

North Norfolk Local Plan Examination

Mark Ashwell
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26 June 2023

Dear Mr Ashwell

NORTH NORFOLK LOCAL PLAN EXAMINATION

As you are aware, I have been appointed to examine the North Norfolk Local Plan (NNLP) and have commenced initial preparation. Thank you for supplying hard copies of various documents, I shall make requests for any further documents through the programme officer.

I am seeking to raise some initial points at the earliest opportunity and to seek clarification of others to aid understanding. There may be more in due course to help inform the matters, issues and questions document which will be prepared for the hearing sessions. I am also requesting some work to update the housing figures for the benefit of the examination.

1. The NPPF states that strategic policies should look ahead for a minimum 15-year period from adoption. In this case, the plan proposes an end date of 31 March 2036. No doubt partly due to the delay in submitting the Regulation 19 plan, even if adoption was achieved by April 2024 there would only be 12 years remaining. With a fair wind adoption is more likely sometime during the period 2024/5. Whilst not pre-empting the matter, as this issue will need to be discussed at the hearings, the Council is requested to consider the implications of extending the plan period by at least three years, to March 2039 or March 2040. At the same time the base date of the plan could be rolled forward to 2021. Based on such a scenario and taking account of the requests in 4 and 6 below, please prepare revised figures for Policy HOU1, the housing trajectory on pages 263-265 and the detailed breakdown on pages 266-267 using the Council's preferred housing target figure of 480 dwellings per annum (dpa). What would be the implications for housing provision?
2. The updated trajectory figures should also be used to demonstrate the five-year housing land supply position on adoption of the plan as at April 2024 or April 2025.
3. The Habitats Regulations Assessment (HRA) by Footprint Ecology (document A4) is dated December 2021, prior to the letter dated 16 March 2022 from Natural England regarding nutrient pollution. The report from Royal Haskoning (RH) dated April 2023 states it has not been agreed or endorsed by Natural England and does not purport to be an HRA. Clearly an updated HRA is required to take this issue on board. An agreed Statement of Common Ground (SoCG) with Natural England should also be prepared. When might these be made available for the examination?
4. The RH report states that 1,317 dwellings in North Norfolk are 'held up' due to nutrient neutrality, and that NNLP growth of 3,753 dwellings is 'held up'. Please supply the analysis that supports these figures. Which allocations, small site assumptions and

permissions are affected? What assumptions are now made in the updated figures and trajectory requested in (1) as to any delay in the delivery of these dwellings?

5. Please provide a detailed plan of the catchment areas affected in North Norfolk.
6. The Council's latest published five-year housing land supply position is dated April 2020 (K6) whilst Policy HOU1 and pages 263-267 have a base date of April 2021 and the latest monitoring report (K1) has a base date of April 2022. For the examination to be based on the most up to date information priority should be given to providing updated housing monitoring figures with a base date of April 2023. When might such figures be available? At the very least the updated policy and trajectory requested in (1) should be based on April 2022 figures and preferably those from April 2023 to avoid new figures emerging mid-examination.
7. The position of the Council to plan for a minimum of 480 dpa on the basis of the 2016 based household projections is noted and will be an important matter for discussion at the hearings. Without prejudice, do you agree the Home Builders Federation figure of 531 dpa from use of the standard method (2014 based projections) and the latest affordability ratio as at January 2022? If so, for discussion/information purposes, please also undertake the exercise in 1 above using the 531 dpa figure. What would be the implications for housing provision?

When you have had a chance to consider this letter could you please advise when you might be able to respond to the various points and provide the necessary updated evidence. I will then be able to consider how the examination might progress.

In order to maintain transparency and assist other participants, please place a copy of this letter and your response(s) on the examination website.

Thank you for your assistance.

Yours sincerely

David Reed

INSPECTOR