

Planning Policy & Built Heritage Working Party



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Friday, 6 March 2020

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the Council Chamber - Council Offices, Holt Road, Cromer, NR27 9EN on **Monday, 16 March 2020 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 Democratic Services & Governance Officer 24 hours in advance of the meeting and provide a copy of the question or statement. Statements should not exceed three minutes. Further information on the procedure for public speaking can be obtained [here](#) or from Democratic Services, Tel: 01263 516010, Email: democraticservices@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

Emma Denny
Democratic Services Manager

To: Mr A Brown, Mrs P Grove-Jones, Mr T Adams, Mr D Baker, Mr N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr N Pearce, Mr J Punchard and Dr C Stockton

Substitutes: Mrs A Fitch-Tillett, Mrs W Fredericks and Mr A Varley

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



If you have any special requirements in order to attend this meeting, please let us know in advance

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

(Pages 1 - 8)

To approve as a correct record the Minutes of a meeting of the Working Party held on 10 February 2020.

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

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.

6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

7. SMALL GROWTH VILLAGES AND POLICY APPROACHES TO GROWTH IN RURAL AREAS (Pages 9 - 52)

Summary: To identify the final suite of Small Growth Villages that policy SD3 applies to and to establish the overarching approach to the identification and delivery of the apportioned growth in Small Growth Villages, including the ratification of the approach through a suite of policies that deliver flexible and exception growth in the rural areas.

Recommendations:

- 1. It is recommended that members endorse the changes to the list of Small Growth Villages.**
- 2. It is recommended that members endorse the revised approach and delegate responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Options: There are three options available for consideration:

Option 1: Members endorse the revised approach;

Option 2: Members do not endorse

the revised approach;
Option 3: Members provide support
for the revised approach
and provide further
direction.

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Iain Withington Planning Policy team leader (Acting Policy Manager) 01263 516034, Iain.Withington@north-norfolk.gov.uk</p> <p>Caroline Dodden – Senior Policy officer 01263 516310 Caroline.Dodden@north-norfolk.gov.uk</p>	

8. ANY OTHER BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

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.”

10. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA

11. ANY OTHER URGENT EXEMPT BUSINESS AT THE DISCRETION OF THE CHAIRMAN AND AS PREVIOUSLY DETERMINED UNDER ITEM 4 ABOVE

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PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 10 February 2020 at the Council Chamber - Council Offices, Holt Road, Cromer, NR27 9EN at 10.00 am

Committee

Members Present:

Mr A Brown (Chairman)	Mrs P Grove-Jones (Vice-Chairman)
Mr T Adams	Mr P Fisher
Ms V Gay	Mr P Heinrich
Mr J Punchard	

Members also attending:

Mrs W Fredericks
Miss L Shires

Officers in Attendance:

Mr I Withington – Planning Policy Team Leader (Acting Policy Manager)
Mr R Dholiwar – Planning Monitoring Officer
Mr S Harrison – Senior Planning Officer
Miss L Yarham – Democratic Services & Governance Officer

37 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors N Dixon and N Pearce. There were no substitute Members in attendance.

38 PUBLIC QUESTIONS

Mr Berni Marfleet asked a question relating to the North Walsham Western Extension: Draft Vision Statement and Communications & Engagement.

Mr Marfleet stated that he represented Save Our Streets North Walsham, which was pleased to see that the issues they had been promoting had been taken up in the Consultation Draft, relating to objective 3 regarding the link road crossing the railway line into the industrial estate, a green corridor and traffic restraint on Aylsham Road and Skeyton Road. He commented that the latter needed to be extended to include Skeyton New Road.

Mr Marfleet asked if there was a commitment to include the link road in the Deposit Plan and how it related to the highway infrastructure study, and the timing and financial viability of achieving it within the plan period.

The Planning Policy Team Leader responded that the Working Party had asked Officers to consider the feasibility of connecting the link road over the railway bridge. This was part of the workstream for the North Walsham Development Brief. The Local Plan would go to examination at the end of the process, which would look at whether the legal processes and procedures had been followed, and the soundness of the Plan. Soundness included an element of delivery so it was incumbent on the Council to provide a reasonable delivery strategy for all the proposals contained in the Plan. The highway study was part of the processes and evidence base and would consider the feasibility and possible options for the link road. This would feed

into the Working Party for future discussion.

The Senior Planning Officer stated that he would cover matters relating to the Western Extension and link road in his report later in the meeting.

Mr Marfleet asked whether the transport assessment would be included in the Deposit Plan or if the assessment took longer, whether the Plan would be delayed or go forward without the full transport assessment having been completed.

The Senior Planning Officer replied that the timeline for the Local Plan was under review and there was a need to establish the components of the plan. The highway study would feed into the policies and was not expected until early summer. The Senior Planning Officer's report would cover this matter later in the meeting.

39 MINUTES

The Minutes of a meeting of the Working Party held on 9 December 2019 were approved as a correct record and signed by the Chairman.

Councillor Ms V Gay stated that the Planning Policy Manager had provided a full set of consultation responses following the meeting and wished to place on record her thanks to him. She had now finished with the document and would place it in the Members' Room.

40 ITEMS OF URGENT BUSINESS

None.

41 DECLARATIONS OF INTEREST

None.

42 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

The Chairman referred to the resolution under Minute 34 of the previous meeting which requested him to write to the Highway Authority to express the Working Party's dismay and growing frustration at its lack of co-operation in the Regulation 18 consultation.

The Planning Policy Team Leader explained that, with the agreement of the Chairman, a letter had not been sent as the Highway Authority's full response had been received shortly after the meeting. Subsequent meetings had been held with the Highway Authority to clarify outstanding matters and the Working Party's concerns had been raised informally with them.

The Chairman stated that any Member who wanted a paper copy of the summary of Regulation 18 consultation responses could request one.

43 PLANNING POLICY - MONITORING REPORT 2018-19

The Planning Monitoring Officer presented a report giving an overview of the main development trends in the District in the period 2018-2019 and which measured performance against adopted Core Strategy policy and corporate objectives.

The Planning Monitoring Officer presented the key findings in the Annual Monitoring

Report (AMR) with regard to dwelling completions. He stated that the number of planning permissions had dropped in the current year, which had repercussions for delivery. The projection for 2020/21 was higher but this was not guaranteed and it could drop significantly depending on the number of permissions granted during the year. He referred to the breakdown of dwelling types and stated that the majority of dwellings were 2 and 3 bedroomed properties. It was intended to adopt the national space standards in the emerging Local Plan. It was evident that some of the major developments did not fully comply with the standards and it had to be considered if some of the 3-bed dwellings were effectively 2-bed with a 'boxroom'.

The Planning Monitoring Officer presented the findings in relation to population change, which indicated an ageing population in North Norfolk.

The Planning Monitoring Officer explained that the AMR would inform the new Local Plan and once the new plan was adopted, he would monitor how well the Authority was performing against it.

Councillor Mrs P Grove-Jones commented that granting planning permission did not necessarily mean that completions would increase. There was a need to take into account the rate of economic growth, which impacted on delivery.

The Planning Monitoring Officer explained that granting planning permission enabled development to take place. Without planning permission there was no mechanism for delivery.

Councillor Mrs Grove-Jones asked if space standards were mandatory, and if there were standards for external space.

The Planning Policy Team Leader explained that the Working Party had previously considered a background paper on space standards. There would be a policy requirement in the new Local Plan for dwellings to be built to nationally prescribed space standards. These standards were not included in the current Local Plan and developers were not at present obliged to meet them. There were no space standards related to external space.

The Chairman asked if neighbourhood plans would be required to mirror the space standards once they were adopted.

The Planning Policy Team Leader explained that neighbourhood plans had to be in general conformity with the Local Plan and they could not set different standards.

Councillor Ms V Gay asked how the indicators were set and if they had been agreed by the Working Party.

The Planning Policy Team Leader explained that the indicators were set within the Core Strategy in 2008. They were likely to have been considered by the Working Party and would have gone through the examination process. The success of the indicators had varied over time.

Councillor Ms Gay referred to the requirement in the current Plan to ensure 40% of new dwellings had 2 bedrooms or less. However, the cases of real need that had come to her attention required 3 bedroomed accommodation.

The Planning Policy Team Leader stated that current evidence in the Strategic Housing Market Assessment clearly identified a demand for 2 and 3 bed properties.

As such, policy HOU2 in the emerging plan states that not less than 50% of properties on schemes of 6 or more dwellings should be 2 or 3 bedrooms. He explained that the Housing Team were consulted on planning applications for advice as to the breakdown of appropriate dwelling sizes for particular locations in relation to need on the Council's waiting list.

Councillor Mrs Grove-Jones asked what the house builders preferred to build in terms of bedroom space.

The Planning Policy Team Leader explained that the majority of dwellings built across the District as a whole were 3-bed, but in some locations there was a tendency for developers to push for larger, more expensive properties. Emerging policies were designed to give more control to address the actual need.

Councillor Mrs Grove-Jones referred to the demographic profile which pointed to a decreasing need for large properties and an increasing need for smaller dwellings as the population aged. She considered that it would be interesting to see if developers were interested in developing in the area if they had to build smaller dwellings.

The Chairman considered that 10% of permissions which did not proceed to build out was quite a high figure. He asked if this was analysed to see if developers were land banking.

The Planning Monitoring Officer explained that permissions which did not proceed were generally single plots. There could be a number of reasons why developments did not proceed. Larger schemes were usually built out but they often took a number of years to complete.

Councillor P Heinrich asked how the Council could ensure that dwellings were accessible to meet the needs of older people.

The Planning Policy Team Leader explained that the emerging plan required future dwellings to be constructed so that they could be easily adapted to the needs of the occupiers throughout their lives. Policy HOU8 required the applicant to demonstrate through the design and access statement as to how the standards could be achieved. Compliance would be monitored by Building Control.

Councillor Heinrich expressed concern that younger people with skills would be driven away from the area due to a lack of suitable employment opportunities. He asked if Officers were confident that there was sufficient employment land which was suitable for technology industries and the economic drive to encourage that type of employment.

The Planning Policy Team Leader stated that the emerging Local Plan would contain policies to designate employment land. An employment growth study had been commissioned which would review the employment sites and assess whether the sites were of sufficient quality. This would come back to the Working Party in due course. He referred to Table 3.9 of the AMR which gave a breakdown of employment within the District, and in particular, referred to the percentage of part time and full time jobs in comparison with the national average and the low number of professional, scientific and technical jobs. Planning policy would help facilitate growth and enable sufficient land to be taken up, and it was necessary to provide land in the right places.

Councillor Mrs Grove-Jones referred to the demographic of the District and

considered that the increase in the proportion of older people would generate more self-employment to provide services to them. Self-employed people did not necessarily require employment land but they would need garaging etc. which did not appear to be covered to any extent. She suggested that if there was a rise in self-employment, it would also link to a growth in apprenticeships for building trades etc.

The Planning Policy Team Leader stated that the number of self-employed people in the District was already higher than the national average.

Councillor Miss L Shires commented that the employment statistics did not show the percentage of jobs which were not filled due to the housing situation. She referred to the difficulties in recruiting to lower paid jobs, particularly in healthcare and mental health services, as low cost housing was not affordable to people on low wages.

The Planning Policy Team Leader stated that recruitment difficulties fell outside the remit of planning policy as the AMR only monitored planning statistics. He added that it was influenced by a number of factors such as remoteness and accessibility, in addition to housing issues, and was a County-wide issue.

The Chairman considered that the situation had not been helped by an ONS report which stated that earnings were £2-2.5k lower in coastal areas. The demand for second homes, combined with lower incomes, caused great difficulty in those areas in terms of affordability, with house prices being around 10 times average incomes.

The Planning Policy Team Leader referred to the affordability statistics in the AMR, which indicated that the house prices to wages gap was widening. He stated that the Economic Development Team had commissioned new baseline evidence to inform emerging employment strategies. It would also look at existing baseline employment and the amount of land available for employment. The study would be brought to the Working Party in due course and he would investigate the unemployment rate.

Councillor Mrs W Fredericks commented that people working in the healthcare, mental health and also tourism sectors could not get mortgages due to zero hours and seasonal contracts. Whilst affordable housing was welcomed, such people could not access it unless it was socially rented.

The Chairman considered that “affordable housing” was a misnomer as it was still out of reach of people in the main employment sectors in North Norfolk. Mortgage affordability was based on incomes in the financial and professional sectors which were not representative of the District.

Councillor T Adams referred to the significant drop in the number of homes built on brownfield land since 2017/18 in comparison with the Council’s targets. He considered that the likely reason was a lack of brownfield land and asked if it was now appropriate to reconsider the targets in the light of the data.

The Planning Monitoring Officer stated that the supply of brownfield land was diminishing. The rural area of North Norfolk was very different from Norwich, where there was former industrial or other previously developed land to build on.

The Planning Policy Team Leader explained that the target in the AMR was derived from the Core Strategy and that a new monitoring framework would be developed as part of the emerging Local Plan based around its policies. Such a framework would

be part of future discussions and was required as part of the examination process.

Councillor P Heinrich stated that there was a trend for private landlords to advertise their properties on Airbnb instead of letting them to permanent tenants, and asked if there was any data as to how many had been taken off the market for this reason.

The Planning Monitoring Officer stated that the only way this could be monitored was to search through Airbnb which would be very time consuming. Consideration had to be given as to what was monitored and how the data could be used.

The Chairman stated that some authorities had monitored Airbnb in terms of refuse licences, business rates etc.

The Chairman thanked the Planning Monitoring Officer for the work that he had done to produce a very thorough report.

44 NORTH WALSHAM WESTERN EXTENSION: DRAFT VISION STATEMENT AND COMMUNICATIONS & ENGAGEMENT

The Senior Planning Officer presented a report which gave an outline of the communications and engagement approach and the draft Vision for the North Walsham Western Extension. He explained that all options for HGV access were being explored, with access over the railway line via a northern or eastern route, and he anticipated that the best option would be determined on the basis of feasibility, viability and the cost of infrastructure provision. The results of the evidence study were likely to be delayed until August as gas works were being undertaken in the town and it was necessary to conduct the survey in normal traffic conditions. Work on the Brief would be progressed as quickly as possible and the Delivery Group would meet again once the first phase of the highway evidence work had been completed and discussions could begin to take place on emerging issues.

Councillor Ms V Gay requested that the Vision be strengthened to refer to *highest* design quality (core theme 5), *highest* environmental standards (core theme 1) and social, community and *green* infrastructure (core theme 4). She considered that a dedicated webpage would be a good idea.

Councillor P Heinrich endorsed Councillor Gay's suggestions. He stated that he was very pleased with the Vision and supported the idea of three village-style developments which would allow for green corridors. He requested more detail regarding an eastern link from Yarmouth Road.

The Senior Planning Officer explained that an eastern route had been considered in the past and there was a question of feasibility and the need to explore all options. HGV movements in the town were impacted by three low bridges, the highest being on Aylsham Road which forced HGV traffic in that direction. Initially it was necessary to understand the number and nature of HGV movements, the impact on the town and where they went, and then to consider how any significant issues could be addressed. The northern route would require consideration of the suitability of the existing bridge for the volume of traffic and the measures that could be put in place to address any issues, including widening, raising or replacing the bridge. There was a prospect of a possible eastern route from Norwich Road round to Yarmouth Road over the railway, which would require a large amount of land and infrastructure. The consultants would carry out high level feasibility work on the costings of these options and other mitigation measures in the town.

Councillor Heinrich supported Mr Marfleet's comment that Skeyton New Road should be included as it tended to be a rat run, with HGVs using very narrow lanes.

Councillor Mrs P Grove-Jones asked if the Highway Authority supported the vision.

The Senior Planning Officer explained that Highway Authority representatives were included in the discussions as they could provide expert technical advice. The Highway Authority had issued a holding objection regarding the feasibility of delivery from a highway point of view and the vision statement would go some way to resolving that objection.

Regarding design and green infrastructure issues, the Senior Planning Officer stated that there would be a section in the development brief to deal with design, and a green infrastructure strategy would be considered in the coming months.

Councillor Mrs Grove-Jones stated that people who did not live in North Walsham had the impression that the town was split by the railway line and she considered that small community buses could be run regularly from the new estates into the shopping area.

The Chairman asked when the communications and engagement statement would be available and when local Members would be involved.

The Senior Planning Officer explained that the basic principles would be considered at officer level, and would then be brought to the delivery group and local Members to decide who and how to consult before bringing the statement to the Working Party for approval. It was necessary to communicate to people as soon as possible as to how the Council would engage with them.

Councillor Heinrich asked if businesses were being consulted on the industrial estate and elsewhere in the town. He stated that Drury's in particular had a major interest in transport issues.

The Senior Planning Officer stated that an economic study had been commissioned specifically to consider the issues with the industrial estate and how to bring forward new industrial land. The need to speak to people with a stake in the link road was recognised.

It was proposed by Councillor A Brown, seconded by Councillor P Heinrich and

RESOLVED unanimously

- 1. That the Draft Vision for the Western Extension be approved subject to amendments to strengthen the Vision in terms of design, environmental standards and green infrastructure and inclusion of Skeyton New Road.**
- 2. That the update on the approach to communications and engagement be noted.**

The meeting ended at 11.35 am.

Chairman

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Small Growth Villages and Policy Approaches to Growth in Rural Areas

Summary: To identify the final suite of Small Growth Villages that policy SD3 applies to and to establish the overarching approach to the identification and delivery of the apportioned growth in Small Growth Villages, including the ratification of the approach through a suite of policies that deliver flexible and exception growth in the rural areas.

- Recommendations:**
- 1. It is recommended that members endorse the changes to the list of Small Growth Villages.**
 - 2. It is recommended that members endorse the revised approach and delegate responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Options: There are three options available for consideration:

Option 1: Members endorse the revised approach;

Option 2: Members do not endorse the revised approach;

Option 3: Members provide support for the revised approach and provide further direction.

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Iain Withington Planning Policy team leader (Acting Policy Manager) 01263 516034, Iain.Withington@north-norfolk.gov.uk</p> <p>Caroline Dodden – Senior Policy officer 01263 516310 Caroline.Dodden@north-norfolk.gov.uk</p>	

1. Introduction

- 1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced which will determine if the Draft Plan is

sound, with or without further modifications, following which the Plan can be formally adopted by the Council.

- 1.2 This report focusses on the broad distribution of growth in relation to rural development and discusses the options available and recommends modifications to the Draft Plan for inclusion in the submission version.
- 1.3 **The purpose** of this report is following consultation to identify the final suite of Small Growth Villages that policy SD3 applies to and to establish the overarching approach to the identification and delivery of the apportioned growth in Small Growth Villages, including the ratification of the approach through a suite of policies that deliver flexible and exception growth in the rural areas.

2. Background and update

- 2.1 Our towns and villages that provide an appropriate level of services are central to our strategy. It is their role and function, not simply their size that determines the appropriate level of development to be planned for.
- 2.2 In order to maintain and enhance these places the Plan takes an approach to growth that encourages jobs and homes, where they best deliver our strategic priorities and allows for more organic development where it supports or enables the provision of appropriate services and facilities locally. Thus delivering on sustainable development principles. The location of development is one of the fundamental determinants of sustainability and has impacts on many of the environmental, economic and social dimensions of land use planning. It is also inextricably linked to **climate change** and how through the Plan the Council can incorporate measures that mitigate and adapt to its effects.
- 2.3 Specific housing targets and allocations are provided for in the Large Growth Towns, Small Growth Towns and the four identified Growth Villages in policy HOU1, which reflects their role and function. Sites have been identified that are well related to these towns in order to meet the proposed targets. In addition to the planned growth, provision for additional growth is made through policy SD2 for communities to identify and bring forward additional housing sites at suitable locations and scale in accordance with the strategic policies of the Plan. Additional growth can also be brought forward through neighbourhood planning and through a number of policies that relate to this issue in the Plan.
- 2.4 Policy SD3 identified and consulted on a number of settlements as Small Growth Villages. Such settlements do not meet the level of service provision of higher order settlements but nevertheless, were identified as providing a limited level of services that act as basic service hubs and daily needs for nearby villages and, as such, contribute to the vitality of the rural district. The detailed approach in their identification was published in Background Paper 2 which accompanied the earlier consultation documents.
- 2.5 Policy HOU1 made provision for 400 dwellings to be provided from Small Growth Villages in the development hierarchy over the Plan period, through the identification of suitable sites /approach in a part 2 Plan prior to publication.
- 2.6 Outside the settlement hierarchy and as set out in policy HOU1 the delivery of the housing requirement also relies on an annual requirement of approx. 135 dwellings through windfall means¹. The reliance on windfall will diminish through plan

¹ 2,160 (minimum) across the remainder of the plan period (2020-2036)

preparation as permission is granted and will be taken into account in the update of policy HOU1.

2.7 Although elements of such an approach can be considered as diminishing returns, historically the District has delivered a consistent amount and the emerging approach is viewed as conservative and realistic. Such a windfall amount can come through a variety of policy means, each designed to allow a flexible and pragmatic approach to the delivery of growth in a manner that reflects the District and that accords with the NPPF as listed below;

- 1 Development in the Countryside, policy SD4, sets out the strategic approach and overriding principle in areas outside settlements with development boundaries. Residential development is limited to that appropriate to: agricultural/ forestry use, affordable homes, replacement dwellings, subdivision of dwellings, key worker's accommodation and that for gypsies and travellers, community led development, and specialist accommodation for the elderly and others requiring care, where there is a demonstrable need.
2. Policy SD2 sets out a flexible criteria based policy approach that is supportive of residential community led development which may not comply with some aspects of the Plan, but provided that it is supported by the community and it can be demonstrated that the proposal is needed and will make a meaningful contribution to the vitality of the community and addresses local needs. The approach is not limited to residential development but also includes support for small business units where it is demonstrated that the proposal will contribute positively to the community as a whole. The mechanism for delivery is through legitimate community groups such as parish council's and community land trusts.
3. Affordable Homes in the Countryside, (Rural exception Sites) policy **HOU3**, - based on identified local need, sites and proposals can be brought forward to meet that need in any settlement in the settlement hierarchy and "countryside" locations. Such sites would be subjected to occupancy restrictions which limit occupation to the parish and adjacent parish in line with housing allocation policies of the council and is the means of providing local homes for local people. 68 rural exceptions homes have been completed over the last three years with a further 15 expected to be completed² in this financial year bringing the three year total to 83 dwellings.
4. Provision & Retention of Local facilities and services policy SD6, contains the provision for residential development to support the provision of, retention and enhancement of healthcare facilities including specialist accommodation on Health and Social Care campuses.
5. Coastal Adaptation, policy SD12 contains the policy framework that allows for replacement dwellings affected by erosion to be permitted outside the Coastal Change Management Area, provided that they are closely related to the coastal community from which it is being displaced.
6. Agricultural and Other Key worker Accommodation, policy HOU4, sets out criteria to facilitate development for agricultural, forestry and other essential workers, in the countryside policy area.
7. Policy HOU5 sets out criteria to facilitate appropriate scale and nature of accommodation for Gypsy, Travellers accommodation.

² 3 Binham, 12 Edgefield

8. A number of the policies in relation to employment, tourism and retailing include location controls, although they can contribute to residential growth they are not considered to be directly focused on the broad distribution of residential growth. These policies along with site-specific policies will be brought back for consideration in later reports.

2.8 In addition to the Local Plan,

- Secondary legislation contained within the General Permitted Development Order 2015 (as amended) contains permitted development rights that also increase the number of homes delivered through changes of use. The permitted change of use and prior notification mechanisms enable a range of existing office, commercial and agricultural buildings to be converted to residential accommodation.
- Any positively prepared neighbourhood plan, subsequently will also contribute to windfall growth through the identification of additional growth sites in relation to the evidence of local needs. To date the only neighbourhood plan that has (or is proposing) identified growth locations is Corpusty & Saxthorpe. The Local Plan though does not rely on this or any other Neighbourhood Plan to enable the delivery of the Council's housing requirement.

2.9 In combination policy SD3 and HOU1 provide a proposed split of housing as detailed in the Table 1 below:

Table 1: Distribution of Growth

Tier of hierarchy	Settlement	Commitments (up to 31.03.2019)	Completions (01/04/2016 - 11.02.2020)	Proposed allocation / growth	Total Growth	Overall % of development
Large Growth Towns	North Walsham	209	362	2150	2721	47.3
	Fakenham	1180*	189	680	2049	
	Cromer	177	109	592	878	
Small Growth Towns	Wells	30	79	80	189	17.3
	Sheringham	235	111	135	481	
	Holt	339	218	327	884	
	Stalham	71	87	150	308	
	Hoveton	56	2	150	208	
Service Villages	Briston & Melton Constable	116	33	80	229	3.9
	Mundesley	26	57	50	133	
	Ludham	9	1	40	50	
	Blakeney	5	19	30	54	
Small Growth Villages	Aldborough^	5	0	15	20	7.8
	Badersfield	0	0	37	37	
	Bacton^	9	46	31	86	
	Binham	19	20	8	47	
	Catfield^	10	3	27	40	
	Corpusty & Saxthorpe^	21	7	19	47	

	East and West Runton+	15	12	43	70	
	Happisburgh ^	12	3	24	39	
	High Kelling	4	0	17	21	
	Horning^	6	2	29	37	
	Little Snoring^	29	13	16	58	
	Little Walsingham^	10	4	21	35	
	Overstrand^	15	46	25	86	
	Potter Heigham±	2	3	0	5	
	Roughton^	33	32	24	89	
	Sculthorpe	4	3	20	3	
	Sea Palling±	3	0	0	27	
	Southrepps^	8	11	21	40	
	Sutton	0	3	30	33	
	Trunch	13	27	24	64	
	Walcott±	9	2	0	11	
	Weybourne^	8	11	21	40	
	Total proposed allocation in Infill villages			452		
All other Areas		373	300		673	5.6
	Windfall over the plan period				2160	18.1
Total		3061	1815	4916	11952	

* Fakenham Commitments Includes outline application for 950 dwellings (PO/17/0680), which has not yet been granted.

** Corpusty and Saxthorpe Neighbourhood Plan allocates three priority development sites

+ Combined for the purposes of producing a 5% growth figure based on Census data

^ Indicates settlements which currently have a settlement boundary

± indicates that although the settlement has the service and facilities to be considered an infill village, the settlement is environmentally constrained and no growth is proposed.

Settlement referred to as a '**Constrained Small Growth Village**'

The Local Plan housing apportionment table sets out the level of growth expected in the District. Some of this housing will already have been built by the time the Plan is adopted and other sites will also have obtained planning permission but not yet have been built (commitments). The table should therefore be seen as indicating the direction of travel and be indicative as a point in time. A future working party will consider the final settlement numbers in relation to distribution, preferred site options and land availability following separate discussion on the finalisation of site options. Percentage growth figures are likely to change the closer to submission and adoption as completions and commitments change.

2.10 Although it is not the purpose of this report to discuss the overarching numbers it is worth noting at this stage that It must be recognised that there is no one single factor that determines the precise level of growth in a particular location. There is a complex relationship between development needs, opportunities and constraints which inform decisions and detailed through a complex matrix of considerations set out in the sustainability appraisal, appropriate assessment (Habitat Regulation Assessment) and the appraisal methodologies set out in the background papers and site assessment process. There are differing opinions on how such a balance should be struck. Some may argue that the environmental impacts should be given less weight in the interests of providing more homes in particular locations, similarly some will argue that viability should lead to an increase in numbers in the more

“marketable “areas of the District, others however take the view that protecting the landscape and environment is the more important concern, while social considerations remain the priority of others. These matters will be tested at examination in relation to whether the Plan proposes an appropriate approach that is justified by the supporting evidence and consideration of the reasonable alternatives. It is important to remember that policies and decisions that flow from these policies are in response to meeting development pressures and District needs and are informed by evidence and a methodology and approach that is applied in a consistent way across the whole of the district.

3. Feedback Regulation 18

- 3.1 The regulation 18 consultation document included a commitment to produce a Part 2 Plan in which, infill opportunities and small scale allocations of up to 20 homes would be brought forward in order to identify policy HOU1 policy requirement of a minimum 400 dwellings across the identified small growth settlements. A call for sites in these locations resulted in a further 72 sites being put forward across 20 locations. This was in addition to those already identified through the earlier HELAA process.
- 3.2 In Total 209 sites have been put forward across this tier, comprising of 117, 1ha and below, and 92 sites over above the 1 heater threshold,
- 3.3 Feedback on the approach (SD3) can be seen in the Schedule of Responses previously reported to Members. Summaries are contained in Appendix 3 of this report and are summarised below:
- 3.4 **Parish Councils (7):** the majority of responses highlighted the requirement for growth to be located in locations with services with some suggesting that the limited services in these rural village locations is not conducive to further expansion. The reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small-scale allocations ran the risk of disproportionate and unsustainable growth.
- 3.5 The majority of **individual respondents** who objected (40) objected to Policy SD3 in relation to the provision of growth in the Small Growth Villages and the Countryside. Housing development should be focused where there is appropriate infrastructure, public transport, healthcare and other services including employment and the approach fails to integrate the problems of climate crisis. Many suggested that rather than allocating in these villages, development be allowed on infill and brownfield sites. For those that supported the overall policy approach (10+15 general comments) it was a similar message with support given to the appropriate strategy that directs growth to those settlements that have services and where it results in more sustainable growth.
- 3.6 Collectively most commented that in order to meet environmental objectives, development should be focused where appropriate infrastructure, services, public transport and employment are in place and where there is a specific housing need and the overall support for focusing development in Large Growth Towns, which are the largest most sustainable locations and also able to accommodate growth.
- 3.7 Specifically, in relation to Small Growth Villages feedback suggested that the identified small villages remained unsuitable locations for growth as there is no local demand and limited employment or services. There was, however, strong support for the provision of affordable housing in such villages. Many considered that allocating development in Small Growth Villages would have a knock on impact on the delivery of rural exception affordable housing schemes. Development on small

suitable infill plots was, however, generally supported. On the other side, some considered that growth in the Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites and that other settlements should also be promoted.

3.8 Comments from **Statutory bodies and organisations** (28) were mixed. Key issues raised included:

- The requirement that site selection should be informed by SA and HRA and have high regard to the landscape;
- The small village requirement of policy SD3 (400) increased and an allowance for residential growth to come forward adjoining or close to the existing confines of a settlement. i.e more flexible approach;
- More certainty through less reliance on windfall;
- Concern regarding the impact of estate housing;
- Those representing the larger agricultural estate management sought greater flexibility that could allow for the facilitation of estate growth such as, but not limited to and key worker accommodation.

3.9 Please note members of the working party have previously received a printed copy of the Schedule of Representations Summary Document and the full Schedule of Representations is available in the Members Room along with commentary on the Local Plan Portal.

National Policy

3.10 The revised National Planning Policy Framework, NPPF was published in February 2019 and the Planning Practice Guidance, PPG, on line resource provided guidance on its implementation. Such policy, along with guidance contained in the PPG, lead to the production of the policy approach consulted on and is reviewed in more detail in Background Paper No 2.

3.11 Briefly, the NPPF states that: *planning policies and decisions should enable, the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship* para 83.

And

3.12 *In order 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.* Para 78.

4 Identification of Small Growth Settlements

4.1 The 23 settlements identified in the regulation 18 version of the Plan as Small Growth Villages were selected on the basis of their social and economic sustainability in terms of their level and accessibility of services and facilities. The settlements have been reviewed in line with the services/facilities methodology as established within Background Paper 2 – Distribution of Growth and the feedback

from the consultation. The full review is set out in Appendix 1 which also contains a summary table.

- 4.2 **Consultation Feedback:** A number of individual comments, along with the Parish Councils of Bacton & Edington, High Kelling, Roughton, Southrepps and Weybourne, expressed a desire not to be identified as a Small Growth Villages (see summary of comments within Appendix 3) for various reasons, including preference for exception site development, impacts on existing character & infrastructure. It is confirmed that these settlements do meet the requirements of the methodology set out in Background Paper 2: Distribution of Growth to be identified as Small Growth Villages. It is important for the emerging Plan to have a strategic and consistent approach and consequently, decisions need to be made and justified by this established methodology. Whilst the concerns raised within the consultation comments are acknowledged, it is considered that these comments do not alter the wider strategic identification of these settlements as Small Growth Villages. As such, it is recommended that these settlements remain as Small Growth Villages.
- 4.3 Conversely a number of comments suggested that, the settlements of Bodham, Edgefield and Northrepps should qualify as Small Growth Villages. Both the settlements of Bodham and Northrepps were identified as part of the Initial Sift (Stage 2) of the methodology set out in Background Paper 2. This revealed that Bodham did not have any key services (school, convenience shop or GP surgery), which meant it was rejected and that Northrepps did not have the requisite 4 secondary or desirable services and so was also rejected at this stage. These two settlements have been reviewed in light of consultation comments and it is confirmed that the level of services remains below the threshold of services/ facilities needed and as such, they do not meet the requirements to be identified as a Small Growth Village.
- 4.4 The settlement of Edgefield was not included within the Initial Sift (Stage 2 of Background Paper 2) and so an assessment has been carried out in accordance with the methodology. This has concluded that the settlement of Edgefield does not have any key services (one key service is required of either a school, convenience shop or GP surgery) and consequently it does not meet the criteria to be identified as a Small Growth Village.
- 4.5 Feedback identified that the village of Langham does not contain the required level of services/ facilities, as set out in the methodology, to be considered as a Small Growth Village and consequently it is recommended that Langham is removed from the list of Small Growth Villages.
- 4.6 **Constraints:** The review has highlighted that although the identified settlements meet the service criteria to be Small Growth Villages, the potential for a number of settlements to contribute to future growth is likely to be constrained for environmental reasons. It should be noted that Sea Palling meets the service requirements of the methodology, but was previously removed from the list of Small Growth Villages, due to its location being entirely within Flood Zone 3A. Two other settlements of Potter Heigham and Walcott have also been identified as constrained settlements. The majority of the village of Potter Heigham is located within Flood Zones 2 and 3A. This constrains the village, with only the northern extent of the settlement situated in Flood Zone 1. Taking climate change into account, the majority of the settlement of Walcott is constrained by flood risk (falling within Flood Zones 2 and 3A), with only pockets to the southeast of the village within Flood Zone 1. Walcott's coastline is entirely within the Coastal Change Management Area, CCMA, this encompasses a large amount of the built form.

- 4.7 All three settlements meet the service/ facilities requirements to be identified as Small Growth Villages, but the extent of flood risk and CCMA to these three villages, particularly when factoring in climate change, is significant enough to acknowledge that their ability to contribute to the delivery of future growth is uncertain. Therefore, it is recommended that they are identified as Constrained Small Growth Villages, where growth could take place subject to compliance with national and local policy but any such growth should not be relied upon to meet strategic housing needs of the Local Planning Authority.
- 4.8 Horning continues to have restrictions on growth due to ongoing issues at Horning Water Recycling Centre (WRC), as it is over or very near to current permitted capacity. The Council has signed a Joint Position Statement that will be updated through the final Infrastructure Position Statement, IDP. Anglian water has undertaken investigations and identified investment priorities in order to manage the rising nutrient loads into the River Bure through works at Knackers Wood WRC. Given that additional future capacity is expected within the plan period, it is considered that the settlement of Horning should remain as a Small Growth Village and contribute to the strategic needs of the District.
- 4.9 **Conclusion: identification of Small Growth Villages:** The following settlements are identified as Small Growth Villages: Aldborough, Bacton, Badersfield, Binham, Catfield, Corpusty & Saxthorpe, East Runton, Happisburgh, High Kelling, Horning, Little Snoring, Little Walsingham, Overtstrand, Potter Heigham, Roughton, Sculthorpe, Sea Palling, Southrepps, Sutton, Trunch, Walcott, West Runton and Weybourne.
- 4.10 The settlements of Potter Heigham, Sea Palling and Walcott are identified as Constrained Small Growth Villages, as their growth should not be relied upon for the strategic needs of the District, as indicated in the summary table in appendix 1.
- 4.11 Corpusty & Saxthorpe have an adopted Neighbourhood Plan (NP), in which two Priority Development Areas (PDA) for housing and one PDA for mixed residential and business use, have been allocated. It is considered that these sites will adequately account for the planned future residential growth of the settlement. It is considered that their identification within the Neighbourhood Plan does not prevent the settlement from being included as a Small Growth Village, as the settlement continues to meet the threshold of services/facilities required within the methodology.

5 Approach to Growth – Small Growth Villages

- 5.1 The NPPF requires that 'planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- 5.2 The Local Plan includes a settlement hierarchy, with site allocations being included for settlements in the top three. For these 12 settlements, which include the larger villages, market towns and principle growth towns, there is a specific focus and degree of certainty provided about the specific sites that will be developed in each of these locations during the plan period. Policy SD3 also required that a minimum of 400 homes are delivered across a number of smaller villages.
- 5.3 Although reduced, these smaller villages also provide a level of service provision, and as such policy SD3 seeks to deliver a minimum of 400 homes across a wider geographic area partly to ensure villages remain vibrant and thriving communities, and partly in order to provide choice and flexibility to those living in the rural hinterland.

- 5.4 Although 209 sites have been put forward across the identified Small Growth Villages³, in order to select allocations it would be very difficult to undertake a detailed assessment of what the appropriate level of growth would be for each of the smaller villages taking into account the distinct constraints and opportunities of every settlement. There is also not one suitable growth figure that could be applied to every settlement, given that every settlement is distinct. Some have large tracts of land at risk from coastal flooding and or are located in the Coastal Change Management Area while others have infrastructure issues, which may be overcome in the plan period. All add to uncertainty around delivery.
- 5.5 A revised approach is proposed for the delivery of growth in the small growth villages** based on a more flexible approach, equitable distribution and criteria approach delivered through market forces. In line with the historical delivery it is considered appropriate for the revised approach building on consultation feedback to seek a ceiling of 6% growth for those villages identified as Smaller Growth Villages. This would be in line with the target set but allow for potential growth.
- 5.6 With such an approach, Small Growth Villages will not receive specific allocations but each location will see development in line with revised settlement boundaries. In general terms inside a settlement boundary the principle of new development for market housing is deemed acceptable. As such the approach is one that allows for organic growth through infill development on brownfield and suitable greenfield and through with appropriate development on land immediately and functionally adjoining to the settlement boundary, but at a scale and design appropriate to the location and particular settlement where:
- 5.7 It would not lead to the number of dwellings in any of the selected Small Growth Villages increasing by more than 6% from the date of adoption of the Plan⁴. Unless it was through exception development and of additional growth identified through neighbourhood planning or through other rural policies.
- Although completions and commitments may change as the plan nears submission, collectively growth within this tier of the hierarchy should represent no more than 10% growth;
 - The design of the scheme contributes to preserving and enhancing the historic nature of communities, including local connectivity in the village and wider GI networks;
 - It remains positively prepared introducing an element of flexibility and competition.
- 5.8 The amended policy can be seen in Appendix 2
- 5.9 Settlement boundaries in these rural settlements will be reviewed through the application of the criteria based approach including, and in broad conformity reflecting the below:
- Recent planning approvals;
 - Infilling and rounding off opportunities;

³ As identified at Regulation 18 stage

⁴ This is to establish that the plan remains positively prepared. Backdating to start of plan period may result in no planned levels of growth as current proposals may absorb growth allowed.

- Adjoining small scale⁵ brownfield sites;
- Environmental constraints.

The total number of dwellings will then be counted and used as a base date to inform the future policy approach, updating the current evidence base – the 2011 census data.

- 5.10 Outside the identified villages it is not desirable to identify development boundaries or proportion growth and it remains the case that these villages and hamlets will be identified as “Countryside” and fall under SD4, development in the Countryside and the suit of policies as set out above. These villages and hamlets are of a small scale, have little to no services, often more sporadic in nature, and or remote.
- 5.11 The approach is in line with the broad support and approach outlined in SD3, and reflects the policy ambition to deliver approximately 10% of growth across the small growth villages. In doing so the approach helps to address the requirement to ensure an adequate supply of sites of appropriate scale and distribution earlier in the Plan period.
- 5.12 Overall the approach provides greater flexibility than site allocations but at the same time ensures that:
- The Plan meets the requirement of policy SD3 of 400 dwellings and provides some level of growth in more rural locations in order to support local services and enhance the rural economy, thereby helping to maintain the viability of rural communities;
 - Adds a level of locally distinctive approach to sustainable development that is appropriate for North Norfolk;
 - Delivers affordable housing in line with policy percentages;
 - Delivers a criteria approach to growth allowing for a more equitable distribution than allocations would bring;
 - Allows developer interests to be promoted in accordance with the Plan as a whole ensuring early delivery and helping with future land supply calculations;
 - Seeks to address NPPF para 68 requirements of small site provision Supports smaller developers;
 - Windfall development is not compromised and the scale of development is limited in each location and collectively over the whole tier;
 - Allows for those communities that wish to identify additional allocations through Neighbourhood planning and through policy SD2 based on community support;
 - Gives communities developing neighbourhood plans a base housing target as required by the NPPF;
 - Complements the suit of policies that deliver the positive policy framework in the Local Plan with regard country side development and windfall growth;
 - Provides another source of self-build supply required through national policy;

⁵ new site not larger than one hectare

- 5.13 Outside the growth limits allows local communities and Housing providers to identify and bring forward additional sites for affordable housing through exception site development in order to address identified local needs.
- 5.14 In doing so it is recommended that the proposed cap on settlement size (5% detailed in bullet 4 of HOU4 Affordable Homes in the Countryside (rural exception site development) be removed. Exception site development should be based on need based on at the local level (parish and surrounding) and should not be restricted.

6 Flexible & Exception Growth

- 6.1 The following section of the report reviews policies SD4, SD2, HOU3, SD6, HOU5, & HOU4. For each policy the updated policy wording is detailed in appendix 2. A summary of the relevant consultation feedback is contained in Appendix 3.
- 6.2 **Policy SD4.** No substantial issues were raised during the consultation with the prevailing view being that growth should only be supported in the countryside in order to meet identified need and that the approach taken was the right approach with regard to sustainable development in North Norfolk.
- 6.3 Norfolk County Council Minerals and waste team requested the removal of bullet 2 It is proposed to remove bullet 2 in line with Minerals and Waste team and for clarity link bullet 4 to HOU4 adding certainty around the application of key workers in relation to functionally linked to the land and also allowing a more flexible approach with rearguard agricultural worker's accommodation needs on the larger estates.
- 6.4 **Policy SD2.** The policy received very limited comment. The principle of community led development (through neighbourhood plans) was generally supported by those that did respond. Clarification was sought on the extent of community support with some organisations seeking amendments to the approach around the inclusion of estate masterplans, greater recognition and endorsement of market housing in rural areas, recognising the contribution to sustainable development and the use of housing needs assessments in demonstrating need, and hence support in rural areas. Minor amendments are proposed to add clarity and to ensure continuity/consistency with other policies such as HOU3 and HOU6.
- 6.5 **Policy HOU3.** The policy received limited feedback with the majority supporting the approach and rising no substantial issues. The policy actively supports the provision of affordable housing as an exception to policies in the Local Plan in order to address and provide for a local identified need. The policy provides a consistent approach across the District. The removal of bullet 4 is proposed in line with para 5.15 above so provision is aligned with need. In order to align better with the Council's Housing strategy adjacent is changed to adjoin in the last paragraph. Clarity is proposed to be added around the approach to market housing in the supporting text.
- 6.6 **Policy SD6.** No substantive comments were received in relation to this policy. Further clarity was sought as to the identification of such site and they will be identified through the submitted policies map. Although pubs are identified as important local facilities for which the policy applies one comment requested amending the policy in order to make it more difficult to change between Use Class, specifically in relation to Public housing. Legislation already exists through the Localism Act that allows communities to identify Assets of Community Value which allows a community the right to bid if such an asset becomes available. Minor amendments to the policy are proposed for reasons of clarity.

- 6.7 **Policy HOU5.** The accommodation needs of Gypsies and Travellers should be considered alongside the housing needs of the whole community. Norfolk Caravan and Houseboats Needs Assessment 2017 identified an annualised requirement for 0.4 pitches between 2017 and 2022 and a pitch requirement of 8 up to 2036. The approach through a criteria led policy remains the most appropriate given this low level of need. Minor amendments are proposed for reasons of clarity and to align the policy approach to the wider sustainable development approach envisaged by the Local Plan.
- 6.8 **Policy HOU4.** The policy received limited feedback from the consultation, of which was in general support of the policy. One comment expressed a desire to extend the policy to cover other types of key workers within towns, but it should be highlighted that the point of policy HOU4 is to assist with providing residential accommodation to those in essential need in areas that are likely to otherwise be unsustainable. It is proposed to amend the policy slightly to align it with policy HOU7 (re-use of rural buildings in the countryside) to ensure that the conversion of an existing building is considered before new build. Specific reference to environmental impact is not considered to be required as any proposal would need to satisfy other relevant policies, such as Policy ENV2 – Protection & Enhancement of Landscape & Settlement Character.

7 Recommendations

1. **It is recommended that members endorse the changes to the list of Small Growth Villages.**
2. **It is recommended that members endorse the revised approach and delegate responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Options

There are three options available for consideration

- Option 1: Members endorse the revised approach.**
Option 2: Members do not endorse the revised approach.
Option 3: Members provide support for the revised approach and provide further direction

8 Legal Implications and Risks

- 8.1 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 evidence, the application of a consistent methodology and take account of public feedback.
- 8.2 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.
- 8.3 By applying a consistent methodology base around service provision, irrespective of critical constraints, there is a risk that settlement boundaries in all of the settlements may not be identified and that growth may not come forward. This is mitigated by the proposed approach which identifies settlements based on services but then does not reply on a requirement coming forward in the settlements where in the main, environmental constraints could significantly restrict growth - as detailed in table 1.

8.4 The approach delivers on SD3 commitments but allows a degree of flexibility and competition, although less certainty than allocations it still allows for exception site development and growth for local homes in respect of identified local need. The policy wording, is designed to be more specific over the location of sites in relation to a settlement boundary than that used in the rural exception policy and the approach no longer seeks to limit settlement size through exception growth but link such growth to that of community need.

9 **Financial Implications and Risks**

9.1 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.

Appendix

Appendix 1 – Small Growth Village Review

Appendix 2 – Policies Review

Appendix 3 – Regulation 18 Consultation Feedback Summaries.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Summary Table: Small Growth Village Review

Settlement in Policy SD3	Services Criteria met Y/N	Significant Environmental Constraints Y/N	Can a settlement boundary be drawn Y/N	Small Growth Village (SGV)/ Constrained SGV/ Countryside
Aldborough	Y	N	Y	SGV
Bacton	Y	N	Y	SGV
Badersfield	Y	N	Y	SGV
Binham	Y	N	Y	SGV
Catfield	Y	N	Y	SGV
Corpusty & Saxthorpe	Y	N	Y	SGV
East Runton	Y	N	Y	SGV
Happisburgh	Y	N	Y	SGV
High Kelling	Y	N	Y	SGV
Horning	Y	N	Y	SGV
Langham	N	N	N/A	Countryside
Little Snoring	Y	N	Y	SGV
Little Walsingham	Y	N	Y	SGV
Overstrand	Y	N	Y	SGV
Potter Heigham	Y	Y	N	Constrained SGV
Roughton	Y	N	Y	SGV
Sculthorpe	Y	N	Y	SGV
Sea Palling	Y	Y	N	Constrained SGV
Sutton	Y	N	Y	SGV
Southrepps	Y	N	Y	SGV
Trunch	Y	N	Y	SGV
Walcott	Y	Y	N	Constrained SGV
West Runton	Y	N	Y	SGV
Weybourne	Y	N	Y	SGV

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Aldborough:
Summary Regulation 18 Comments: none specific to being potentially allocated as a small growth village.
Services/facilities review: no changes. Constraints: Any proposed development would need to take account of the environmental and infrastructure constraints set out in Background Paper 2, but these constraints would not limit the principle of development within the settlement. Land supply: As part of the Call for Sites, 24 sites have been recorded as alternative sites for housing development and 5 additional sites have been submitted under Regulation 18.
Conclusion: Aldborough continues to meet the criteria to be identified as a SGV.

Bacton:
Summary Regulation 18 Comments: Individual's: (LP207, LP603) Objection to Bacton being identified as a SGV due to impact development could have on the character of the village, which historically has a 'scattered or 'dispersed' settlement pattern. Express concerns about the adequacy of infrastructure, public transport and traffic and associated pollution. Difficulty getting to doctors, schools and shops. Parking and a bypass of the old part of the village is needed before development is built. Issue with the number of second homes and impact on housing affordability. PC & TC's: Bacton & Edingthorpe PC (LP239) object to Bacton being identified as a SGV, instead wishing to allow the local community to exercise greater control of future housing growth by relying on the provisions within Policy HOU3 and exception sites delivery. The Parish Council comment that the village does not have enough facilities conducive for further expansion, as two public houses (The Ship and Duke of Edinburgh) have been lost since the previous local plan. The retail offer is very limited and generally geared towards holidaymakers – a small scale village store, fish & chip shop and cafes. In addition, the Post Office has extremely limited hours (only open 30 mins a week), there is no doctor's/ medical service within the parish and a limited bus service.
Services/facilities review: The Parish Councils objection in principle and comments are noted with regard to the services/ facilities/ public transport. However, the amount and range of existing services has not altered since the assessment within Background Paper 2. Therefore, no changes are proposed. Constraints: As set out in Background Paper 2, the village of Bacton is constrained by tidal flooding to the southeast and surface water flooding predominantly along the roads through the village. Bacton's coastline falls within the Coastal Erosion Constraint Area (CECA), which encroaches the built form to the northwest and southeast of the village. Also the northern area falls within the 50 year coastal erosion zone. Land supply: As part of the Call for Sites & HELAA, 8 sites have been recorded as alternative sites for housing development and 3 additional sites have been submitted under Regulation 18. It is noted that the northern part of BACT09 falls within the 100 year coastal erosion zone.
Conclusion: Whilst the Parish Council's comments are noted with regards to services and facilities, the amount and range has not altered since the assessment within Background Paper 2. As such, it is concluded that Bacton continues to meet the criteria to be a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Badersfield:
Summary Regulation 18 Comments: Statutory Bodies & Organisations: (LP803) Hopkins Homes comment that the village lacks market attractiveness due to the presence of the prison and that half of the village falls within Broadland District Council, which further restricts the ability of the Council to secure growth. (LP736) Glavenhill Ltd. comments that whilst Badersfield is considered to lack the necessary services to be 'designated' a larger village within the Settlement Hierarchy, it is capable and in need, due to the presence of a successful Enterprise Park that lacks a large residential / working population nearby, and the need to provide additional new affordable homes, of accommodating additional residential and local service provision beyond that facilitated through draft Policy SD3.
Services/facilities review: no changes required. Constraints: There is pockets of known surface water flooding, mainly along roads within the village. Land supply: As part of the Call for Sites, 1 site has been recorded as an alternative site for housing development and 2 additional sites have been submitted under Regulation 18.
Conclusion: Badersfield continues to meet the criteria to be a SGV.

Binham:
Summary Regulation 18 Comments: Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that the village of Binham (along with 7 other identified SGV's) is capable of sustaining in excess of 27 additional dwellings.
Services/facilities review: no changes to assessment. Constraints: Any proposed development would need to take account of the known environmental and infrastructure constraints set out in Background Paper 2, but these constraints would not limit the principle of development within the settlement. Land supply: As part of the Call for Sites & HELAA, 1 site has been recorded as alternative sites for housing development and 2 additional sites have been submitted under Regulation 18.
Conclusion: Binham continues to meet the criteria to be identified as a SGV.

Catfield:
Summary Regulation 18 Comments: none.
Services/facilities review: no changes. Constraints: The village is constrained to the north and east by areas of land that fall within flood zones 2 and 3. There are further flood risk constraints to the west. Land supply: As part of the Call for Sites & HELAA, 11 sites have been recorded as alternative sites for housing development, 2 of these for mixed use.
Conclusion: Catfield continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Corpusty & Saxthorpe:
Summary Regulation 18 Comments: Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that the village of Corpusty (along with other identified SGV's) is capable of sustaining in excess of 27 additional dwellings.
Services/facilities review: no changes to assessment. Constraints: no changes identified. Land supply: As part of the Call for Sites and regulation 18 no sites have been put forward. However, Corpusty & Saxthorpe have an adopted Neighbourhood Plan (NP), dated 1 st April 2019, which allocates two Priority Development Areas (PDA) for housing and one PDA for mixed residential and business use.
Conclusion: Corpusty & Saxthorpe continues to meet the criteria to be identified as a SGV. Although no sites have been put forward as part of Regulation 18, within the Corpusty & Saxthorpe NP, which combined will adequately accommodate future growth.

East Runton:
Summary Regulation 18 Comments: none specific to being potentially allocated as a small growth village.
Services/facilities review: no changes. Constraints: no changes to those listed within Background Paper 2. Land supply: 8 housing sites have been submitted under Regulation 18.
Conclusion: East Runton continues to meet the criteria to be identified as a small growth village for modest, small scale growth in order to help address housing need.

Happisburgh:
Summary Regulation 18 Comments: Individual's: (LP603) objects to Happisburgh as a SGV due to issues with second homes, affordability, impact on infrastructure, public transport and traffic.
Services/facilities review: no changes. Constraints: No changes to those listed within with Background Paper 2. Land Supply: As part of the Call for Sites & HELAA, 12 sites have been recorded as alternative sites for housing development and 1 additional site has been submitted under Regulation 18.
Conclusion: Happisburgh continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

High Kelling:
<p>Summary Regulation 18 Comments:</p> <p>Parish & Town Councils: (LP147) High Kelling PC objects stating concern that creeping development in such a location would threaten the quality of the landscape. It recognises that some development is necessary but feels such development should enhance the character of the village and its setting within the countryside and the AONB and considers that there is potential for development in those parts of the village outside the AONB. High Kelling shares medical and dental provision with Holt, which means additional pressure on services already overstretched with the volume of users.</p> <p>Statutory Bodies & Organisations: (LP291, LP293) White Lodge Ltd. supports identification of High Kelling as a SGV as it has a good range of services including post office, shop, village hall and church. Holt hospital to the west of village includes a medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot. Locating development in High Kelling, would, therefore, enhance and maintain existing services in the village and other surrounding villages.</p> <p>(LP746, LP749) Kelling Estate LLP also supports identification of High Kelling as a SGV, as it is served by a primary school, convenience shop and GP surgery, as key services. It states that the village offers infill plots, which could be released for housing development that would make a positive contribution to meeting future housing needs, while preserving the special character and appearance of the conservation area.</p>
<p>Services/facilities review: no changes. The settlement in its own right would not meet the requirements of the methodology, but due to its proximity to Holt, it means that the village does comply</p> <p>Constraints: It is noted that the part of the settlement to the north of the Cromer Road (A148) falls within the North Norfolk AONB and the southern part does not, where the principle of development would be more favoured by the Parish Council.</p> <p>Land Supply: As part of the Call for Sites, 2 sites have been recorded as alternative sites for housing development and 3 additional sites have been submitted under Regulation 18.</p>
<p>Conclusion: High Kelling continues to meet the criteria to be identified as a SGV.</p>

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Horning:

Summary Regulation 18 Comments:

Statutory Bodies & Organisations: (LP746, LP749) Kelling Estate LLP notes that in the adopted Site Allocations DPD (2011) it was considered appropriate to allocate sites for more than 20 dwellings at a number of 'Small Growth Villages', one being in Horning (a site for 26 dwellings). This site is subject of a current planning application (reference 11/1505) that has remained undetermined for approaching 8 years. The delay is due to significant constraints at Horning in relation to lack of capacity in the local water treatment system and the heightened sensitivity of the nearby water environment due to the immediate proximity of the village to the Norfolk Broads. The most recent joint position statement signed by the Council, the Environment Agency (EA), the Broads Authority (BA) and Anglian Water (AW) suggests that this position is under constant review.

Statutory Bodies & Organisations: (LP477, LP478) EA comments that the Councils should be aware of constraints at Horning Water Recycling Centre (WRC's) (amongst others) as it is either over or very near to current permitted capacities. Development within this area needs to be planned with caution and early consultation with the sewerage company will be vital. No development should commence until clear plans are agreed for the necessary sewerage infrastructure improvements.

Services/facilities review: no changes.

Constraints: These remain as set out in Background Paper 2. In addition, the EA and AW comments regarding the Horning WRC indicate that there is likely to be an embargo on development throughout the plan period.

Land Supply: As part of the Call for Sites & HELAA, 6 sites have been recorded as alternative sites for housing development and 10 additional sites have been submitted under Regulation 18.

Conclusion: Although the constraints listed will affect the deliverability of development within the plan period, this does not change the status of inclusion of Horning, as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Langham:
Summary Regulation 18 Comments: Individual's: (LP778) Langham is listed as having a community shop and post office (within the community shop). There is no shop or post office. Statutory Bodies & Organisations: (LP803) Hopkins Homes supports that the village of Langham (along with other identified SGV's) is capable of sustaining a development in excess of 27 additional dwellings. (LP234) Fleur developments Ltd. also supports Langham in the same manner.
Services/facilities review: Following up on comment LP778, omitting a community shop (as a key service) and post office (as a secondary service) means that Langham (with 1 key service (Langham Village School), 2 secondary services (Public House and Village Hall) and 1 desirable service (Place of Worship - St. Andrew and St. Mary's Church)) falls below the required level of services as set out in Background Paper 2: Distribution Growth. Constraints: as recorded within Background paper 2. Land Supply: As part of the Call for Sites, 1 site has been recorded as alternative sites for housing development and 1 additional site has been submitted under Regulation 18.
Conclusion: Langham does not meet the threshold of services required under the methodology set out in Background Paper 2 and as such, it should be removed from the list of Small Growth Villages.

Little Snoring:
Summary Regulation 18 Comments: Individual's: (LP144) Objects to Little Snoring being a SGV, but should be regarded as being capable of small infill development, as it does not currently have the necessary services (eg. small shop attached to caravan site, infrequent bus service, no village hall, limited capacity at school). (LP786) objects on the basis that any further development is likely to be in to open countryside, which would have an adverse impact on the landscape/ wildlife and the lack of services (as already stated). Also, limited public transport, issues with road network, broadband nearing capacity, Limited capacity at WasteWater treatment works. Statutory Bodies & Organisations: (LP803) Hopkins Homes supports that the village of Little Snoring (along with other identified SGV's) is capable of sustaining a development in excess of 27 additional dwellings. (LP829) Westmere Homes also supports Langham in the same manner.
Services/facilities review: no changes. Constraints: as recorded within Background Paper 2. Land Supply: As part of the Call for Sites & HELAA, 13 sites have been recorded as alternative sites for housing development and 2 additional sites have been submitted under Regulation 18.
Conclusion: Little Snoring continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Little Walsingham:

Summary Regulation 18 Comments:

Statutory Bodies & Organisations: (LP830) Walsingham Estate Management have noticed various inaccuracies with regard to Little Walsingham. Secondary services include the Bull Inn and the Black Lion Hotel. Meeting places include Village hall and parish hall. Desirable services include three vehicle repair shops (centre of village and two on the Industrial estate), three Churches, Russian Orthodox, Methodist and Anglican. Egmore employment site lies within the parish boundary.

Services/facilities review: The Walsingham Estate Management (LP830) comments are acknowledged with regard to other services and facilities. It is noted that Great Walsingham has a Parish Hall and that there are approximately eight places of worship. Combined, the services and facilities meets the criteria as set out in the methodology of Background paper 2.

Constraints: as recorded within Background Paper 2.

Land Supply: As part of the Call for Sites & HELAA, 7 sites have been recorded as alternative sites for housing development and 2 additional sites have been submitted under Regulation 18.

Conclusion: Little Walsingham continues to meet the criteria to be identified as a SGV.

Overstrand:

Summary Regulation 18 Comments:

Statutory Bodies & Organisations: (LP746, LP749) Kelling Estate LLP supports policy SD3 but considers that whilst some villages may yield a very limited number of dwellings over the plan period others by reasons of their size, location or level of service provision may be capable of supporting a greater level of growth. This change would be consistent with the example set by the adopted Site Allocations DPD where it was considered appropriate to allocate sites for more than 20 dwellings at a number of 'Small Growth Villages'; Overstrand (35 dwellings). Accordingly the footnote to the policy should be amended to read: Infill development and new allocations (to be selected in a Part 2 Plan).

Services/facilities review: no changes.

Constraints: as recorded within Background Paper 2.

Land Supply: As part of the Call for Sites & HELAA, 10 sites have been recorded as alternative sites for housing development and 2 additional sites have been submitted under Regulation 18.

Conclusion: Overstrand continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Potter Heigham:

Summary Regulation 18 Comments:

Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that Potter Heigham contains a range of shops and services but lies almost entirely within the Environment Agency's Flood Zone 3, presenting an overriding constraint to development. Whilst the northern portion partially lies outside of FZs 2 and 3, it is largely severed from the core of the village by the A149. They note that a recent pre-application enquiry (reference IB/18/0340) sought to deliver a potential affordable housing exception site of 10 dwellings on one of the few parcels of land lying outside the Flood Zone. Officers concluded that other constraints existed in relation to the site, including deficient access, landscape impact and distance from services.

Services/facilities review: no changes.

Constraints: as recorded within Background Paper 2. The majority of the village is situated within Flood Zones 2 and 3A with only the northern extent of the settlement located within Flood Zone 1.

Land Supply: As part of the Call for Sites, 3 sites have been recorded as alternative sites for housing development and 4 additional sites have been submitted under Regulation 18.

Conclusion: Potter Heigham continues to meet the requirements to be identified as a SGV, but environmental constraints restrict the likely deliverability of development and so its growth should not be relied upon to meet strategic needs.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Roughton:

Summary Regulation 18 Comments:

Individual's: (LP254) Comments that sustainable expansion of the SGVs that have a number of services and act as limited service hubs for other nearby villages thereby comply with the provisions of paragraph 78 of the NPPF.

PC & TC's: (LP240) Roughton PC objects and concludes that Roughton should not be designated as a SGV as the status is unnecessary and puts a burden on existing infrastructure. This would allow the local community instead to exercise greater control in future housing growth over the plan period relying instead on the proposed provisions of Policy HOU03. The reasons for this is that Roughton Parish has previously accepted housing growth but now wish to control the quantity of housing within the village. Roughton has poor public transport links and the general level of service provision in the village is not conducive for its further expansion. We have minimal retail offering which is extremely small-scale. There are no doctors or any other medical facility within the Parish. ROU03 has still not been built on due to lack of interest from developers and this was allocated at the previous consultation circa 10 years ago.

Statutory Bodies & Organisations: (LP746, LP749) Kelling Estate LLP supports policy SD3 but reference to footnote 11 imposes a limit on development size at Small Growth Villages to up to 20 dwellings. They consider this arbitrary cap is unhelpful and unnecessary and could limit opportunities where larger schemes may be appropriate. The identified Small Growth Villages differ quite significantly in their size and range of service provision. Therefore while some villages may yield a very limited number of dwellings over the plan period others by reasons of their size, location or level of service provision may be capable of supporting a greater level of growth. This change would be consistent with the example set by the adopted Site Allocations DPD where it was considered appropriate to allocate sites for more than 20 dwellings at a number of 'Small Growth Villages'; Roughton (30 dwellings). Accordingly the footnote to the policy should be amended to read: Infill development and new allocations (to be selected in a Part 2 Plan).

Services/facilities review: no changes.

Constraints: as recorded within Background Paper 2. It is noted that the northern part of the village falls within the North Norfolk AONB, where four of the alternative sites are located.

Land Supply: As part of the Call for Sites, 11 sites have been recorded as alternative sites for housing development and 6 additional sites have been submitted under Regulation 18.

Conclusion: Roughton continues to meet the criteria to be a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Sculthorpe:
Summary Regulation 18 Comments: Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that Sculthorpe is a very small village of a predominantly linear nature with few clear infill opportunities. It also has a predominantly rural character that would be significantly impacted on by any development of scale. This is clear from the refusal of an application for 71 new dwellings at the heart of the village in 2015 (on land which comprises the only site currently promoted towards the HELAA), a scheme dismissed for exactly this reason. Recommends amendments to Policy SD3 to ensure that it forms the basis of a sound strategy: the deletion of Sculthorpe. (LP632, LP633) WSP Indigo, comments that the Council's assessment of Sculthorpe does not accurately represent its potential. The assessment of Sculthorpe in the Distribution of Growth Background Paper overlooks some services that Sculthorpe can offer both in the settlement and the wider area. Importantly, Sculthorpe's proximity to Fakenham is a key factor that has not been taken into account. The Council seems to have considered the proximity of nearby services in other areas. The assessment notes that the limited constraints identified would not limit the principle of development within the settlement. This is inconsistent with its categorisation as a SGV. The lack of constraints affecting the settlement, such as flooding or environmental designations, is a key factor that is not recognised in the emerging Local Plan strategy. The settlement hierarchy categorisation of Sculthorpe means that it is not favoured in the consideration of sites for allocation. Site H0216 risks being overlooked by the Council as Sculthorpe is classed as a Small Growth Village where only small sites will be assessed for allocation, despite its positive assessment in the HELAA. This removes the chance to consider the best sites for development that are in sustainable locations but disregarded by the Council's current methodology. The Distribution of Growth Background Paper identifies that the school is lacking capacity but the site is large enough to accommodate a new school as part of development proposals. The existing School could be further enhanced by the provision of new premises and a playing field. Early Delivery as well as its suitability and availability, as established in the Council's own evidence base, means the site is also deliverable in the short term.
Services/facilities review: The above comments are noted, but they do not alter the assessment of Sculthorpe as set out in Background Paper 2, based on the methodology contained therein. Constraints: as recorded within Background Paper 2. Land Supply: As part of the Call for Sites, 1 site has been recorded as alternative sites for housing development and 5 additional sites have been submitted under Regulation 18.
Conclusion: Sculthorpe continues to meet the criteria to be identified as a SGV.

Sea Palling:
Summary Regulation 18 Comments: none specific to the potential allocation as a Small Growth Village.
Services/facilities review: no changes. Constraints: as recorded within Background Paper 2. The village is entirely within Flood Zone 3A. Land supply: No sites have been put forward through Call for sites/ HELAA.
Conclusion: Whilst Sea Palling does meet the service requirements to be identified as a SGV, there is significant environmental constraints that would restrict the deliverability of development and so its growth should not be relied upon to meet strategic needs.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

<p>Southrepps:</p> <p>Summary Regulation 18 Comments:</p> <p>Individuals: (LP094, LP206, LP220, LP222, LP242, LP271, LP307, LP409, LP 428) Summary of objections state that any further development in Southrepps will eventually lead to overdevelopment, the loss of individual identity of the village within AONB, impact on wildlife, lack of public transport and put significant strain on the road network. Use empty homes and buildings first. The HELAA and Background Paper 2 describes the village as having no infrastructure constraints, but comments state that the narrow roads makes the village unsuitable for growth other than small sites of 5 or less and that the majority of sites identified within the HELAA do not have access onto roads suitable to take development. Remove Southrepps as a SGV designation. Comments conclude that remaining as a countryside village gives greater control to the local community in 'exceptions'/ affordable housing, whilst retaining its identity.</p> <p>(LP269) Comments that growth shouldn't be taken in isolation as development in Mundesley will have a direct traffic impact on Southrepps and other villages.</p> <p>PC & TC's: (LP225) Southrepps PC objects and states that along with the community of Southrepps, it is not opposed to development, but that this should be proportionate and not out of scale with the village in terms of its physical/social/environmental infrastructure, as some recent developments. The PC concludes that the village should NOT be included as a SGV in the emerging Local Plan and states that there would be no objection to the village retaining a settlement boundary, provided that any related policy in the new Local Plan makes it clear that any new development must be within it and very limited to small-scale – one or two plots. As such the preference is for the village to carry a 'Countryside' designation.</p> <p>Statutory Bodies & Organisations: (LP803) Hopkins Homes comments it is recognised that Southrepps contains a range of shops, services and amenities sufficient to sustain a level of growth over the plan period. It is, however, entirely washed over by the AONB. Due to the likely availability of alternative sites across the network of villages lying outside of the AONB it is unlikely that exceptional circumstances (as required in NPPF) could be identified, particularly as the village already comprises two allocations capable of accommodating 22 dwellings that are as yet undelivered.</p>
<p>Services/facilities review: Although the comments refer to some of the facilities/ services being outside the village, they remain within the required distance as set out in Background Paper 2 methodology. As such, no changes are recorded.</p> <p>Constraints: no changes.</p> <p>Land Supply: As part of the Call for Sites, 8 sites have been recorded as alternative sites for housing development and 1 additional site has been submitted under Regulation 18.</p>
<p>Conclusion: Southrepps continues to meet the criteria to be identified as a SGV.</p>

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Sutton:
Summary Regulation 18 Comments: Statutory Bodies & Organisations: (LP805) Firs Farm Partnership supports identification of Sutton as a SGV. Sutton has a good range of local facilities/ bus services. It is stated that Sutton is located within 1.8 miles of a range of services and facilities within Stalham, which is identified as a 'Small Growth Town' within the proposed settlement hierarchy. It comments that Sutton is capable of accommodating more than the 20 dwellings anticipated by draft Policy SD3 and in doing so can deliver community benefits. Requesting that the restriction of between 0 – 20 dwellings for small villages be deleted from the policy and be replaced by a criteria based approach to assessing settlement suitability and requirements to accommodate additional growth.
Services/facilities review: no changes. Constraints: no changes. It is noted that at least four of the alternative sites partly or wholly fall within flood zone 2. Land Supply: As part of the Call for Sites, 6 sites have been recorded as alternative sites for housing development and 8 additional sites have been submitted under Regulation 18.
Conclusion: Sutton continues to meet the criteria to be identified as a SGV.

Trunch:
Summary Regulation 18 Comments: Individuals: (LP157, LP205, LP409, LP428) Objects that if all the development goes ahead in Mundesley as planned there is a danger that Trunch will no longer be identifiable as an individual village with its own unique characteristics. Remaining as a countryside village gives greater control to the local community in 'exceptions' and providing social housing whilst still retaining its individual identity. Trunch has a conservation area at its heart so any new development would need to be on the fringes. Currently, Trunch has quite a low water pressure in the village. Any further development in Trunch or the surrounding areas will only increase that problem. The new sewerage plant at Swafield will only reduce current problems it will not solve future problems caused by new housing developments. The infrastructure needs to be put in place before any development can reasonably be considered. Return Trunch to a countryside classification. Services/facilities review: no changes.
Constraints: no changes. Surface water flooding is largely restricted to existing roads. Land Supply: As part of the Call for Sites & HELAA, 8 sites have been recorded as alternative sites for housing development and 4 additional sites have been submitted under Regulation 18.
Conclusion: Trunch continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

Walcott:
Summary Regulation 18 Comments: Individuals: (LP603) Objects stating that Walcott should not be categorised as a growth village due to issues relating to 2nd homes, affordability, impact on infrastructure, public transport and traffic. Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that Walcott indicates a lack of any available sites in the HELAA, that its location is almost entirely within the Coastal Erosion Zone and that it is in close proximity to the higher order settlement of Bacton.
Services/facilities review: no changes. Constraints: no changes. The majority of the settlement is located within Flood Zones 2 and/or 3A. Land Supply: As part of the Call for Sites, 1 site has been recorded as an alternative site for housing development located in Walcott Green.
Conclusion: Walcott continues to meet the requirements to be identified as a SGV, but environmental constraints restrict the likely deliverability of development and so its growth should not be relied upon to meet strategic needs.

West Runton:
Summary Regulation 18 Comments: Individuals: (LP409) Objects that building in small growth villages as identified in Policy SD3 has the danger of allowing 'urban sprawl' which results in East and West Runton becoming an extension of Sheringham and Cromer. Statutory Bodies & Organisations: (LP803) Hopkins Homes supports that the village of West Runton (along with other identified SGV's) is capable of sustaining a development in excess of 27 additional dwellings. (LP478) EA comments that it has no concerns for West Runton Water Recycling Centre (WRC).
Services/facilities review: no changes. Constraints: no changes. It is noted that there is differing levels of surface water flooding associated with the alternative sites. Land Supply: As part of the Call for Sites, 3 sites have been recorded as alternative sites for housing development and 2 additional sites have been submitted under Regulation 18.
Conclusion: West Runton continues to meet the criteria to be identified as a SGV.

Appendix 1 Policy SD3 - Small Growth Villages (SGV) Review

<p>Weybourne:</p> <p>Summary Regulation 18 Comments: Individuals: (LP771) Objects stating that Weybourne should not be a small growth village because (a) an inadequate bus service for working people; (b) the future of the village shop is in doubt (up for sale); (c) increasing proportion of second homes and holiday lets as likelihood that new development would be beyond the price of local people along with breakdown of community; (d) Weybourne is in the AONB. Increased development would negatively affect this and could damage existing tourism; (e) increased development risks reducing the habitat for wildlife. This would potentially conflict with international agreements to which the UK is a signatory; (f) inadequate parking in the village. Further development would increase pressure.</p> <p>PC & TC's: (LP168) Weybourne PC objects stating that Weybourne should retain its' designation as Countryside and should not be designated as a SGV due to the following factors: the lack of a full-time shop in the village and uncertainty regarding its future (up for sale); Lack of infrastructure, including but not limited to lack of places at local GP Surgeries and distance from a major hospital; the lack of a bus service in the village (out of season, the bus service in Weybourne is limited); The limits of the drainage infrastructure in the village; The quality of the roads in and out of the village; The need for Affordable Housing in the village; The high proportion of second homes already in the village. As a village with over 40% of houses either second homes or holiday homes, this has a huge impact on the sustainability of the village.</p> <p>Statutory Bodies & Organisations: (LP803) Hopkins Homes comments that Weybourne is constrained by being within the AONB and location within the setting of Sheringham Park. Based on a lack of available or suitable sites, low developer interest and environmental constraints, it should be concluded that Weybourne (along with 7 other villages listed) is poorly placed to deliver any meaningful growth towards the minimum 400 home target set for the Small Growth Village tier.</p>
<p>Services/facilities review: no changes.</p> <p>Constraints: no changes. It is noted that the northernmost alternative site WEY13 and WEY02/A fall partly within flood zones 2 and/or 3a.</p> <p>Land Supply: As part of the Call for Sites & HELAA, 6 sites have been recorded as alternative sites for housing development and 5 additional sites have been submitted under Regulation 18.</p>
<p>Conclusion: Weybourne continues to meet the criteria as a SGV.</p>

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Appendix 2 Emerging Policies (Discussion Draft)

Policy SD3 Settlement Hierarchy

The majority of new development in North Norfolk will take place in and close to the towns and larger villages, dependent on their local housing and other development needs, their role as employment, retail and service centres, and identified environmental and infrastructure constraints. New development sites will be allocated close to the defined selected settlements in accordance with the following hierarchy:

North Walsham, Fakenham, and Cromer are defined as **Large Growth Towns** where the majority of new commercial, residential and other types of development will take place. Holt, Hoveton, Sheringham, Stalham and Wells-next-the-Sea are defined as **Small Growth Towns** in which a more limited amount of additional development will be accommodated.

The distribution of development will also have regard to the complementary roles played by Cromer, Holt and Sheringham in the central part of North Norfolk.

A lesser amount of new development will be focused in the **Large Growth Villages** of Briston & Melton Constable, Mundesley, Ludham, and Blakeney, recognising their role as local service centres and to support rural sustainability.

Small-scale developments⁽¹⁾, including brownfield developments, community facilities, **self-build** and services will be permitted ~~within the defined boundaries~~ **in the following small growth village locations, as defined on the policies map** of the following **Small Growth Villages**:

Aldborough, Bacton, Badersfield, Binham, Catfield, Corpusty & Saxthorpe, East Runton, Happisburgh, High Kelling, Horning, ~~Langham~~ Little Snoring, Little Walsingham, Overtstrand, *Potter Heigham*, Roughton, Sculthorpe, *Sea Palling*, Southrepps, Sutton, Trunch, *Walcott*, West Runton and Weybourne.

Within the defined development boundaries of the **Selected Settlements**, development proposals which accord with the land use designations shown on the Policies Map and the associated policies will be supported. In designated **Residential Areas** appropriate residential development and compatible non-residential development including small scale business, community, leisure and social uses will be permitted. **In Small Growth Villages appropriate residential development will be permitted where all of the following criteria are satisfied:**

1. The development is of an appropriate scale and design to the settlement;
2. Is located inside the settlement boundary or immediately and functionally adjoining;
3. Does not result in the number of dwellings in the settlement increasing by more than 6%²
4. The design contributes to preserving and enhancing the historic nature of the settlement
5. Incorporates improved connectivity to the village and wider GI network.
6. There is demonstrable clear local community support*.

Outside defined development boundaries in areas designated as **Countryside** residential development will be **limited** and permitted only where it accords with other policies in this Plan, and **if all of the following criteria are satisfied:**

1. The site comprises of previously developed land;
2. ~~The proposal is for small scale development of typically no more than five dwellings; and~~
2. The proposal is for an appropriate scale and design where no significant harm would be caused to the character or setting of the settlement and surrounding countryside; and

¹ Up to 1ht in size

² From date of adoption / number of dwellings inside the defined settlement boundary

Appendix 2 Emerging Policies (Discussion Draft)

3. Development of the site would result in infilling or rounding off in a predominantly built up area with suitable access to an existing highway.

The rest of North Norfolk, including farmsteads, sporadic groups of dwellings and all settlements not listed above, will be designated as **Countryside** and development will be restricted to particular types of development in accordance with **Policy SD 4 'Development in the Countryside'**.

*demonstrable community support means that at the point of submission of a planning application to the LPA there should be clear evidence of local community support for the scheme, generated through pre application community consultation and support from the applicable parish council.

Policy SD 4 Development in the Countryside

In areas outside of the defined development boundaries and designated as **Countryside** development will be limited to that which complies with the Policies of this Plan and is for one or more of the following:

1. Use and development of land associated with agriculture or forestry;
2. ~~the extraction of minerals and disposal of waste in accordance with the Minerals and Waste Local Plans;~~
3. The provision of infrastructure including, but not limited to, roads, drainage, coastal and flood protection, power including renewable energy, and development by statutory undertakers, utility and telecommunications providers;
4. Affordable homes, replacement dwellings, sub division of dwellings, **key workers**³ accommodation, and temporary and permanent accommodation for gypsies and travellers;
5. Community facilities and services and community led developments;
6. Recreation and tourism;
7. Extensions to existing dwellings and businesses;
8. **Policy compliant** re-use of existing buildings;
9. new employment generating development, specialist accommodation for the elderly infirm and others requiring care, where there is a demonstrable need for the development and where alternative sites within adopted development boundaries are shown not to be available or suitable.

Policy SD 2 Community-Led Development

The Council is supportive of Community-Led Development. This may include schemes involving affordable housing, community shops, pubs, allotments, gardens, play areas, orchards, small business units, renewable energy generation and other uses where it is demonstrated that the proposal will contribute positively to the vitality and viability of the community as a whole.

Proposal (s) will be supported provided:

1. There is evidence that the proposed development is needed to support the vitality and viability of the community; and,

³ As detailed in HOU4

Appendix 2 Emerging Policies (Discussion Draft)

2. No significant harm would be caused to the character or setting of the settlement and the surrounding countryside; and,
3. The scale of the scheme is appropriate to the location; and,
4. The Council is satisfied that:
 - a. the scheme was initiated by, and is being led by, a legitimate local community group such as a Parish Council or **constituted** Community Land Trust; and,
 - b. The scheme has ~~general~~ **demonstrable** community support as evidenced by meaningful public engagement*; and,
 - c. It is demonstrated that the scheme will be well managed and ~~financially viable~~ **effectively managed** over the ~~long-term~~ **lifetime of the development** and that any benefits provided by the scheme can be retained by the local community in perpetuity **and would be significantly greater than would be delivered on an equivalent open market site.**

Where housing is proposed, an element of open market housing on the site will only be acceptable where:

1. ~~It is demonstrated through a financial appraisal that this is essential to enable the delivery of affordable housing or other community benefits on the site and the community benefits of the scheme (such as the level of affordable housing or open space) are significantly greater than would be delivered on an equivalent open market site.~~ **It is clearly demonstrated to be the minimum necessary in order to deliver affordable dwellings which would not otherwise be provided, and in all cases the majority of the homes provided are affordable.**

***demonstrable community support means that at the point of submission of a planning application to the LPA there should be clear evidence of local community support for the scheme, generated through pre application community consultation and support from the applicable parish council and in the case of Neighbourhood planning an adopted Plan.**

Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing)

Affordable Homes in the Countryside (Rural Exceptions Housing) Proposals for affordable housing development within the designated Countryside Policy Area will be permitted where they comply with all of the following criteria:

1. The proposal would help to address a proven local housing need for affordable housing as demonstrated in up to date evidence;
2. The site is physically well related to a built up part of a settlement and the facilities it provides;
3. The affordable housing provided is made available solely to people in local housing need at an affordable cost for the life of the property (the Council will ensure that any planning permission granted is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity);
4. ~~The size of the scheme takes account of the level of local need and does not usually result in more than a 5% increase in the number of homes in the settlement;~~
5. **The scheme is of a scale and design appropriate to its immediate surroundings and is sympathetic to the local area;** and
6. Where market housing is included within proposals it is clearly demonstrated to be minimum necessary in order to deliver affordable dwellings which would not otherwise be provided, and in all cases the majority of the homes provided are affordable.

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For the purposes of this policy 'local housing need' means the need in the Parish and ~~adjacent~~ **adjoining** Parishes as evidenced by the most up to date evidence.

In addition, further text is proposed to be added to the justification for reasons of clarity. To facilitate the delivery of such schemes, the LPA will consider whether allowing a limited amount of market housing would be appropriate, taking into account the location of the site, the degree of need for affordable housing and infrastructure requirements and any excessive development costs due to constraints. In such cases, clear evidence of viability will need to be provided demonstrating that there are excessive development costs due to site constraints, and that any additional revenue created by the inclusion of open market housing is essential to the delivery of the affordable housing proposed.

Policy SD 6 Provision & Retention of Local Facilities and Services

New or improved community facilities or services will be permitted within the **Selected Settlements** or within the designated **Countryside** where they meet the identified needs of the local community.

Development proposals that would result in the loss of premises currently, or last used for, important local facilities and services* will not be permitted unless:

1. Alternative provision of equivalent or better quality is available in the vicinity or will be provided and made available prior to commencement of redevelopment; or
2. It can be demonstrated that there is no reasonable prospect of retention of the facility or service; and if it is a commercial operation it has been marketed for a period of at least 12 months, a viability test has demonstrated that the use is no longer viable and that all reasonable efforts have been made to sell or let the property at a realistic market price**

Development proposals on designated **Health and Social Care Campuses** as identified on the **policies map** at Cromer, Fakenham, High Kelling, North Walsham and Wells-next-the-Sea that would otherwise accord with Development Plan policies but would result in the loss of health care facilities will not be permitted unless the proposal enables the delivery of a replacement facility of equal or greater community benefit in that locality before an existing facility is lost.

*Important local facilities and services include a primary school, convenience store, bank, post office, public house, petrol filling station, public hall or indoor sports facility, theatres and cinemas and other cultural facilities and small scale health care facility where the facility is within the Countryside or is the last of its kind within a selected settlement in the settlement hierarchy.

** Demonstrated as commercial market price by local valuer to the satisfaction of the Council

Appendix 2 Emerging Policies (Discussion Draft)

Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation

Development ~~to~~ **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:

1. The intended occupants meet the definition of Gypsies and Travellers*, or the description of travelling showpeople**;
2. Development minimises impact on the surrounding landscape;
3. Safe vehicular access to the public highway can be provided **and the development can be served by necessary utilities infrastructure**;
4. The movement of vehicles to and from the site ~~and~~ **will not result in any unacceptable impact on the capacity of the highway network**;
5. There is adequate space for parking, turning and servicing on site;
6. 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; and,
7. Suitable landscaping ~~and~~, boundary enclosures **and screening** are provided to give privacy, minimise **impact on the character and amenities** of the surrounding area **and neighbouring settled community** ~~on the surrounding area, and provide a safe and acceptable living environment.~~
8. **Proposals should include any additional uses intended to be carried out from the site.**

Conditions will be used to control the nature and level of non- residential uses on the site.

*Circular 01/2006 defines Gypsies and Travellers as 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such'.

** Consultation on revised planning guidance for Travelling Showpeople, DCLG Jan 2007 defines travelling showpeople as 'Members of an organised group of travelling showpeople or circus people (whether or not travelling together as such). They include such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excluding Gypsies and Travellers'.

Policy HOU 4

Agricultural & Other Key Worker Accommodation

Proposals for development in the designated **Countryside Policy Area** to meet the housing needs of full-time workers in agriculture, forestry and other essential **key** workers connected with that land **who need to live at or near their place of work** will be permitted where they comply with all of the following criteria:

1. There is a demonstrated essential need for one or more full time workers to be readily available **on site** at most times for the enterprise to function properly;
2. The functional need cannot be met by another existing dwelling on the site of the enterprise, or in the immediate vicinity **and where practicable and appropriate, first consideration is then given to the sub-division or conversion of an underused or redundant building**;

Appendix 2 Emerging Policies (Discussion Draft)

3. The enterprise has been established for at least three years and is, and is likely to remain, financially viable;
4. The proposal does not represent a replacement for another dwelling on the site which has been sold on the open market in the last five years; and,
5. The proposed dwelling is no larger than that required to meet the functional needs of the enterprise, nor unusually expensive to construct in relation to the income that the enterprise would sustain in the long term.

Where accommodation is required in relation to a newly created enterprise, where there has been insufficient time to demonstrate financial soundness, permission may be granted for a temporary dwelling in the form of a caravan or wooden structure which may easily be dismantled and removed from the site.

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Appendix 3 - Consultation Feedback Summaries

SD2 - Community-Led Development

Individuals	Number Received	Summary of Responses (Policy SD2)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy, Community led development should be subject to the same scrutiny as any development. Consideration in favour of these developments would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy.
Summary of General Comments	0	None received
Overall Summary		No substantial comments received or issues raised. Community led development should be subject to the same scrutiny as any development. Consideration in favour of these developments rather than those of external developers would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy.
Council's Response		Noted, giving communities a greater say and control in planning is a central aim of government policy. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD2)
Objection	0	Approach endorsed.
Support	1	
General Comments	0	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD2)
Objection	1	The principle of community led development (through neighbourhood plans) was supported. Clarification was sought on the extent of community support with some organisations seeking amendments to the approach around the inclusion of estate masterplans, greater recognition and endorsement of market housing in rural areas, recognising the contribution to sustainable development and the use of Housing needs assessments in demonstrating need, and hence support in rural areas.
Support	4	
General Comments	3	

SD3 - Settlement Hierarchy

Individuals	Number Received	Summary of Responses (Policy SD3)
Summary of Objections	40	The majority of respondents objected to growth in the Small Growth Villages and the Countryside. Housing development should be focussed where there is appropriate infrastructure, public transport, healthcare and other services including employment and the approach fails to integrate problems of climate crisis. many suggested that rather than allocating in these villages, development should be allowed on infill and brownfield sites. Concerns that the countryside is under constant threat of being developed; having an adverse effect on wildlife and dark skies etc. Others though objected that due to concerns that the Plan doesn't go far enough and should be

Individuals	Number Received	Summary of Responses (Policy SD3)
		<p>promoting limited development in settlements not currently designated for growth, in order to enhance and maintain the vitality of rural communities. Suggest that Bodham, Edgefield and Northrepps are identified as suitable Small Growth Villages. Suggest amending the policy to remove reference to PDL and allow small scale development on greenfield land or vacant derelict sites. Also suggested removing the wording 'Outside defined development boundaries...' altogether. More consideration should be given to provide housing for local people with families within a 3 mile radius.</p> <p>One objection promotes the alternative option to provide new settlements and new roads instead. Raise concerns around Large Growth Town designations, specifically; Cromer, Fakenham, North Walsham. Small growth town designations, specifically; Hoveton, and Wells-next-the-sea. Large Growth Villages ;Briston & Melton Constable, Mundesley. And Small Growth Villages; Bacton, Happisburgh, Langham , Little Snoring, Southrepps, Trunch, Walcott. See specific settlement summary below. Suggest change to bullet point 7.20 'reduce' with 'minimise'.</p>
Summary of Supports	10	<p>Support the principle of development being targeted in designated settlements and recognises the benefits of allocating land immediately adjacent to built up areas. Growth most required where there are employment and services. Development in rural locations would generate additional car journeys. Suggested amendments to remove reference to PDL and allow small scale development on greenfield land or vacant derelict sites. Development should only commence when capacity at Schools, Doctors, Dentists is ensured. Support the identification of Briston as a large growth village.</p>
Summary of General Comments	15	<p>Most comments recognised that this is an appropriate strategy and is overall consistent with national policy resulting in sustainable development. General understanding of the need for housing and the policy is reasonably well argued. Housing should be located near to shops, schools, employment and public transport. One comment states that accepting development of 0 - 10 dwellings will have same impact as 100 houses but will not contribute towards local infrastructure or to the wider community. Suggest amendments to allow small scale new build on greenfield sites subject to occupancy restrictions. others raised concerns around Small Growth Town designations, specifically; Holt and Wells-next-the-sea and Small Growth Village Weybourne. See settlement summaries below. The exclusion of a site / Beeston was challenged on the basis of the 2017 HELAA assessment and its non inclusion as a selected settlement.</p>
Overall Summary		<p>A number of comments received to this policy. Key issued raised focused on: In order to meet environmental objectives, development should be focused where appropriate infrastructure, services, public transport and employment are in place and there is a specific housing need and the overall support for focussing development in Large Growth Towns, which are the largest most sustainable and able to accommodate growth. One representation disagrees and considers that the town infrastructures will be unable to cope and a more appropriate option would be to build a new settlement. There was some support for growth in villages, to address housing need and maintain vitality of rural communities. One representation questions whether small growth villages can accommodate the proposed growth without site-specific constraints being considered. In the main, it is considered that villages are unsuitable locations for growth. There is no local demand and limited employment or services. There is strong support for provision of affordable housing in villages, and for the protection of village character and green gaps between settlements. Many consider that allocating development in Small Growth Villages will have a knock on effect on the delivery of rural exception affordable housing schemes and a preference was expressed for small scale and suitable infill development coming forward. On the other side, some consider that growth in Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites.</p>
Large Growth Towns		<p>Overall support for focussing development in Large Growth Towns, which are the largest most sustainable and able to accommodate growth. One representation disagrees and considers that the town infrastructure will be unable to cope and a more appropriate option would be to build a new settlement and roads.</p>
Cromer		<p>Concerns relate to Cromer's status a Large Growth Town, mainly due to the landscape constraints encompassing the town.</p>

Individuals	Number Received	Summary of Responses (Policy SD3)
Fakenham		Concern expressed about the impact of major residential growth in respect of the lack of employment opportunities and services available.
North Walsham		One representation raises concern over the ability of North Walsham to accommodate growth due to the current volumes of traffic and the car parks being full. Concerns expressed about the capacity of doctors and dentist.
Hoveton		Concern about Hoveton's proposed Small Growth Town status (when it is a village) adding to the current heavy volumes of traffic experienced in the village and the resulting congestion, air quality issues. Concerns also expressed about the adequacy of education, health provision. Concerns over surface water, flooding and foul water drainage.
Sheringham		One comment considered Sheringham as suitable to accommodate growth as it has a wide range of services and amenities.
Wells		Agrees with Well's status of a Small Growth Town but should be recognised that the town has a finite capacity.
Briston		Concern raised about Briston's Large Growth Village Status, increasing traffic, especially by school and the impact on the character of Briston – development could lead to identical overdeveloped villages in a location where tourism is important. Concerns expressed about the capacity at doctors.
Small Growth Villages		feedback suggested that villages are unsuitable locations for growth. There is no local demand and limited employment or services. There is strong support for provision of affordable housing in villages, and for the protection of village character and green gaps between settlements. Many consider that allocating development in Small Growth Villages will have a knock on impact on the delivery of rural exception affordable housing schemes. Happy with small suitable infill development. On the other side, some consider that growth in Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites and other settlements should also be promoted
Bacton		Objection to Bacton status as a Small Growth Village due to impact development could have on the character of the village which historically has a 'scattered or 'dispersed' settlement pattern. Express concerns about the adequacy of infrastructure, public transport and traffic and associated pollution. Difficulty getting to doctors, schools and shops. Parking and a bypass of the old part of the village is needed before development is built. Issue with the number of second homes and impact on housing affordability.
Happisburgh		Concerns expressed about the adequacy of infrastructure, public transport and traffic. Along with issues of the number of second homes and housing affordability.
Mundesley		Concerns expressed about the adequacy of infrastructure and services which are at capacity. Issues with traffic and housing should be affordable.
Northrepps		Propose Northrepps as Small Growth Village.
Little Snoring		Lack of services and facilities, public transport, issues with road network, broadband nearing capacity, Limited capacity at WasteWater treatment works. Important to preserve rural character and green space. Would impact wildlife.
Langham		No shop or post office.
Southrepps		Will lose identities, strain on road network, impact on wildlife, lack of public transport. Located in AONB. Would impact on quality of life for residents. Create light and noise pollution. Development in Mundesley will impact Southrepps. Respondents were against the identification of Southrepps as an infill village
Trunch		Low water pressure in village. Important Conservation Town. Limited facilities
Walcott		Concerns expressed about the adequacy of infrastructure, public transport and traffic. Along with issues of the number of second homes and housing affordability.
Weybourne		No public transport for working people, lack of services, new homes unaffordable to local people. Negative impact on AONB and wildlife. Parking inadequate
Alternatives		Bodham, Northrepps, Edgefield promoted as Small Growth Villages. Fails to recognise the settlements that are within close proximity to higher order settlements. Weybourne, Southrepps, Bacton, Walcott, Happisburgh should not be identified settlements. Alternatively put forward include, reintroduce settlement boundaries around the non-growth settlements that are currently misleading designated as 'countryside'.
Council's Response		Noted: Consider comments in the finalisation of the policy. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural

Individuals	Number Received	Summary of Responses (Policy SD3)
		economy, the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated impacts on countryside will be reviewed in line with feedback evidence of need and the potential impacts on affordable housing provision.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD3)
Objection	5	Issues raised include more clarity around meaning and quantities around infill development. The following PC/TC's objected to being identified as small growth villages: Bacton, High Kelling, Roughton & Southrepps & Weybourne reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small scale allocations run the risk of disproportionate and unsustainable growth. One parish council requested more information on housing need methodology and that more support should be given to small growth towns for the retention and provision of services.
Support	0	
General Comments	2	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD3)
Objection	9	Key issues raised: a) The requirement to locate growth in the identified the sustainable settlements in the AONB was commented on and organisations such as Natural England, Norfolk Coast partnership, advised that supporting documentation such as the SA and HRA should justify site selection (and distribution - our emphasis) on the least environmental or amenity value and site selection should avoid most versatile agricultural land protected landscapes. b) General support for growth in smaller rural settlements, but for many different reasons, land owners and promoters supported larger scale growth especially in higher valued areas in order to support rural economies and their development needs and sought the removal of the overall prescriptive and restrictive cap in footnote 21 as well as suggesting a number of further settlements which the council should include in the settlement hierarchy e.g. Great Ryburgh and some provided reasoning for the exclusion of others including recognising their commercial interests and hence marketability of settlements , others however used the opportunity to support the identification of smaller villages as in the policy through expressing support and analysis of service provision and local connections. Others expressed concern and sought lower numbers due to concerns around landscape impact and estate housing. c) Those promoting estate management sought more flexibility and a policy commitment facilitating appropriate estate growth and the recognition of the role larger estates make to the District d)The principle of broadly focussing growth in and close to the larger settlements was generally supported, however the challenge was again to ensure the Plan facilitates appropriate levels of growth in the correct locations with commentary closely linked to HOU1 and the Plans deliverability of substantial growth at North Walsham. Some commentary supported a more flexible approach seeking the Plan to adopt a more flexible approach to longer term growth and support development by allowing for residential development adjoining or close to the existing built up confines of [list settlements] will be acceptable provided that a set of criteria was met and one respondent commented that the reliance on the provision of key services to identify settlements for growth was an over simplification of reality and promoted the wider contribution surrounding villages could make subject to a review of accessibility and transport network. e) The high reliance on windfall in the strategy and the longer delivery expectations of the large growth towns was used to help justify responses around more flexibility around the approach to large and medium growth towns and the identification of a greater number of selected settlements. One larger urban extension was proposed crossing Into Broadland District Council at Coltishall and the village of Badersfield.
Support	12	
General Comments	7	

SD4 - Development in the Countryside

Individuals	Number Received	Summary of Responses (Policy SD4)
Summary of Objections	2	This policy received two objections. Suggest changes to policy to allow for low carbon development in the countryside including small scale greenfield infill sites for permanent residence, low carbon small scale sustainable projects, 'eco-tourism' holiday lets, Low carbon Self and Custom Builds. Suggest that NNDC works with farmers to support organic farming where possible and should not allow permission for factory farms.
Summary of Supports	2	Two support this policy. Consider that the general presumption against development in the Countryside is the right approach to sustainable development in North Norfolk. But appropriate development should be allowed to ensure that the rural economy is preserved.
Summary of General Comments	1	One comment received. Allow more small scale development in rural villages to meet local demand by committing to do so on a case by case basis rather than linkage to specified available facilities.
Overall Summary		No substantial issues raised, consider that the general presumption against development in the Countryside is the right approach to sustainable development in North Norfolk. However others suggested that more small scale development is allowed in rural villages to meet local demand. Suggest that the policy should allow for low carbon development in the countryside including small scale greenfield infill sites for permanent residence, low carbon small scale sustainable projects, 'eco-tourism' holiday lets, Low carbon Self and Custom Builds.
Council's Response		Comments noted: The Local Plan supports the transition to a low carbon future and included policies throughout the plan to allow appropriate development in countryside locations in line with the approaches envisaged in national policy. Paragraph 79 in the NPPF also allows for exceptional development proposals in the countryside subject to truly outstanding and innovative design which also enhances the setting .

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD4)
Objection	0	This approach was strongly supported, 1 PC questioned the effectiveness of the policy given the number of exceptions.
Support	4	
General Comments	1	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD4)
Objection	1	General support expressed but suggest that their needs to be some development necessary to ensure rural communities prosper in a sustainable way. The view that growth should only be promoted in the countryside in order to meet identified need was promoted by some, others sought the provision of a policy or specific wording to support estate management and the contribution they bring to sustainable development. The development industry sought greater flexibility and a more positive approach to growth (rather than restrictive). Norfolk coastal partnership are concerned around the potential impact of business extensions and wish further consideration given to the requirement for a landscape Visual impact assessment in the policy. Norfolk County council, Mineral and waste team requested that bullet point 2 be removed in its entirety.
Support	3	
General Comments	5	

SD6 - Provision & Retention of Local facilities and Services

Individuals	Number Received	Summary of Responses (Policy SD6)
Summary of Objections	2	This policy received two objections. Suggest amendment to policy to make it tougher for pubs and shops to change use. Health Care Campus are not shown on the Proposals map.
Summary of Supports	1	One supports this policy for the protection of community facilities but considers that the retention of these facilities can only be sustainable if their costs are sustainable and customer base is retained.
Summary of General Comments	0	None received.
Overall Summary		No substantial issues raised. Overall support for protecting community facilities, suggest amending the policy to reference change of use and make it tougher to change pubs and shops. Health Care Campus are not shown on the Policies Map.
Council's Response		Noted Consider comments in the finalisation of the policy. Local facilities considered important are detailed in footnote 16. The change of Use between Use classes is governed by the Use Classes order. Ensure the identification of Health care campuses on the policies mapping

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD6)
Objection	0	Sheringham town council requested the consideration for a health and social care campus. No comments were received on the principle of protection of such sites.
Support	0	
General Comments	1	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD6)
Objection	0	Responses supported the inclusion of a policy and the strong protection given to local facilities and services. The Boards Authority suggested the approach may be too permissive.
Support	2	
General Comments	2	

HOU3 - Affordable Homes in the Countryside

Individuals	Number Received	Summary of Responses (Policy HOU3)
Summary of Objections	1	Objection concerned that a bespoke rural exception policy should be set for Wells -next -the Sea.
Summary of Supports	2	conditional support for this approach- Development should be well related to settlements with facilities and are not just a cluster of private dwellings and have the support of the local community and clarification of facilities.
Summary of General Comments	0	None received.
Overall Summary		Limited number of comments received on this policy. Clarity is sought over the definition of 'facilities' and the requirement for proposals to be well related to settlements with local facilities and how housing need will be calculated.
Council's Response		Noted - No substantial issues raised, consider comments in the finalisation of the policy. Clarity over the definition of 'facilities' and how housing need should be demonstrated. Consider restricting policy to those settlements with a level of service provision. Wells is identified as a small growth town and as such the exceptions approach detailed actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need. The Council and other policies support the delivery of growth to address local needs through neighbourhood planning and through community land trusts brought about through community planning powers. As an exception to planned development occupation is limited to those that meet the Councils local occupancy policy i.e. those that have a strong connection to the local community in perpetuity.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU3)
Objection	0	Broad support expressed for this approach.
Support	1	
General Comments	1	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU3)
Objection	0	The approach that delivers additional housing opportunities for affordable housing in the countryside and flexibility to the spatial strategy was supported. some respondents suggested that the policy should be more prescriptive on the tenure of homes to be allowed, while other sought clarification that growth would not exceed identified local need
Support	6	
General Comments	1	

HOU4 - Agricultural & Other key Worker Accommodation

Individuals	Number Received	Summary of Responses (Policy HOU4)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy; restrictions should be in place to restrict these houses being sold for other purposes/ second homes.
Summary of General Comments	0	None received
Overall Summary		Support this policy; restrictions should be in place to restrict these houses being sold for other purposes/ second homes.

Council's Response		Comments noted. The council will impose a restrictive occupancy condition to ensure the that any dwelling remains available to meet the needs of the particular business
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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU4)
Objection	0	Broad support expressed but the approach could be expanded to cover key workers first in the towns and not just focus on those connected to the land.
Support	1	
General Comments	0	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU4)
Objection	0	Limited feedback received - No issues raised. Consideration of some amended wording with regard to landscape and designated sites was suggested.
Support	1	
General Comments	1	

HOU5 - Gypsy, Traveller & Travelling Showpeople's Accommodation

Individuals	Number Received	Summary of Responses (Policy HOU5)
Summary of Objections	0	None received
Summary of Supports	1	One support for this policy.
Summary of General Comments	0	None received
Overall Summary		No substantive issues raised
Council's Response		Noted

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU5)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU5)
Objection	0	No comments received.
Support	0	
General Comments	0	