusion from a boundary:

- j) Existing Local Plan allocations which are now judged unlikely to be built.
- k) Areas of land which do not fit into the above categories, but which are presently included in the settlement boundary.

1.14. The process undertaken to audit the boundary includes a number of minor changes in each settlement in order to reflect and align to the latest available ordnance survey base mapping. These changes are considered as minor and logical adjustments and are not specifically referenced in this review.

DRAFT

2 Settlement Boundary Review

- 2.1. This section details the key changes made to the boundary for each settlement. Settlements are presented in alphabetical order. Each table explains the reasoning for any changes, including reference to the relevant methodology criteria outlined in section 1.
- 2.2. **Appendix 1** of this document contains mapping which illustrates the extent of the settlement boundaries as amended through this review document.

2.1 Beeston Regis

The review considered the Local Plan 1998 settlement boundary for Beeston Regis. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
BEE.01	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
BEE.02	G	Adjoining small-scale brownfield site.

2.2 Erpingham

The review considered the Local Plan 1998 settlement boundary for Erpingham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
ERP.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages, including curtilage of the Spread Eagle Public House.
ERP.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

2.3 Felmingham

The review considered the Local Plan 1998 settlement boundary for Felmingham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
FEL.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

FEL.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.03	K	Delete area of land which does not fit into the criteria but which is presently included within the settlement boundary.
FEL.04	K	Delete area of land which does not fit into the criteria but which is presently included within the settlement boundary.
FEL.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.07	C, D	Amend boundary to incorporate existing dwelling and its curtilage.

2.4 Great Ryburgh

No changes are proposed. It is not appropriate for the Local Plan process to propose changes to an adopted Neighbourhood Plan. The adopted [Ryburgh Neighbourhood Plan](#) Settlement Boundary for Great Ryburgh village is considered up to date and is not subject to review in this document. The settlement boundary can be viewed in Appendix 1.

2.5 Itteringham

No settlement boundary has previously been defined for Itteringham. In accordance with the criteria set out within the Settlement Boundary Methodology it is proposed to designate a new settlement boundary as defined in Appendix 1.

2.6 Langham

The review considered the Local Plan 1998 settlement boundary for Langham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
LAN.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages. To reflect permitted change of use of land from agricultural to garden from 1 The Green to 25 Holt Road (PF/01/0671).
LAN.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN. 07	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

2.7 Neatishead

The review considered the Local Plan 1998 settlement boundary for Neatishead. In accordance with the criteria set out within the Settlement Boundary Methodology, and subject to the settlement being selected as a SGV, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
NEA.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NEA.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NEA.03	D	Properties which can be considered to be an integral part of the settlement.

2.8 Northrepps

The review considered the Local Plan 1998 settlement boundary for Northrepps. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
NTR.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages (recently completed permission PF/20/1781 for 19 dwellings at Broadgate Close).
NTR.03	D, H	Amend boundary to incorporate recreation/amenity open space physically surrounded on three sides (includes village hall). Designate as an Education/Formal Recreational Area.
NTR.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

2.9 Stibbard

The review considered the Local Plan 1998 settlement boundary for Stibbard. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
STB.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.03	C, D, F, H	Amend boundary to incorporate school buildings, recreation/amenity open space physically surrounded on three sides, and existing dwelling

		and its curtilage. Designate the relevant open space as an Education/Formal Recreational Area.
STB.04	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.05	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.07	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.08	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.09	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.10	C, D	Amend boundary to incorporate existing dwelling and its curtilage.

2.10 Tunstead

The review considered the Local Plan 1998 settlement boundary for Tunstead. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
TUN.01	F	Amend boundary to incorporate all of school building and general hard surfacing and curtilage.
TUN.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.05	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
TUN.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.07	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
TUN.08	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

PF/24/0665 for three single storey dwellings on land east of market street is pending at the time of review and is therefore not a current commitment as it has no active permission. Therefore, this is not incorporated within the proposed boundary.

2.11 Worstead

The review considered the Local Plan 1998 settlement boundary for Worstead. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

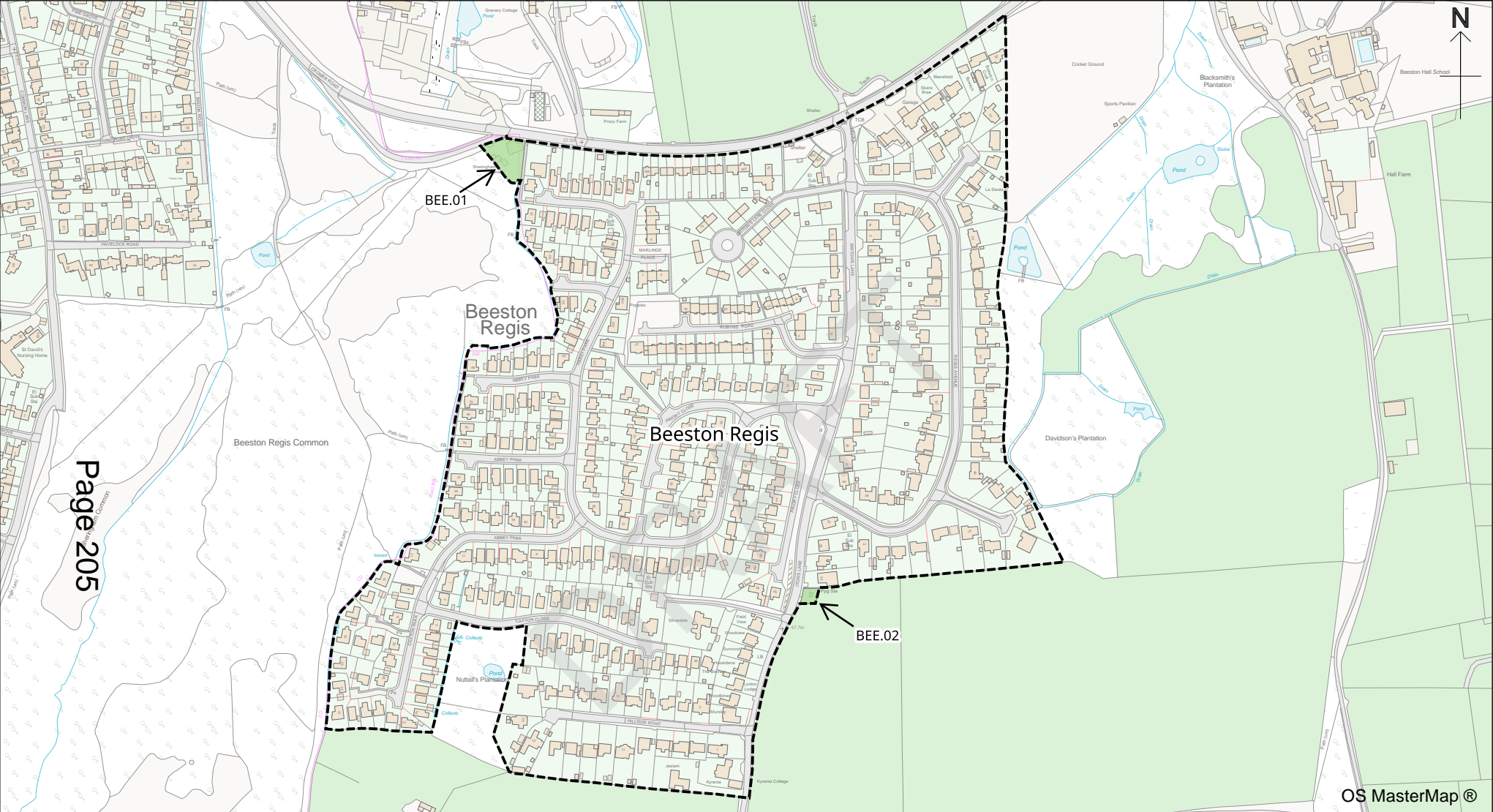
Site Reference	Criteria	Comment
WOR.01	C, D, F, H, G	Amend boundary to incorporate recreation/amenity open space physically surrounded on three sides (church yard), existing dwellings and their curtilages, village hall and car park.
WOR.02	G	Adjoining small-scale brownfield site.

Settlement Boundary Review (Small Growth Villages) Background Paper Addendum

Appendix 1: Settlement Maps

BLANK

DRAFT



Settlement Boundary Review (Small Growth Villages)

Beeston Regis

-  Proposed Addition
-  Proposed Deletion
-  Revised Settlement Boundary

NOT TO SCALE

CB

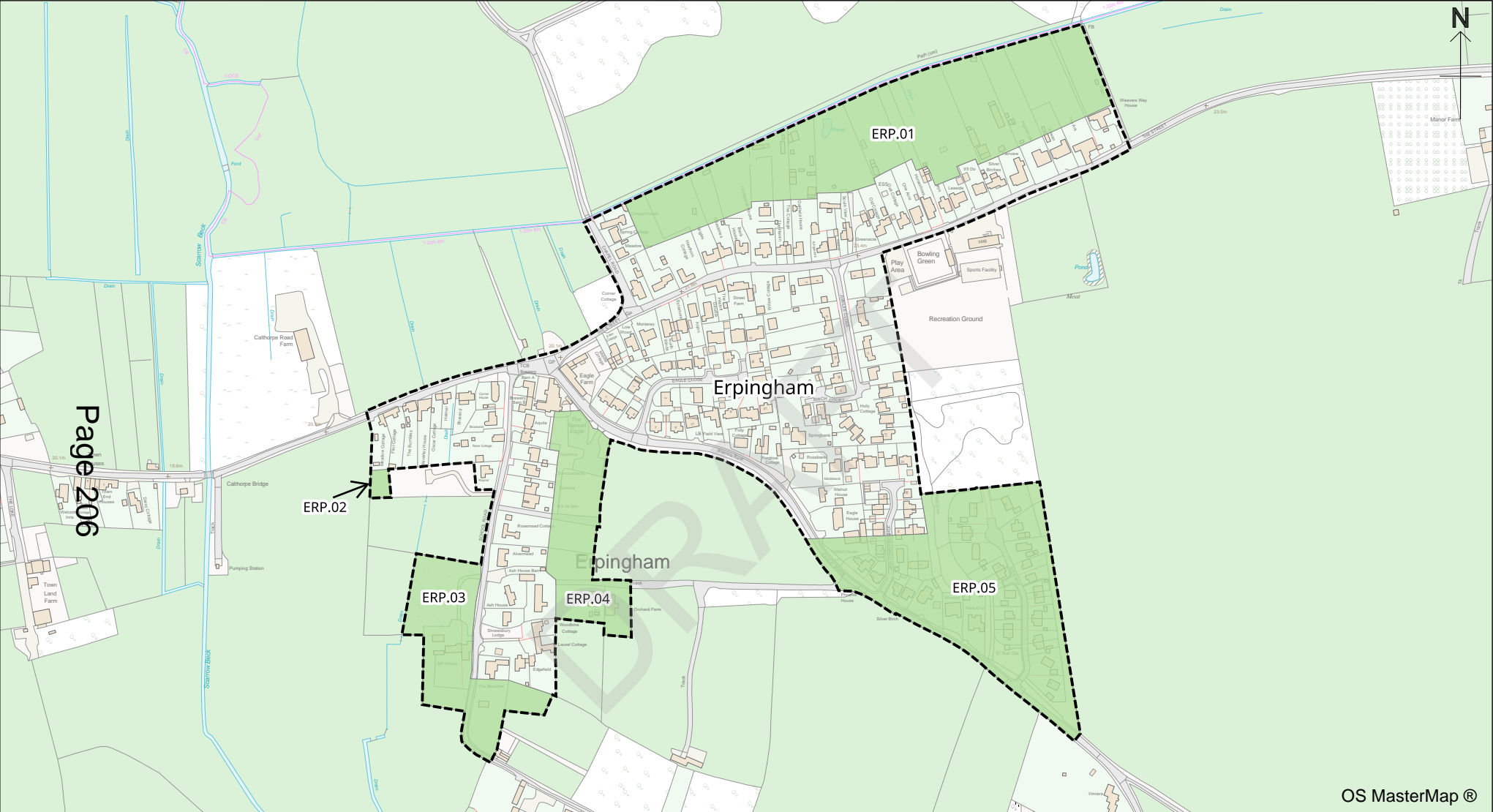
25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc

OS MasterMap®



Page 206

OS MasterMap®

Settlement Boundary Review (Small Growth Villages)

Erpingham

-  Proposed Addition
-  Proposed Deletion
-  Revised Settlement Boundary

NOT TO SCALE

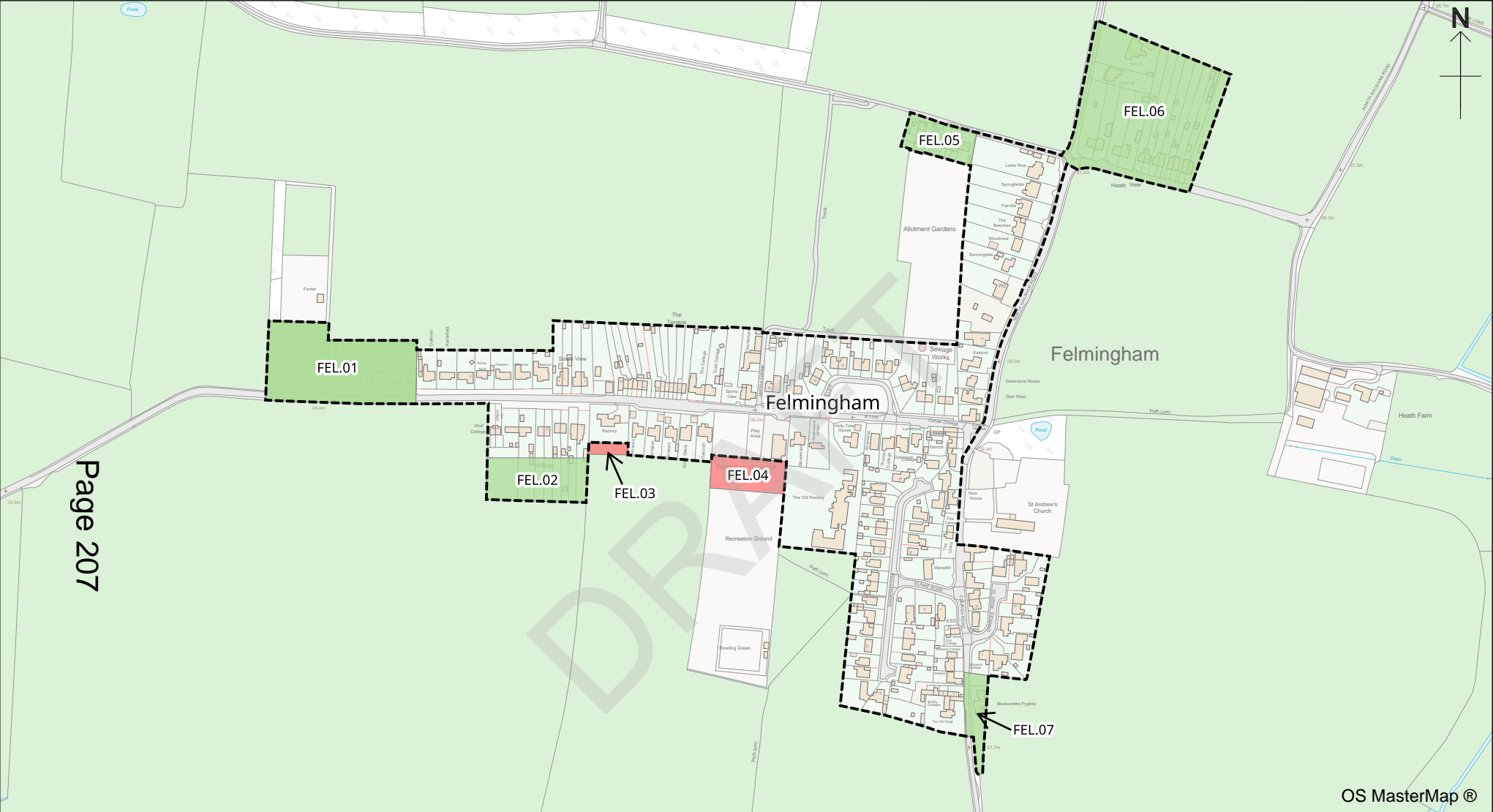
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



Settlement Boundary Review (Small Growth Villages)

Felmingham

- Proposed Addition
- Proposed Deletion
- Revised Settlement Boundary

NOT TO SCALE

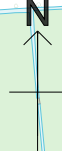
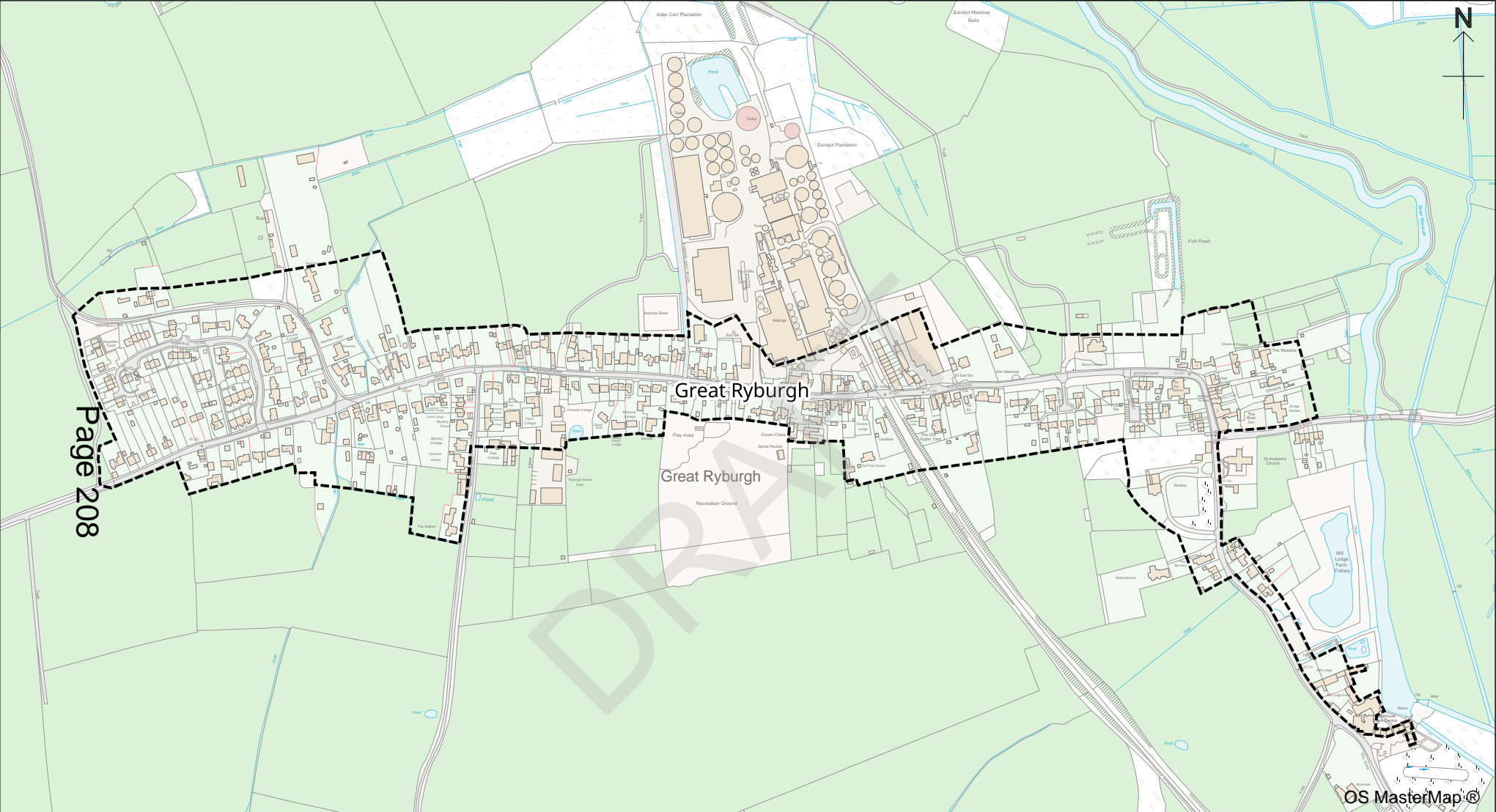
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



OS MasterMap®



Settlement Boundary Review (Small Growth Villages)

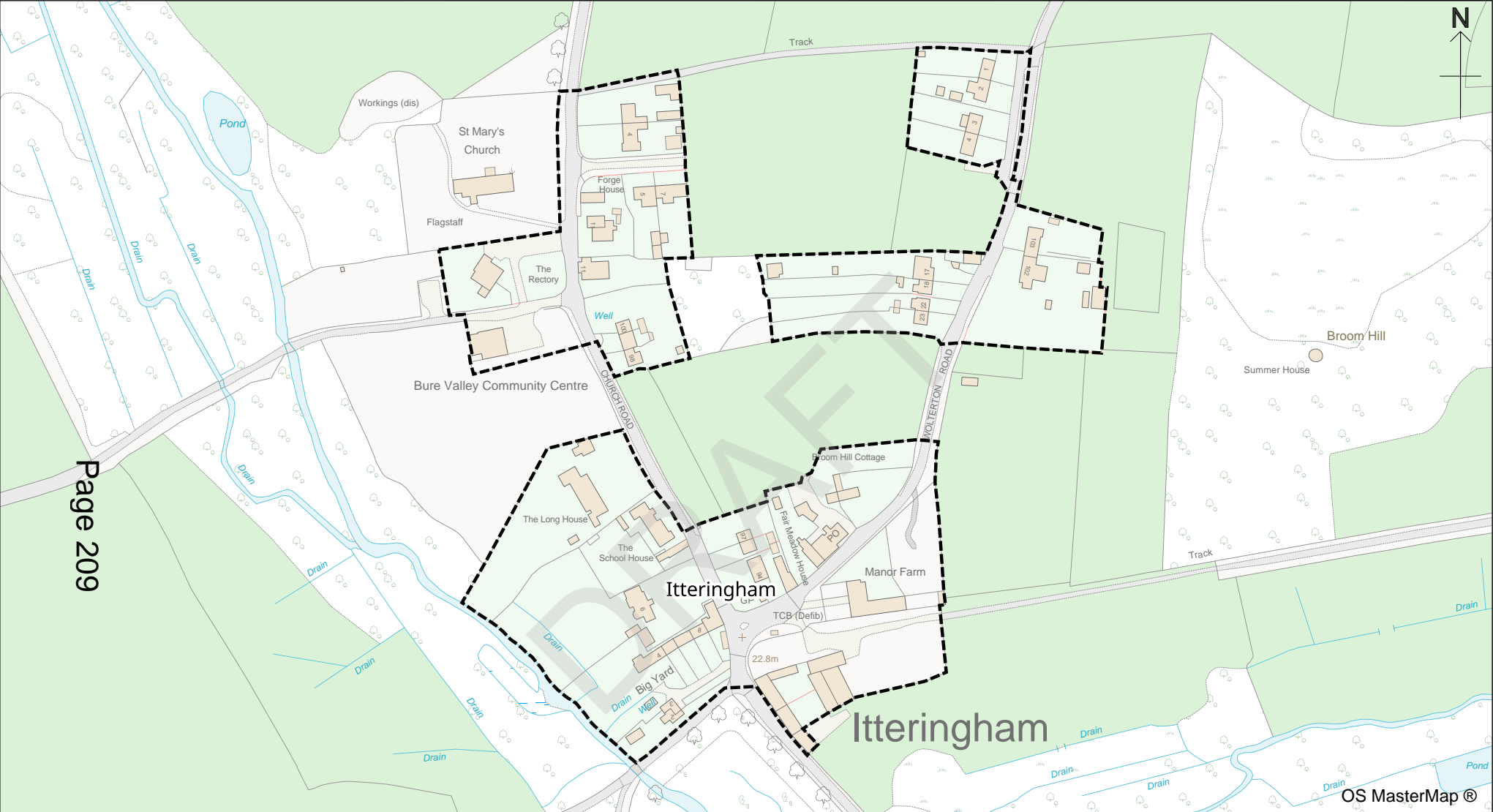
Great Ryburgh

- Proposed Addition
- Proposed Deletion
- Revised Settlement Boundary

NOT TO SCALE	CB
25/09/2024	
North Norfolk District Council Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN 01263 513811 www.north-norfolk.gov.uk	

© Crown Copyright
 and database right
 2024
 Ordnance Survey
 100018623

 Aerial Photos
 ©Getmapping plc



Settlement Boundary Review (Small Growth Villages)

Itteringham

-  Proposed Addition
-  Proposed Deletion
-  Revised Settlement Boundary

NOT TO SCALE

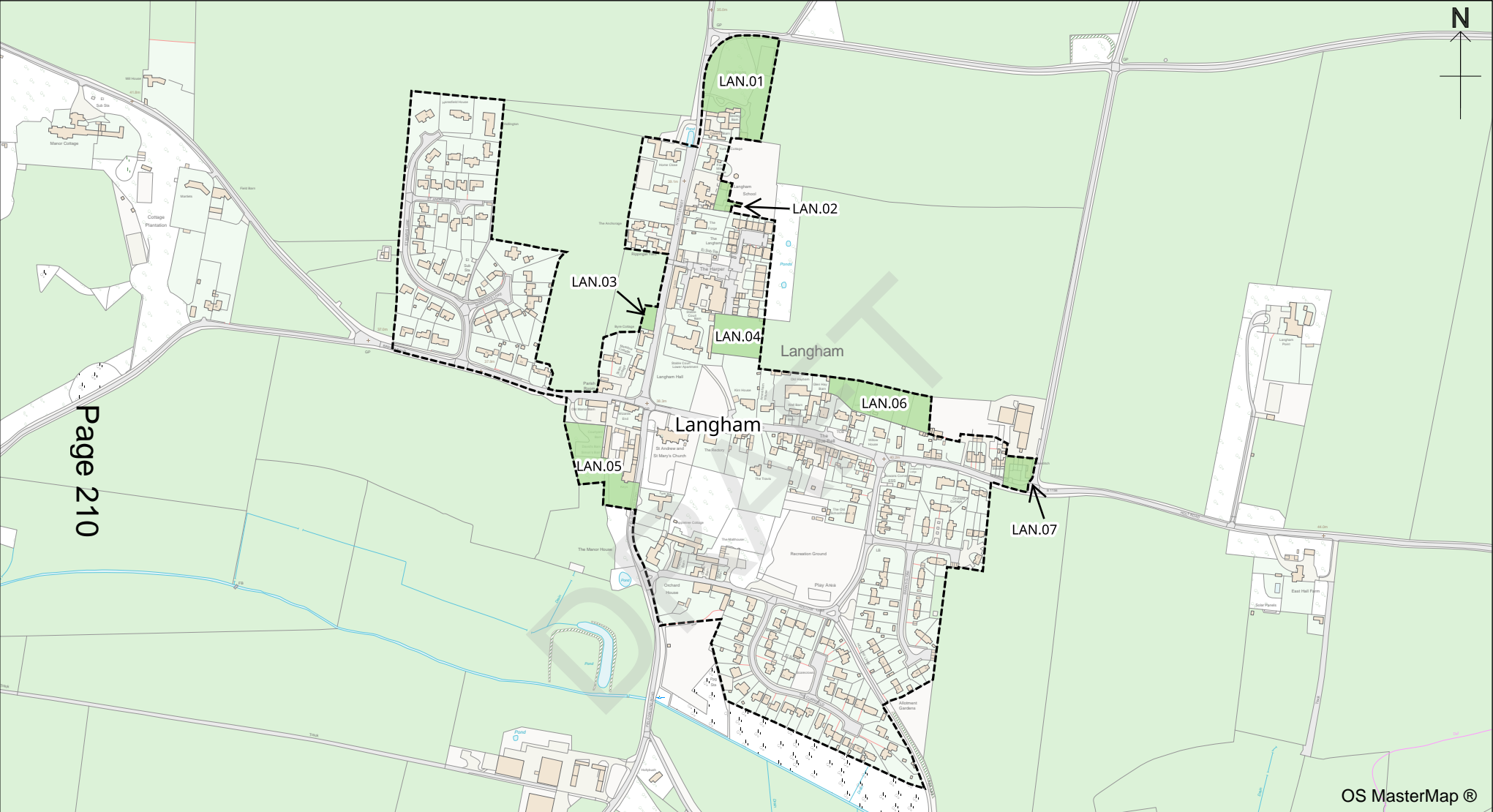
CB





25/09/2024

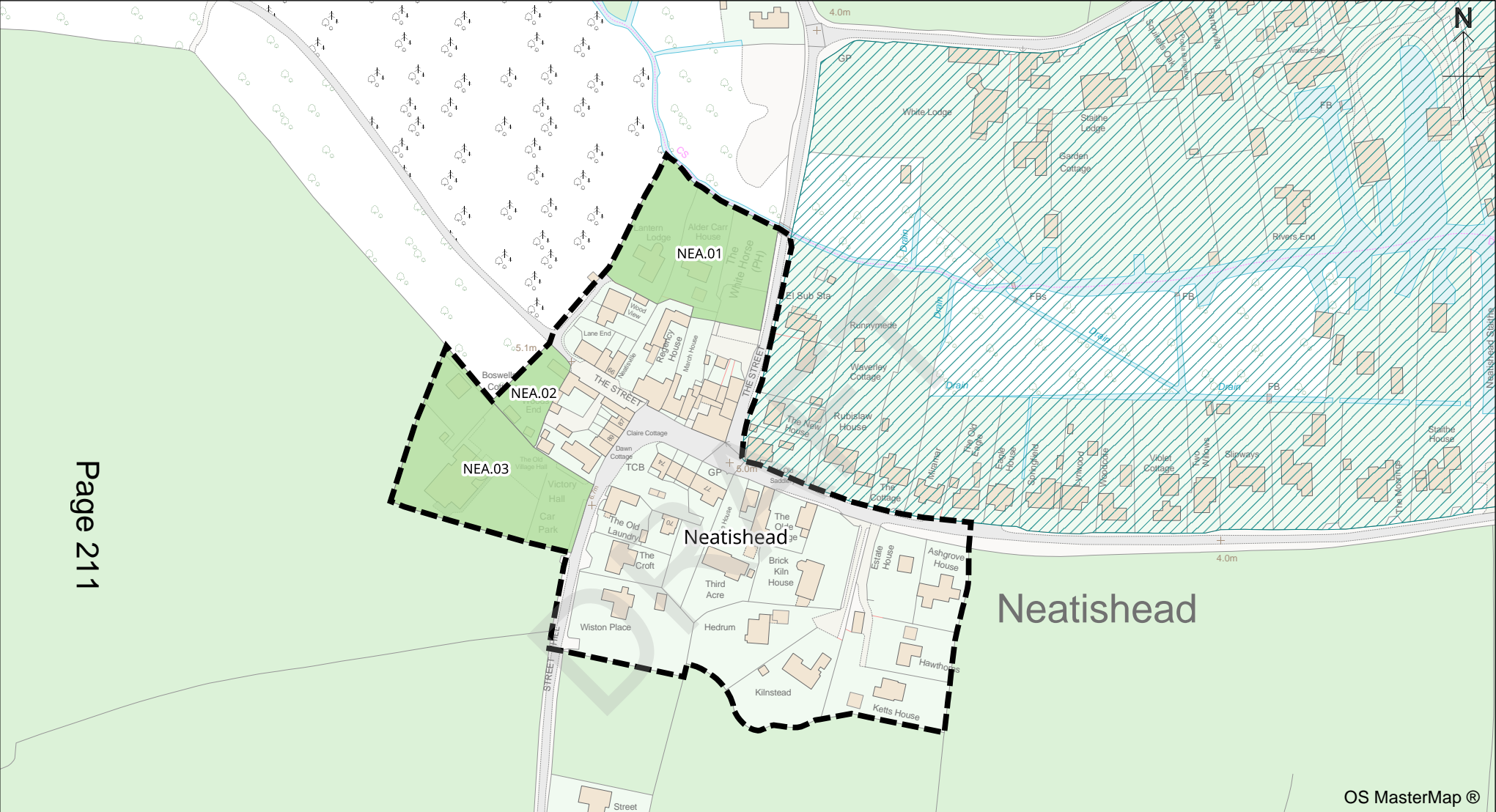
North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



 NORTH NORFOLK DISTRICT COUNCIL	Settlement Boundary Review (Small Growth Villages)			NOT TO SCALE	CB	© Crown Copyright and database right 2024 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc
	Langham			25/09/2024		
	 Proposed Addition	 Proposed Deletion	 Revised Settlement Boundary	North Norfolk District Council Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN 01263 513811 www.north-norfolk.gov.uk		



OS MasterMap ®

Settlement Boundary Review (Small Growth Villages)

Neatishead



Proposed Addition



Proposed Deletion



Broads Authority Executive Area



Revised Settlement Boundary

NOT TO SCALE

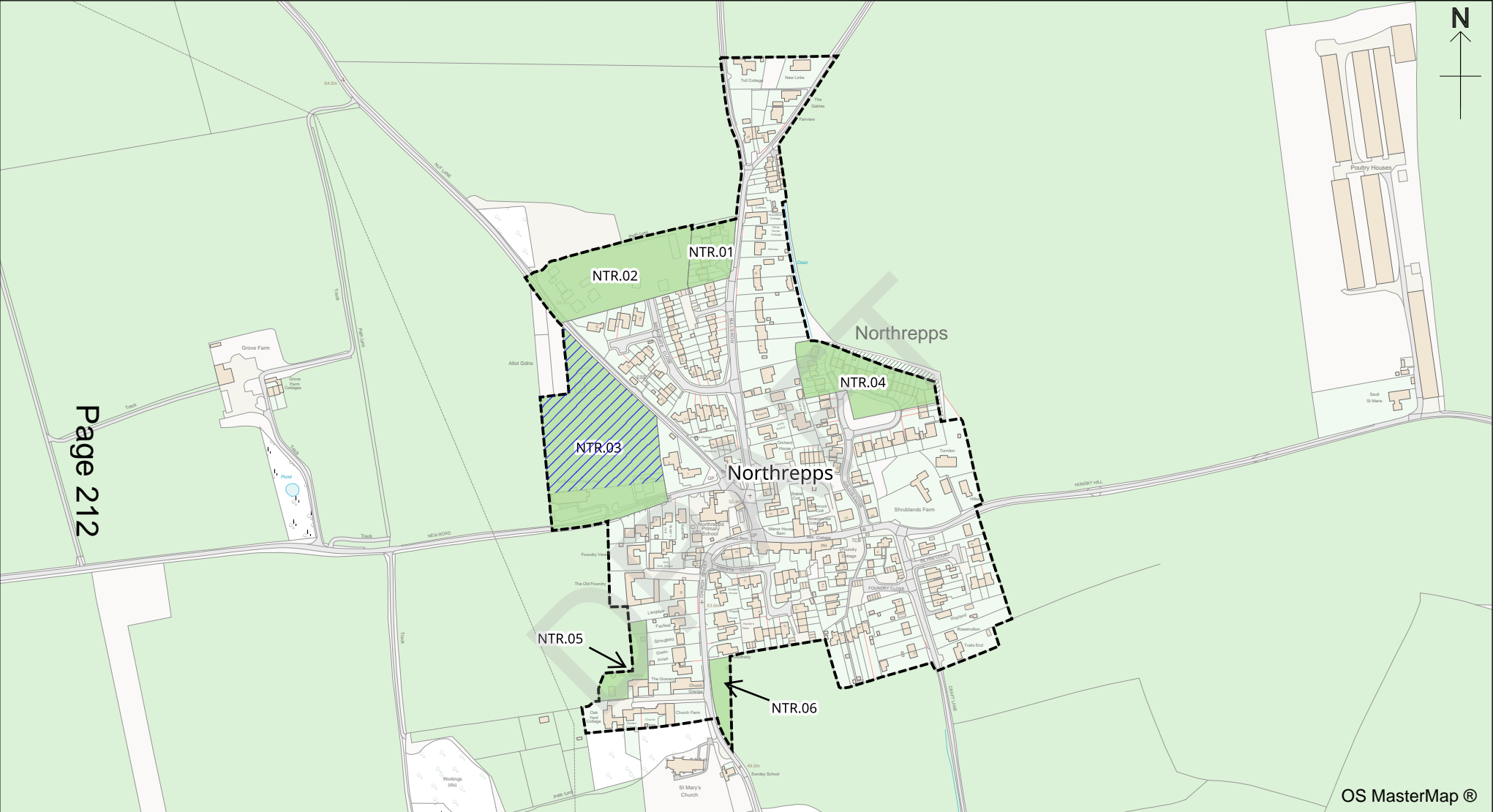
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



Settlement Boundary Review (Small Growth Villages)

Northrepps

Proposed Addition



Proposed Education / Formal Recreation Area



Proposed Deletion



Revised Settlement Boundary

NOT TO SCALE

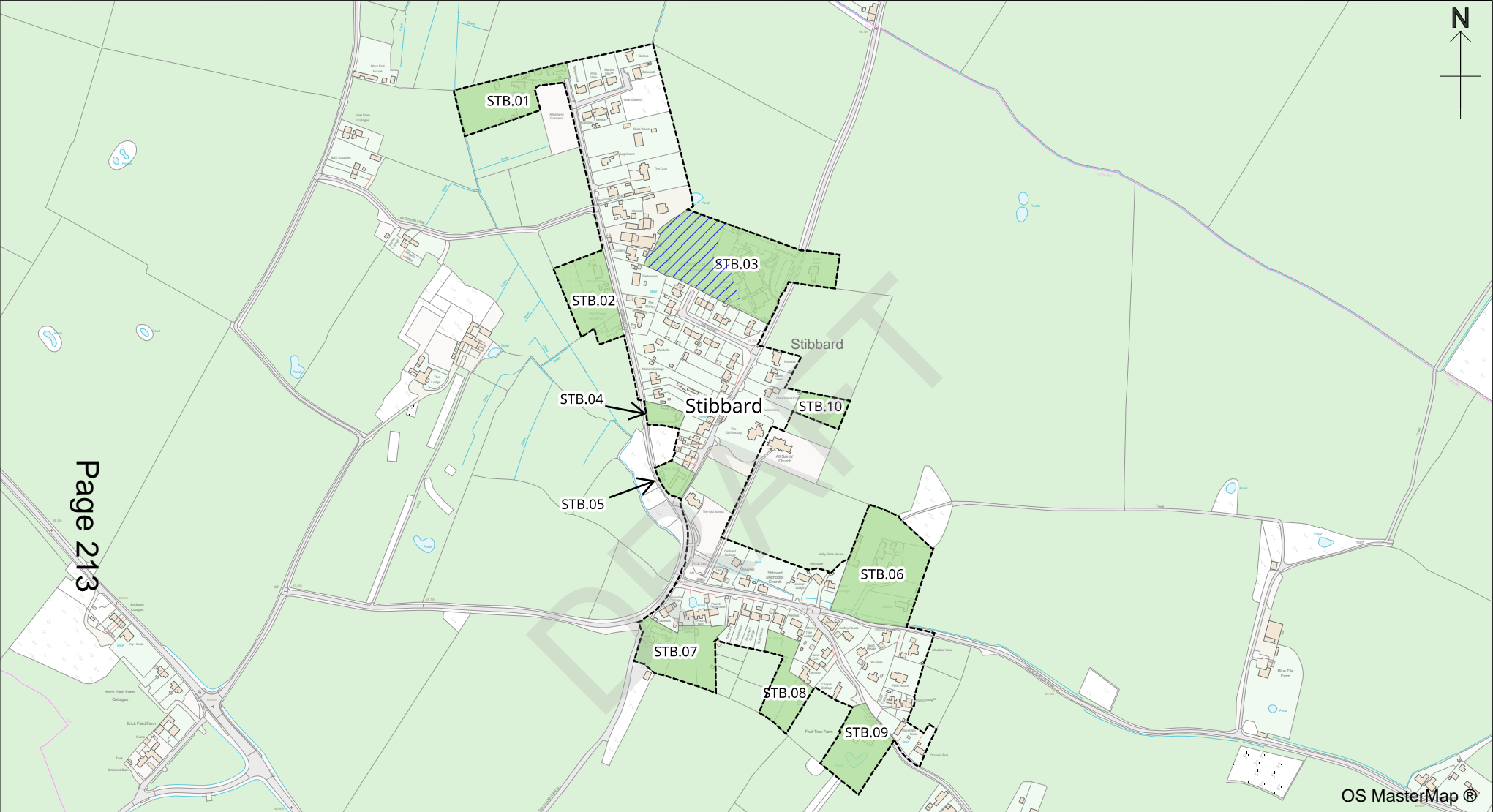
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc




OS MasterMap®

Settlement Boundary Review (Small Growth Villages)

Stibbard

 Proposed Addition

 Proposed Education / Formal Recreation Area

 Proposed Deletion

 Revised Settlement Boundary

NOT TO SCALE

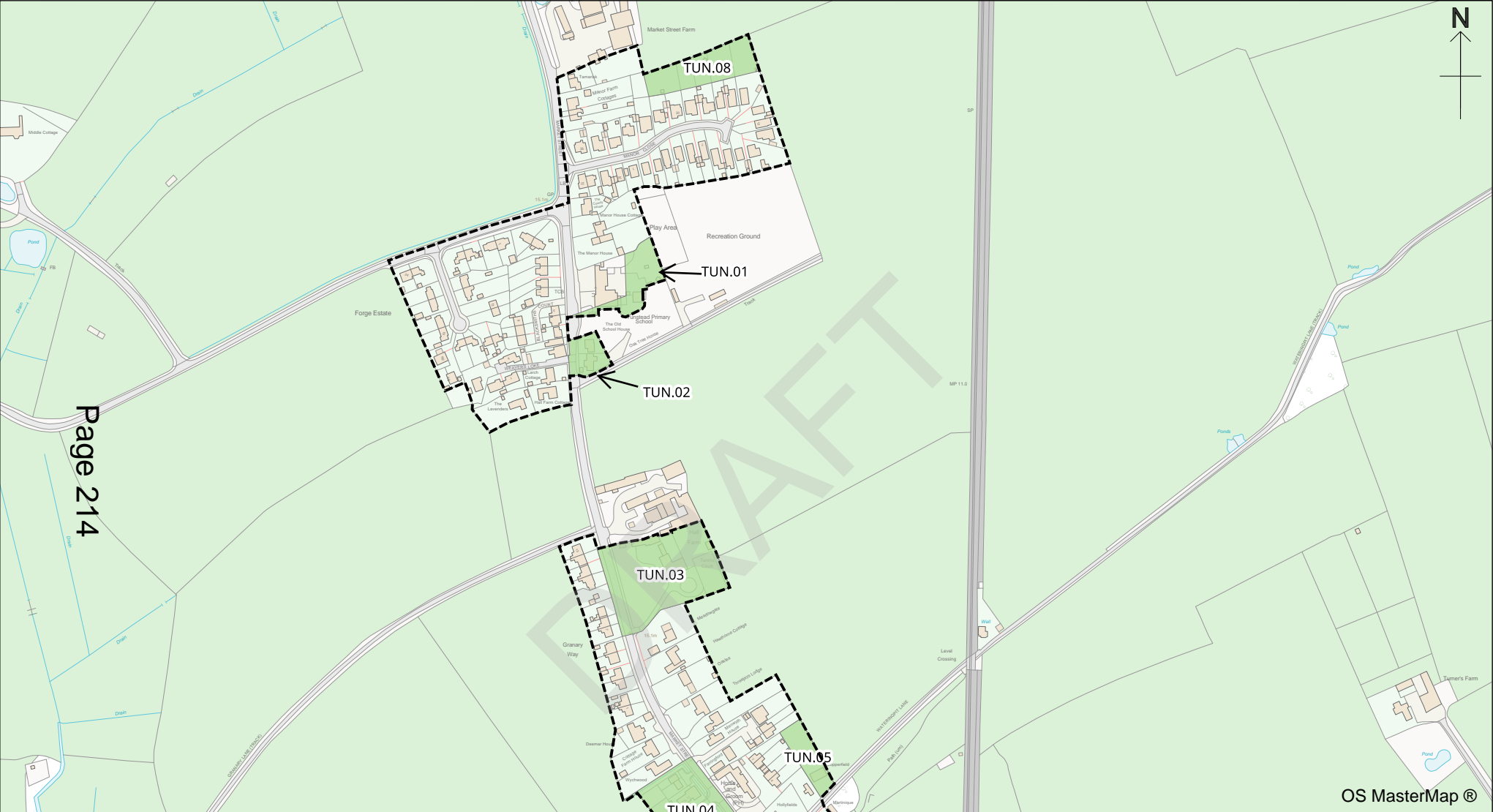
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



Settlement Boundary Review (Small Growth Villages)

Tunstead

-  Proposed Addition
-  Proposed Deletion
-  Revised Settlement Boundary

NOT TO SCALE

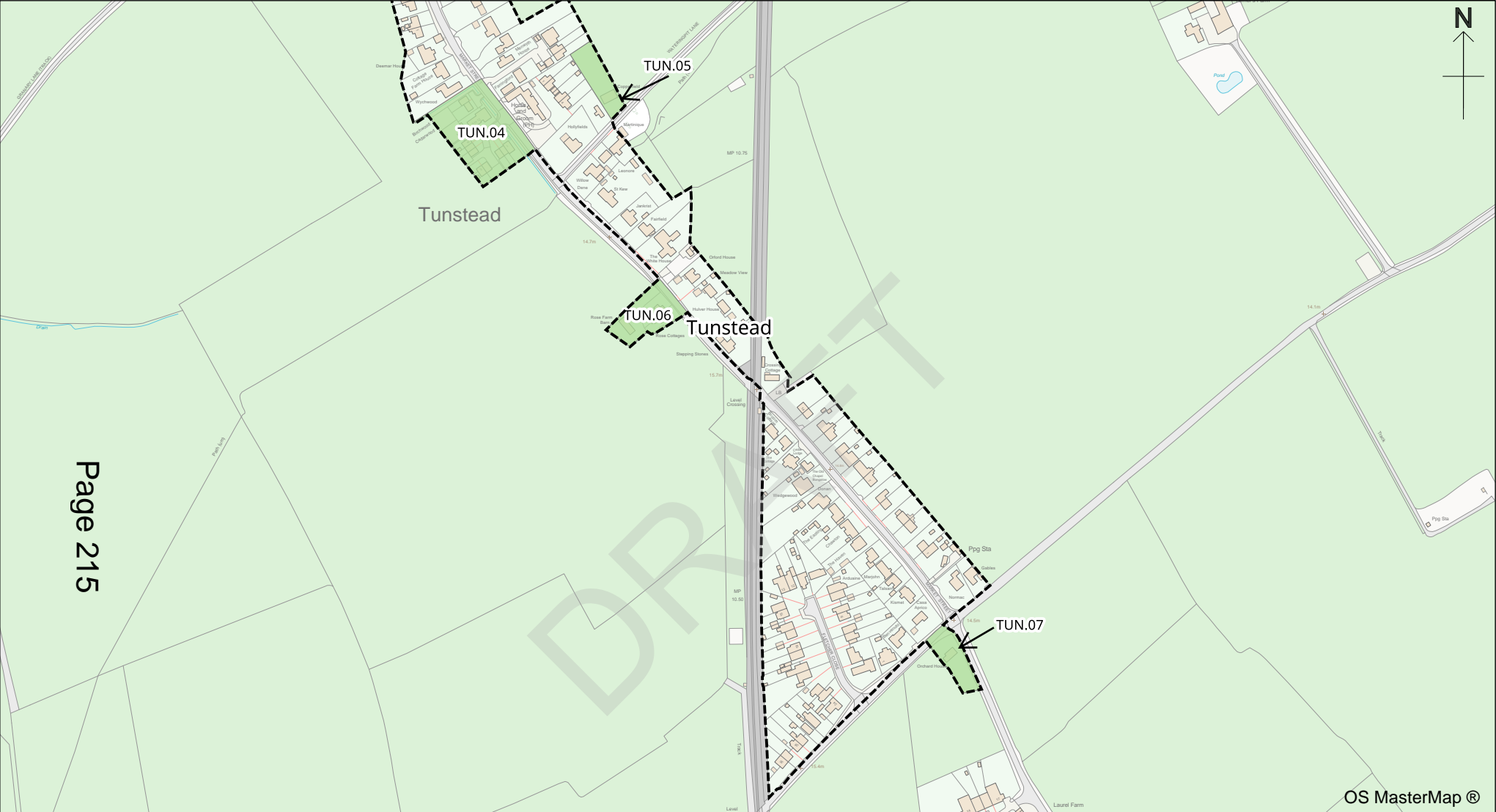
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



OS MasterMap®

Settlement Boundary Review (Small Growth Villages)

Tunstead

-  Proposed Addition
-  Proposed Deletion
-  Revised Settlement Boundary

NOT TO SCALE

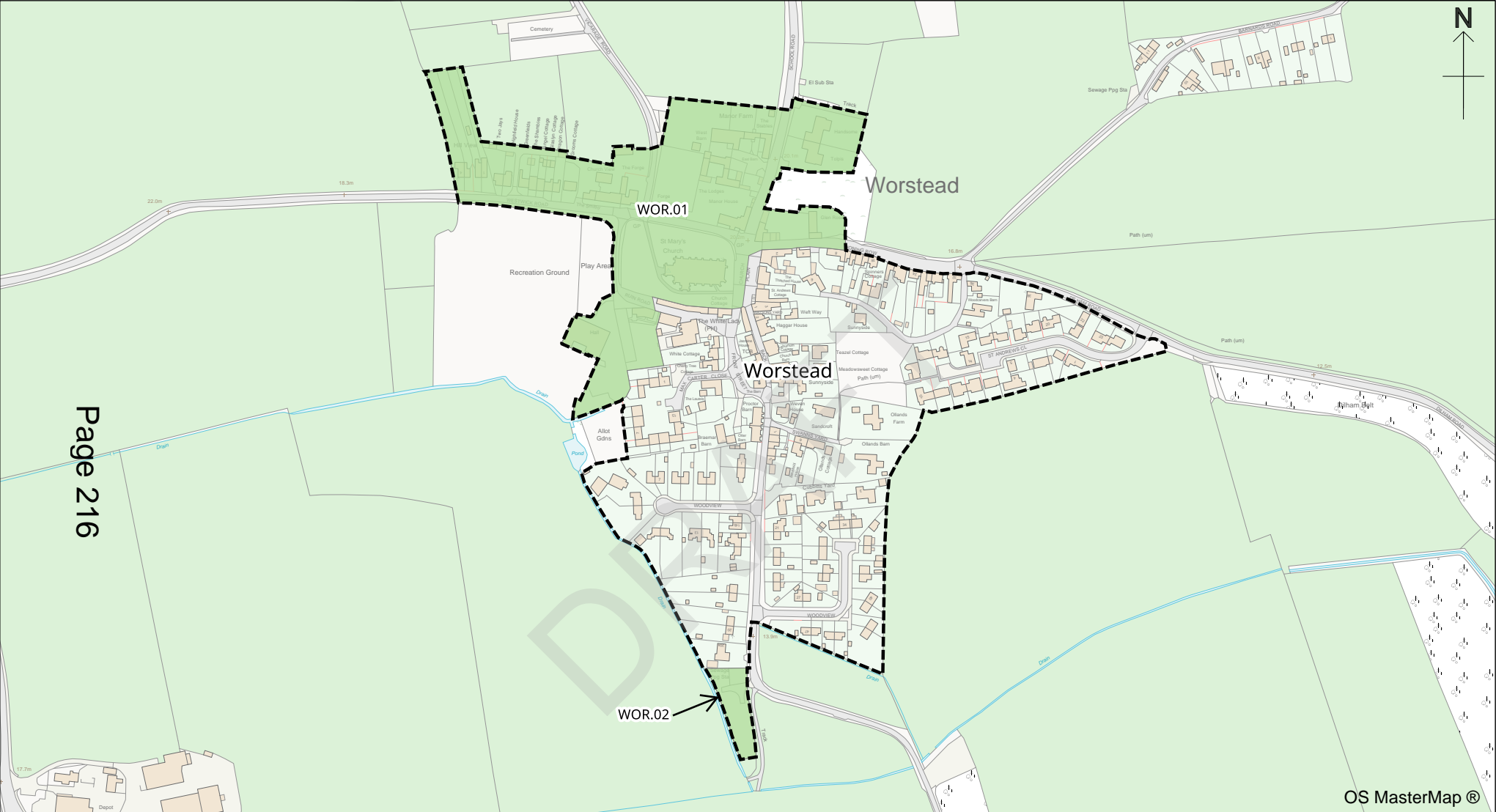
CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



OS MasterMap®

Settlement Boundary Review (Small Growth Villages)

Worstead

- Proposed Addition
- Proposed Deletion
- Revised Settlement Boundary

NOT TO SCALE

CB

25/09/2024

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2024
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc

Agenda Item 7

REPORT TITLE	Planning Reform Update
Executive Summary	The purpose of this report is to update Members in relation to planning reform with regard to the Council's response to the Government's consultation on proposed reforms to the NPPF.
Options considered.	None.
Consultation(s)	N/A
Recommendations	For information only
Reasons for recommendations	N/A
Background papers	Further supporting information and consultation documents can be found here

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement
Contact Officer	Report author: Iain Withington: Acting Planning Policy Manager. Response authors: Sarah Tudhope, Senior Planning Policy Officer. Russell Williams, Assistant Director Planning.

Links to key documents:	
Corporate Plan:	The report addresses all Five Corporate Priorities.
Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Planning application determination. Planning Policy – emerging and future approaches to local plan(s)

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 provide a brief update around planning reform and to inform Members of the NPPF consultation and the councils response.

2. Introduction & Background

- 2.1 The Government consulted on substantial proposed changes to the National Planning Policy Framework, NPPF, between 30th July and 24th September 2024. In addition, a series of wider policy proposals in relation to increasing planning fees, Local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects, NSIPs were also included in the material published.
- 2.2 The proposed changes to the NPPF, should they be implemented would have a significant impact on planning and development both locally and nationally. The proposals for increased planning fees would provide additional resource for planning. The other aspect of the consultation, government intervention in plan-making at this time, would have a limited impact on North Norfolk Council, primarily because we are currently being examined on the local plan under transitional arrangements under the September 2023 version of the NPPF. Should the local plan not progress to adoption in the anticipated timeline then the full impacts of the changes will need to be reflected in any future Plan and or Plan review.
- 2.3 The submitted response is attached as in Appendix 1
- 2.4 Our response is supportive of many of the planned policy changes e.g. grey/green belt, affordable housing (locally set evidence base priorities), and increasing planning fees to at least meet cost recovery and puts forward further considerations in these areas as well as commenting on how changes could be made to ensure local plans are more at the forefront in delivering on the climate change mitigation and adaptation agenda and developments incorporate the appropriate energy and water standards now.
- 2.5 There are a number of responses that do not support the proposed changes and or set out further considerations. These mainly focus on the proposed new methodology for assessing housing need and the proposed requirements for a five year housing land supply even where local plans have recently been adopted. In response to Q105 it is reported that the Council are *not optimistic that the new Planning and Infrastructure Bill in the next parliamentary session will deliver the radical changes to planning policy so badly needed.*

3. Background

- 3.1 The previous government's aim was to significantly raise housing delivery in England to 300,000 units per annum, with planning reform intended to contribute to raising delivery. Measures introduced included the Housing Delivery Test and the standard method for assessing housing need.
- 3.2 The 2020 Planning White Paper, [Planning for the Future](#), encompassed a new, simplified approach to plan-making, a streamlined development management system, speeding up the delivery of development, planning for infrastructure, and delivering change
- 3.3 However mainly attributed to bech bench pressure (my emphasis) there was a gradual watering down of policy on housing requirements set through local plans during the last parliament and very few aspects of the Planning for the Future have been implemented, though primary legislation has been enacted through the Levelling-up and Regeneration Act 2023.
- 3.4 Figures from the Department for Levelling Up, Housing and Communities ([DLUHC](#) – see figure 3 in particular) show that housing completion figures in England dropped steeply in the year ending September 2020 to 144,980. Completions recovered to a peak of 181,940 in the year ending June 2021 and have since fallen to 153,800 in the year ending March 2024.
- 3.4 Since coming into Office in July 2024, the new government has made planning a priority, stating that urgent reform is needed to the planning system to drive sustained economic growth and deliver more urgently needed housing. This includes significantly increasing housebuilding nationally to deliver 1.5 million homes in this parliament though a new housing requirement which aims to deliver around 370,000 homes per annum. Other priorities are driving development in the future economy sectors and ensuring that development supports an improved environment. To achieve this, government has moved extremely quickly since the general election and has announced a wide range of planning reforms.
- 3.5 A [policy statement](#) issued on 8th July committed the government to doubling onshore wind energy by 2030.
- 3.6 The King's speech on the 17th July 2024 outlined legislative changes that will take place through the Planning and Infrastructure Bill to speed up and streamline the planning process to build more homes and accelerate the delivery of infrastructure. The bill will also: revise compulsory purchase compensation so that it is "fair, but not excessive" to unlock development sites; modernise planning committees; increase local planning authorities' capacity and use development to fund nature recovery. The speech also announced the English Devolution Bill which will grant new planning powers to Mayors and combined authorities and will include measures to empower locals to buy community assets.
- 3.7 Matthew Pennycook MP, MHCLG, wrote to PINS on 30th July setting out the new government's position on how examinations should be conducted in regard to delays and the meaning of "pragmatism". A 'pragmatic' approach should be used only where it is likely that plans are capable of being found sound and any pauses for additional work should usually take no more than six months overall. Deficient plans that are unlikely to be found sound without significant additional work at examination should be sent back to allow the

local authority to bring forward a new plan in partnership with their communities.

- 3.8 On the 31st July the government published its vision for a [new generation of new towns](#). The underlying principle is that each new town will contain at least 10,000 homes and be delivered through exemplary development being *well connected, well designed, sustainable and attractive places where people want to live and have all the infrastructure, amenities and services necessary to sustain thriving communities*. The new towns development will also be led by a New Towns Code which will support the high standards being required, including the *target rate of 40% affordable housing, with a focus on social rented homes*. A Task force headed by Sir Michael Lyons is proposed to advise ministers on appropriate locations delivering a shortlist of recommendations within 12 months.
- 3.9 The New Homes Accelerator was first announced by the Chancellor on 8 July 2024 and launched on the 29th August 2024. It is a key component of the government's commitment to deliver 1.5 million new homes by the end of this Parliament. The New Homes Accelerator will focus on selected large-scale housing developments that are encountering significant delays or obstacles. Where large scale development is delayed or "stuck" we are invited to identify schemes so MHCLG can better understand and evaluate what support can be provided. Large scale is defined as 1,500 dwellings but PINS advises that smaller sites over 500 units may also qualify. Support may come in various forms, such as strategic advice, planning assistance or facilitation with stakeholders, depending on the issues that sites are experiencing. Submitting a site does not guarantee any follow up or government support. The application window closes at 11.59pm on Thursday 31 October 2024.
- 3.10 On 22nd September the MHCLG published a Planning reform Working Paper: [Brownfield Passport: making the most of urban land](#). It's understood this is a document that seeks discussion around options for a form of brownfield passport, which would be more specific about the development that should be regarded as acceptable, with the default answer to suitable proposals being a straightforward "yes".
- 3.11 It is understood that the previous government's intention to producing national Development Management policies will be retained. The intention of introducing an Infrastructure Levy though has been scrapped in favour of the retaining of the Community Infrastructure Levy (CIL) and Section 106 payments to provide infrastructure funding to support development.
- 3.12 Officers will continue to update members of the PPBWP when resources allow and as reforms and initiatives progress with more details become known.

4. The Consultation (proposed changes to the NPPF)

- 4.1 The consultation includes various documents including a [main document](#) that explains the proposed changes and contains the consultation questions, secondly a [NPPF draft document](#) which includes the proposed changes to the NPPF shown as tracked changes, and thirdly an Outcomes spreadsheet available from the [main consultation website](#) which sets out the prescribed housing requirements for each LPA resulting from the proposed revised method of calculating housing needs on a regional and district basis.
- 4.2 The consultation consists of 106 questions which are set out in relation to a number of themes and packaged around the need for urgent reform is

needed in the planning system to drive sustained economic growth. They include:

- Making the standard method for assessing housing needs through local plans mandatory
- Reversing other recent changes to the NPPF to promote housing delivery
- Strengthening policy to promote the development of brownfield land and stating that plans should promote an uplift in density in urban areas
- Identifying grey belt development land within the green belt
- Improving “the presumption in favour of sustainable development” to support housing supply, by clarifying when it applies and making it clear that its use cannot justify poor quality development
- Delivering affordable, well-designed homes
- Making wider changes to ensure that local planning authorities can prioritise the types of affordable homes their communities need and that the planning system supports a more diverse housebuilding sector
- Supporting economic growth in key sectors, aligned with the Government’s industrial strategy and future local growth plans, including laboratories, gigafactories, datacentres, digital economies and freight and logistics.
- Delivering community needs to support society and the creation of healthy places.
- Supporting clean energy and the environment, including through support for onshore wind and renewables.

4.3 The current standard methodology based on population projections (2014) established a dwelling requirements of 557dpa for North Norfolk. A requirement that the local plan in agreement with the Inspector now seeks to deliver. (an increase from the submitted plan which was 480 dpa). The housing requirements for North Norfolk under the new system would be 943 dpa, i.e. a 70% increase.

4.4 For comparison the proposed requirements for adjacent authorities is provided below:

District	Annual requirements current methodology	Annual requirement proposed methodology	Increase between methodologies (%)	Change from current local plan (%) (i.e. current adopted plan)
North Norfolk	557	943	70	136
Breckland	625	917	45	50
Kings Lynn & West Norfolk	554	1,042	88	58
Great Yarmouth	354	569	61	36
Broadland	501	877	75	25
South Norfolk	821	942	15	10
Norwich	606	828	37	75
Greater	1,928	2,647	37	30

Norwich				
---------	--	--	--	--

Source: NSF/ Norwich City Council

- 4.5 Arguably the key question is one that the consultation doesn't directly ask – it is whether there is support for the Government's Plan to increase the [national target](#) for North Norfolk from 557 new dwellings per annum (using the current standard method) to 943 dwellings per annum (i.e. a 70% increase) (using their new proposed method).
- 4.6 Commentary is provided on this within the answer to Question 15 - Appendix 1 and set out here too. Basically, our submission was that the Council strongly opposes the increase in the district's housing requirement that would result from the proposed changes to the standard method. There would be a 70% increase from one standard methodology to the next. It should also be noted that this would amount to a 136% increase from the current adopted Local Plan requirement of 400 dpa. Furthermore, our records demonstrate that between 1 April 2001 and 31 March 2024 there have been 8,604 completions which equates to an annual average trend of 374 dpa. The best year (2017/18) in terms of number of homes delivered achieved 546 new homes. Last year's delivery (2023/24) was 232 dwellings.
- 4.7 In addition, the following points are considered relevant:
- Market absorption rates tend to guide build out rates. Build rates tend to be determined by developers, who regardless of national and local targets will not build more houses than can be sold at a profit that they consider acceptable. This tends to mean that developers ensure that new housing does not 'flood' an area to the extent that it significantly affects sales prices;
 - 35% (approx. 34,500ha out of 98,500ha) of the Council's administrative area has a statutory landscape or nature protection designation (e.g. SAC, SPA, SSSI, RAMSAR, Local Nature Reserves, National Nature Reserves, Undeveloped Coast, Heritage Coast, Norfolk Coast National Landscape, Scheduled Monuments and Registered Parks & Gardens);
 - 35.5% (approx. 35,000ha out of 98,500ha) of the Council's administrative area is at risk of flooding (Coastal Constraint Management Area, Flood Risk Zone 2, 3, 3a);
 - 56% (approx. 55,350ha out of 98,500ha) of the Council's administrative area is in a Nutrient Neutrality Surface Water Catchment Zone;
 - The district is bordered to its north by the sea and has some 45 miles of coast, with significant areas subject to or at risk from coastal erosion,
 - Our 3 largest towns of North Walsham, Fakenham and Cromer have populations of approximately 12,930, 8,060 and 7,760 respectively and are already taking significant growth to enable us to hit our existing housing targets
 - We have the oldest population in the country and significant pressures in the health and social care sectors and concerns about the potential for economic growth in our fairly remote and sparsely populated district to support new residents
 - There is no evidence that there is the available infrastructure to support the far higher levels of growth in our area and no published plans for upgrades that would be required in relation to, amongst other matters, water supply, sewerage capacity and electricity provision.
 - With regard to affordable housing there are currently only two providers interested in delivering their product in the district because of the extra challenges developing in this detached area bring."

- 4.8 In relation to transitional arrangements and in recognition that local authorities across England will have plans at various stages of development, transitional arrangements have been proposed in the consultation document. The transitional arrangements seek to balance keeping plans progressing to adoption with making sure they provide for sufficient new housing. These vary according to the stage the plan has reached within one month of publication of the revised version of the NPPF.
- 4.9 Plans at examination will be allowed to continue (and will be examined under the same version of the NPPF they were prepared under). However, where there is a **significant gap of more than 200 dwellings between the plan's housing requirement and the new local housing need figure, authorities will be expected to begin a new plan at the earliest opportunity in the new system.**
- 4.10 Plans at an advanced stage of preparation (Regulation 19) will also be allowed to continue to examination under the version of the NPPF that they have been prepared under, unless there is a significant gap of more than 200 dwellings between the plan's housing requirement and the new local housing need figure, in which case authorities will be asked to rework their plans to take account of the higher figure and will be examined under the revised version of the National Planning Policy Framework.
- 4.11 Authorities at an earlier stage of plan preparation should prepare plans against the revised version of the National Planning Policy Framework and progress them as quickly as possible.
- 4.12 Commentary is provided on these arrangements in questions 103 – 105 and summarised below.
- 4.13 Essentially, we recognise that transitional arrangements are necessary and as such welcomed to allow for the continuation of well-progressed local plans, as forcing a restart would result in further delays to sustainable housing development and place additional strain on limited resources. However, the 200-dwelling threshold is considered too rigid / strict / small. A higher threshold would be more appropriate, particularly for those plans that are at the latter stages of examination. Having to begin preparation of another plan so quickly could harm / reduce public confidence in the plan making system.
- 4.14 Consideration should be given to adjusting the threshold based on local context and housing market signals. Introducing some flexibility may help accommodate varying areas needs and reduce administrative burden.

5. Corporate Priorities

- 7.1 The report addresses all Five Corporate Priorities.

6. Financial and Resource Implications

- 8.1 None at this stage – should the recommendations come into effect through revisions to national policy there will be knock on effects to resources, training and fees.

9 Legal Implications

- 9.1 none at this stage – should the recommendations come into effect through revisions to national policy future planning decisions and strategy work will need to comply.

10 Risks

10.1 N/A

11 Net Zero Target

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

12 Equality, Diversity & Inclusion

12.1 N/A

13 Community Safety issues

N/A

14 Conclusion and Recommendations

The report is for information only

Appendix

Appendix 1 - Consultation response

End

North Norfolk District Council

Response to NPPF consultation

24th September 2024

Not all the questions are relevant to the District Council (e.g. we have no green belt within or adjacent to our area) and therefore we are only responding to some – rather than all – of the questions set.

This response will be tabled for a meeting of the Council's Planning Policy and Built Heritage Working Party on 10th October 2024 – where 'endorsement' of these comments will be sought. The responses below are submitted by Officers on behalf of the Council – following discussions with the Planning Portfolio Holder and the Council Leader.

Chapter 3 – Planning for the homes we need

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

We agree that the changes made in December 2023 were unhelpful. However, that doesn't mean we support the methodology espoused within the draft NPPF.

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

As referred to above, there is some lack of clarity between the proposed amendments to Para 61 and the statement under Para 6 of the consultation document referring to justification of a lower housing requirement etc. Are the requirements to be mandatory for all or will there be some 'specific circumstances'? If future guidance is to clarify this, it would be useful to have reference within the NPPF itself and for you to first consult on the wording on any such local justification process.

It may be that any such proposals should be tested early in a Plan's production by some form of external assessment.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

The 'urban uplift' does not apply to North Norfolk. However, the understanding is that the application of the 'urban uplift' has not delivered and the Council has no objection to the deletion of Para 62.

However, the proposed significant reduction in housing numbers to many urban areas compared to the existing methodology should be considered carefully. This is because a significant proportion of the homes needed nationally should be located in cities and their Functional Economic Areas (FEAs) where there is good access to jobs and services. As the consultation states that there should be an uplift in density in urban areas, the relative contribution of large towns and cities and their FEAs to achieving national housing delivery targets should be carefully considered.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

The clarification is welcomed. The Council has some concern that by bringing more local authorities within the 'presumption' (as mentioned in the consultation document), strategies agreed in recently adopted Local Plans will be undermined and this could also affect the confidence of the public in the local plan process and planning as a whole.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No. Local Authorities should be able to rely on an adopted Local Plan being free from challenge in terms of land supply for its first 5 years, provided the plan was able to demonstrate a 5 year housing land supply at examination. Being able to have confidence in recently adopted strategies is important to maintain overall confidence in the planning system.

Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

It is unclear what benefit there is in removing this reference. If a new standard method calculation is to be set out in guidance reference to this should be maintained for clarity.

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

A buffer of 5% allows for increased flexibility, potentially encourages competition among developers, may improve delivery rates and contribute to market stability.

However, it can also result in additional pressure on Local Planning Authorities to identify and allocate more land than is required. This could lead to more delays in the planning process, with the knock-on effect of an area finding itself subject to the 'presumption', further diluting the overall objectives of a plan led system. There is also the possibility of a buffer resulting in overdevelopment, more housing being built than is needed, negatively impacting local infrastructure and service.

Question 10: *If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?*

If a buffer is required, 5% is considered appropriate.

Question 11: *Do you agree with the removal of policy on Annual Position Statements?*

Yes

Question 12: *Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?*

The Council welcomes additional support for cross-boundary and strategic planning matters. In practice a 'duty to cooperate' can be difficult to comply with. Political differences between councils, time constraints and resourcing can have significant impacts on these matters.

Question 13: *Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?*

Greater flexibility may be needed for the soundness criteria to be adaptive to different contexts and scales of development.

Chapter 4 - A new Standard Method for assessing housing needs

Question 15: *Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?*

Replacing outdated census figures as the basis with an across the country set 0.8% of housing stock is overly simplistic. It needs to be much more nuanced. Centralised targets of 300 now 370 thousand new builds per year have not worked and we are not confident this national baseline will work either. If a national methodology is used then it should include factors related to age and economic demographics as well as housing numbers and affordability.

The current standard method is widely regarded as problematic, with the 2014 figures known to be inconsistent, and for North Norfolk these project forward a rate of growth which has been shown not to have occurred. These flawed projections are therefore considered by the Council to be an unreliable basis on which to establish future requirements.

Use of existing housing stock levels could provide a more consistent and predictable measure for calculating housing need. However, the Council is concerned that the proposed method may be overly simplified and, whilst it appears to be able to deliver the overall numbers for the country, it would result in some odd and likely unachievable requirements in certain areas. It is suggested that the proposed method needs to include important local considerations (including but not limited to environmental and infrastructure capacity) rather than being entirely based on a centralised target.

Market absorption rates tend to ensure that new housing does not flood an area to the extent that it significantly affects sales prices. The proposed approach is unlikely to resolve affordability challenges in such areas. A more specific approach to affordable housing may be needed to make any meaningful impact on affordability.

There also needs to be acknowledgement from the Government that although councils are responsible for allocating land for development in their local plans, build rates are determined by developers, who regardless of national and local targets will not build more houses than can be sold at a profit that they consider acceptable. Hence the recognised disconnect between permissions granted and completions.

For the avoidance of doubt, North Norfolk District Council strongly opposes the increase in the District's housing requirement that would result from the proposed changes to the standard methodology. There would be a 70% increase from one national methodology (556pa) to the next (943 pa) – and a 136% increase from our current adopted Local Plan requirement of 400 pa. The Council is concerned that it would be being set up to fail, as – among other reasons – it is unlikely that the market would be able to deliver such a high number of dwellings per annum.

To evidence this, our records demonstrate that between 1 April 2001 and 31 March 2024 there have been 8,604 completions which equates to an annual average trend of 374 dpa. The best year (2017/18) in terms of number of homes delivered achieved 546 new homes. Setting ambitious targets is one thing – setting unrealistic targets is another – and that is without reference to factors such as the 35% of the Council's administrative area that has a statutory landscape or nature protection designation (The key nationally designated and statutory constraints to major development used to determine the percentage of district coverage are: SAC, SPA, SSSI, RAMSAR, Local Nature Reserves, National Nature Reserves, Undeveloped Coast, Heritage Coast, Norfolk Coast National Landscape, Scheduled Monuments and Registered Parks & Gardens) – or the 35% of the Council's administrative area is at risk of flooding (Coastal Constraint Management Area, Flood Risk Zone 2, 3, 3a) – or the 56% of 98,500ha) of the Council's administrative area that is affected by Nutrient Neutrality requirements.

Question 16: *Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?*

Using an average figure may provide a more consistent number/requirement. However, it might also be appropriate to consider additional factors ('local considerations') such as local housing needs, economic trends and demographic changes.

Question 17: *Do you agree that affordability is given an appropriate weighting within the proposed standard method?*

It is important to recognise affordability pressures however, it is unclear if increasing the 'need' figure will actually improve affordability. See also the answer to Q15 regarding market absorption rates. If affordability is to be a factor then the Government needs to ensure that such areas that have their targets increased as a consequence also clearly benefit from more affordable provision.

Question 18: *Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?*

It is agreed that it is important to address rental costs (also see answer to Q 57) however, it is not obvious how rental affordability could be factored into the proposed model or how any such incorporation would achieve greater delivery and or lower house prices or rents.

Question 19: *Do you have any additional comments on the proposed method for assessing housing needs?*

The proposed method would result in a very significant increase in the Council's housing requirement. This is way above any number that has previously been achieved. Concern is raised that the proposed methodology will set requirements that are unachievable in many areas and that the market would not deliver even if the 'presumption' is engaged.

Removal of the cap is not guaranteed to increase delivery and risks further speculative development that ignores proper assessment and delivery of accompanying infrastructure and services and undermines the plan led system.

In addition, under the proposed methodology, 24 of the 33 London boroughs, and some cities, would see their housing need decrease significantly, with some falling by around 50% and some other cities would rise by over 100%.

It is considered that there is potential to increase the role of core cities and other large urban areas and their FEAs and to remove some of the discrepancies between the additional growth that would be required in some predominantly rural areas, such as North Norfolk, along with areas that have a weak housing market, that would result from the proposed methodology.

Large rural districts such as North Norfolk, have somewhat restricted access to services and facilities so more significant growth could lead to less sustainable patterns of development with even greater reliance on travel by private car. This would conflict with one of the aims of the NPPF to achieve more sustainable travel patterns.

Chapter 5 - Brownfield, grey belt and the Green Belt

Question 38: *How and at what level should Government set benchmark land values?*

As low as these can be set whilst still encouraging landowners to bring forward land for development. This may require further research to identify an appropriate level.

Question 39: *To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?*

Yes, developers being aware that actual land costs paid will not allow a viability review will help to manage landowners' expectations.

Question 40: *It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?*

Yes, expectations of levels of affordable housing above 50% are unlikely to be realistic.

Question 41: *Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?*

Yes, this is an approach NNDC already uses where possible through inclusion of uplift clauses in s106 agreements. However, it is unlikely this approach will deliver more on-site affordable housing but could deliver commuted sums to help delivery elsewhere.

Where a developer/applicant has properly evidenced a viability case to support financial or non-financial contributions below policy requirements it is right that the development should be subject to further viability review if that development has not commenced or completed to an agreed point. In most cases, a viability re-appraisal should not be required if the proposal is a single-phase development which is completed within five years of the grant of permission. For multi-phased development or schemes which take longer than five years to complete post grant of permission, viability review(s) should be required (secured via S106 Obligation).

Much time and effort is expended in reviewing viability reports. Local Planning Authorities could be supported in this task through very clear and fair rules on Assessing viability in planning under the National Planning Policy Framework. Current RICS guidance stacks the cards firmly in the favour of developers with guaranteed returns of 20% for developers which is not always reflective of the risks involved for the developer. Local Communities miss out through developers being able to argue non-viability allowing for reduced contributions which would ordinarily be needed to make developments acceptable in planning terms.

For too long viability assessments have been shrouded in secrecy and the current rules result in crushing the ambition of all authorities converting consents into completions. They also appear to too easily 'defeat' planning policies locally and undermine the planning department's function to be plan led not developer led. As well as reforming the rules it should be a requirement to publish any Assessments conclusions in a standardised format to improve the transparency of the process.

Question 43: *Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?*

Questions 37 – 46 specifically apply to Green Belt land to be released. However, there are arguably elements from these proposals that could be applied to ALL development in order to increase the level of affordable homes delivered and ensure other s106 requirements are met. In particular the proposal to set a national Benchmark Land Value (BLV) to try to manage landowners' expectations of land value and ensure high land prices do not impact on viability and the ability to deliver public benefits from development.

This is similar to the current approach to Rural Exception Schemes, where land values are kept low (as this is land that would not normally be expected to be brought forward for development) enabling higher levels of affordable housing to be delivered. The proposals suggest setting BLV at a multiple of existing land use value of agricultural land (typically £20-25k per hectare). The multipliers considered might be as low as 3x up to 10x (whereas BLV used now tend to vary between 10x - 40x existing use values). The proposals also include use of 'late' viability reviews, once more accurate real costs and income figures are known (rather than using industry standard assumptions ahead of known figures). This is akin to the approach NNDC take with uplift clauses in s106 agreements, where a review of viability is required during development or at the end of development which uses real figures. Dependent on timing of a 'late' viability review this could lead to additional financial contributions (in lieu of on-site delivery of affordable homes) but is unlikely to enable on-site delivery once development has commenced.

Question 46: *Do you have any other suggestions relating to the proposals in this chapter?*

See answer to question 43

Chapter 6 - Delivering affordable, well-designed homes and places

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes, it is important to reflect local circumstances. However, it needs to be recognised that as Social Rented is usually lower than Affordable Rent these homes will attract lower prices from Registered Providers and therefore will be less viable than other forms of affordable housing, which may mean inclusion of Social Rent homes reduces the overall level of affordable homes possible from a development.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes, it is important to reflect local circumstances. The vast majority of households in housing need and on the Council's housing list would not be able to afford any form of affordable home ownership and require homes to rent. Affordable home ownership may be acceptable in lower cost parts of the district, so the Council should be able to reflect this in flexible local policies.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Yes, First Homes is not an affordable option in high value/low wage areas such as North Norfolk. Our preference for affordable home ownership would be shared ownership which offers a more affordable route to owning.

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

This should be a local decision reflecting local housing need. As stated above, in our district we do not believe this is a genuinely affordable option and causes confusion with Rural Exception Schemes, which First Homes were already excluded from.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes, this is an approach already supported and we are particularly keen to see new private rented homes in the district which are badly needed.

Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

In addition to Rural Exception Schemes which must be predominantly affordable homes, this could be achieved through specific allocations of sites for affordable homes in a local plan.

Question 53: *What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?*

This is an approach NNDC has supported, although this has been on relatively small sites (under 50 homes) in towns or larger villages, and developments have included a reasonable proportion of shared ownership homes. An element of sensitive or local lettings plan has often also been used when allocating homes.

Question 54: *What measures should we consider to better support and increase rural affordable housing?*

NNDC has been successful in delivering a number of Rural Exception Sites, but these are time consuming and expensive for Registered Providers to deliver. Higher grant rates are required to deliver quality developments that reflect the rural communities in which they are built. Developments often face local opposition from communities who were not expecting any new homes, so better national information about these sites would be helpful.

Question 56: *Do you agree with these changes?*

Yes, NNDC fully supports community-led housing and recognises that housing proposals may emerge from community groups or charities that were originally set up for different purposes (e.g. neighbourhood planning). There should be no arbitrary size limit on community-led exception schemes (or any other form of exception site) as these should reflect the nature and wishes of local communities.

Question 57: *Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?*

The Council would like to see the definition of an Affordable Homes moved away from relating to market price / rent levels towards a system linked to average local incomes. The mortgage lending ratio should be no greater than three times local incomes and rents limited to 35% of average local household incomes.

This is a relevant issue for NNDC as we have had interest from a number of landowners who have an interest in developing affordable homes for local people (e.g. country estates or farmers who already let homes). We are interested in introducing some flexibility to encourage these types of developments but would need to ensure there were safeguards so that homes remained affordable in perpetuity and some ‘regulation’ of these took place so, for example, rents were set and retained at an affordable level. Perhaps there is a lesser regulatory role for Homes England in this?

Question 58: *Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?*

Factors that impact on this could include:

- Complex planning processes: may favour larger developments due to economies of scale
- landowner reluctance to sell smaller sites due to lower financial returns
- some small sites are likely to come forward as windfall and contribute to housing supply in that way

Measures to consider - simplify and speed up the planning process for small sites; incentivise landowners, LPA identification of and support for and promotion of suitable small sites

Chapter 8 – Delivering community needs

Question 68: *Do you agree with the changes proposed to paragraph 99 of the existing NPPF?*

Whilst the proposals for placing “Significant weight” in decision making for new, expanded or upgraded public service infrastructure is welcomed, some caution is advised where residential development is required to make S106 contributions towards public infrastructure. Requests for financial contributions from an education authority or health authority should be based on clear and justified evidence otherwise excessive demands will place at risk the delivery of much needed housing growth.

Question 69: *Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?*

The introduction of the phrase “In all tested scenarios” raises the question of what is actually meant by “in all tested scenarios” and who will be the person undertaking the tests – applicant or highway authority or Local planning authority? Would suggest this be amended to say “in all reasonable tested scenarios” otherwise Local Planning Authorities will be held up in determining applications if there is unjustified highway objection from local residents on the basis that not every test scenario has been undertaken.

Chapter 9 – Supporting green energy and the environment

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

It depends on the definition of 'large'.

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

The Council supports the proposed changes - these should be aligned with the production and adoption of local area energy plans.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Additional protections should be put in place for certain environments. However, if technological solutions are available or become available that allow some habitats to co-exist with renewable generation then this may be a way to safeguard these environments for the future. National planning policy should be supportive of such solutions.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

The Council would prefer to see proposals in its area determined locally – whilst recognising that the Government could provide capacity support for complicated / specialist cases.

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

The Council would prefer to see proposals in its area determined locally – whilst recognising that the Government could provide capacity support for complicated / specialist cases.

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Consideration should be given to the recommendations contained in the Spatial Planning for Climate Resilience & Net Zero report for the Climate Change Committee 2023.

For example

- Include explicit requirements for carbon accounting of local plans and demonstrating emissions reductions in line with the Climate Change Act and national Carbon Budgets.

- Set out explicit requirements and expectations for local plans to achieve specific climate adaptation targets and transition to a net zero future.
- Include reference to reducing carbon emissions and supporting climate adaptation in the definitions of the test of soundness and sustainable development.
- Be clear that national policy and standards on climate change are a minimum baseline and enable local authorities to set more ambitious targets where this is justified.
- Reform the viability process so that net zero becomes a baseline requirement when determining the viability of a plan or project.
- The government should disaggregate the national carbon budget to local authority scale, providing local planning authorities with the evidence and methodology through which compliance of plans and proposals can be measured.
- Local plans and decision making should be tested against a holistic framework of adaptation and resilience measures, incorporated into the NPPF, with clear parameters set within the PPG so that performance can be measured against defined targets.
- Stronger Planning Practice Guidance to support local authorities with plan making for climate adaptation and mitigation
- Embed policy support and enablers for retrofit into the NPPF and permitted development rights (e.g. future proofing homes for boiler replacement, energy efficiency, clearer guidance for historic buildings).

In addition, Government should consider

- imposing immediate requirements for net zero housing and improved water efficiency now – do not allow the building of anymore homes that will require retrofit at a later date
- giving local authorities powers to insist on certain types of technologies (and ban others) in new and existing buildings in certain areas
- strengthening the power of S106 agreements so that Net Zero and other climate actions e.g. tree planting/green spaces cannot be removed at a later stage
- strengthening protection for special areas e.g. Natural Landscape areas, prohibiting practices which will add to the climate problems but allowing them to take part in the solution
- limiting the development in coastal areas to developments that help mitigate climate change or provide temporary solutions but do not exacerbate issues (e.g. do not allow the provision of housing that needs to be relocated at a later date)
- making regulations regarding listed buildings more flexible to allow for retrofit/decarbonisation.

As part of making housing more affordable, all new properties should be designed and constructed to 'net zero' standards if we are to stand a chance of being carbon neutral by the 2030 target. The Council believes that this could probably be controlled more effectively by the 'Building Regulations' system than the planning system.

We would welcome a review of permitted development rights with a view to including most air source heat pump proposals within permitted rights.

Question 79: *What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?*

LPAs lack the evidence, technology, capacity, knowledge and skills to carry out carbon accounting for local plans. National planning policy and guidance should address the major challenge of a current lack of standardised methods and guidelines for carbon accounting.

Question 80: *Are any changes needed to policy for managing flood risk to improve its effectiveness?*

Policies should account for all sources of flood risk, including rivers, sea, surface water, groundwater, and overwhelmed drainage systems.

Policy should strengthen the application of the sequential and exception tests to ensure that new developments are directed away from high-risk areas unless absolutely necessary.

Question 81: *Do you have any other comments on actions that can be taken through planning to address climate change?*

The Council has declared a Climate Emergency and pledged to assist the wider district to achieve Net Zero by 2045. Net Zero therefore needs to be at the heart of planning requirements with an obligation for future developments to be part of the solution.

Chapter 10 – Changes to local plan intervention criteria

Question 87: *Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?*

It should be recognised that the progression of a Local Plan is heavily dependent on resources, notably the availability of professional planning officers, it would be beneficial for local authorities to receive additional ring fenced funding to better facilitate the plan making process.

If subject to an intervention consideration, it would be beneficial for a local authority to have the physical constraints of the area and other local evidence taken into account.

Question 88: *Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?*

Providing criteria may provide more clarity as to when there would be risk of intervention and may ensure better consistency in the process.

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

Question 89: *Do you agree with the proposal to increase householder application fees to meet cost recovery?*

Yes.

Question 92: *Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.*

Most but particularly, applications under Regulation 77 of the Habitats Regulations – current fee is £30 which is considered inadequate. The majority of development allowed under the General Permitted Development Order (GPDO 2015) as amended, places a requirement on applicants to confirm with Councils whether a proposal will have an adverse impact on European sites. In the past this was less problematic and applications were small in number. However, the GPDO now encompasses such a large number of scenarios of permitted development creating new overnight accommodation and camping and caravan sites (including through potential abuse of Natural England's "Exemption Scheme") more and more Regulation 77 applications are required to be submitted. With such issues as recreational impacts on European sites requiring tariff payments and the issue of nutrient neutrality requiring evidence of neutrality or the securing of mitigation, these complex Reg 77 applications require input from a range of expertise, including by ecology officers assessing proposals and producing Habitats Regulations Assessments before Natural England will comment. Estimated costs to Council for Reg 77s can range from circa £125 to upwards of £540.

Question 94: *Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?*

Please give your reasons in the text box below.

The Council would prefer to continue with a system of nationally set fees. However, the Council believes the overall ambition should be to enable 'Development Management' services to be cost neutral and we are a long way from that at the moment so a series of above inflation fee increases may be required to get to 'cost neutral'. In principle, it seems only right that those that make applications should bear the cost of the service rather than the general council tax payers.

Question 95: *What would be your preferred model for localisation of planning fees?*

Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.

Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Neither

Don't Know

Please give your reasons in the text box below.

In terms of the consultation - of the two options put forward – outright control or government setting with limited ability to vary - we prefer the latter (with index linked increases as part of the system). Total responsibility for setting fees would be a burden but partial ability may help with staff recruitment and retention.

Question 96: *Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?*

If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?

Yes – to cover some enforcement costs.

Question 97: *What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?*

As well as some enforcement other specialist inputs required by the local planning authority to enable it to process applications e.g. Conservation, Design, Environment Health and Landscape input.

Question 98: *Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?*

Yes

Question 99: *If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.*

Local Planning Authorities (including all specialist officers inputting into NSIP schemes) involved NSIP applications from early stages of consideration, PEIR, examination, Requirements discharge of DCO etc. Involvement in NSIP schemes can be complex and time consuming especially given the volume of documents to consider and assess.

Question 100: *What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?*

Applicants will understandably want clarity as to the scope and extent of fees that they are likely to be subject to.

Question 101: *Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.*

Recovery of costs for Local Planning Authorities means that time/cost spent on NSIP schemes can be recovered to a significant extent and, if timing is understood, recovered costs can be used to cover other work affected through involvement in NSIPs. The biggest challenge is recording the time spent on NSIPs. LPAs are not great at accurately billing for their time and the creation of some tools for LPAs to use would be very helpful so as to avoid duplication of resources.

Chapter 12 – The future of planning policy and plan making

Question 103: *Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?*

Transitional arrangements are welcomed and necessary to allow for the continuation of well-progressed local plans, as forcing a restart would result in further delays to sustainable housing development and place additional strain on limited resources.

The different arrangements based on stages of plan making already reached might cause confusion and inconsistency in execution.

However, the 200 dwelling threshold is considered too rigid / strict / small. A higher threshold would be more appropriate, particularly for those plans that are at the latter stages of examination. Having to begin preparation of another plan so quickly could harm / reduce public confidence in the plan making system.

Consideration should be given to adjusting the threshold based on local context and housing market signals. Introducing some flexibility may help accommodate varying areas needs and reduce administrative burden.

Question 104: Do you agree with the proposed transitional arrangements?

The different arrangements based on stages of plan making already reached or not reached might cause confusion and inconsistency in execution. In particular it will be difficult for non-planners and members of the public to understand what is being expected of their local planning authority.

Question 105: Do you have any other suggestions relating to the proposals in this chapter?

Provision of additional support and resources to local authorities to assist in meeting the proposed new requirements could ease the transition and ensure more effective implementation.

We are very concerned about a number of omissions from this consultation such as abolishing street referenda in the LURA, no guidance on the standard use of artificial intelligence, criteria for preventing viability challenges to release more brownfield sites, measures to prevent land banking and compulsory purchase reforms, use of s106 funds by registered providers to enable council house building, longer term funding statements from Homes England, absence of any clarity on nutrient neutrality challenges to 5 year land supply, support for transport and other infrastructure to enable rural sustainable development or finally much about the future delivery of permitted development rights to ensure development is of required quality and maintenance. All in all, we are not optimistic that the new Planning and Infrastructure Bill in the next parliamentary session will deliver the radical changes to planning policy so badly needed.

Chapter 13 – Public Sector Equality Duty

Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

The Council is concerned about the potential increased administrative burden and the need for additional resources to implement the changes effectively.

[End]

This page is intentionally left blank