

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

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

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

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

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

1. Purpose of the report

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

2. Introduction & Background

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

Para 48

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

Para 219

In addition to the above the NPPF states that:

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

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

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

Para 49.

2.2 Paragraph 50 goes on to state:

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

- 2.3 To date only limited weight has been attributed to the emerging Local Plan as a whole. Advice has remained that relevant decision-making reports make reference to the emerging Plan depending on the circumstances of any relevant application and the degree of reliance on the emerging policies. Where specific policies have been relied upon by an applicant weight has only been given on a case-by-case basis having regard to paragraph 48 of the Framework and the level and nature of any objection. With the Plan now submitted for examination, Members have a choice in line with NPPF para 48 (a), to place greater emphasis on the emerging Plan and its individual policies in line with para 48 (b) and (c). or to continue to rely on the Core Strategy.
- 2.4 The emerging Local Plan was submitted to the Secretary of State on 11th May 2023 and the examination is expected to commence late Summer/ Autumn 2023. The Plan contains 50 policies and 28 site proposals and one overarching policy that seeks to allocate the sites. The Plan once adopted will replace the Core Strategy, 2008 and the Site Allocations DPD, 2011, and sets out the long-term vision and strategy for how our towns, villages and the countryside for North Norfolk will develop and evolve. In short, the Plan sets out the strategic planning framework with the land use policies and development proposals which provide the foundations to guide, support, and deliver sustainable and climate resilient development in North Norfolk through planning decisions over the next 20 years.
- 2.5 With its submission for independent examination the Plan is considered to be at an advance stage and has undergone Sustainability Appraisal and Habitat Regulation Assessment. It has followed a number of stages as set out in the regulations including consultation. It has been produced in collaboration with input from local communities, developers and guided by cross party Members through the Planning and Build Heritage Working Party. Many of the policies update the approaches in the Core Strategy and align with the overall Council's objectives of climate resilient sustainable development while being consistent with the NPPF. Some policies, however, are contested through the recent Regulation 19 consultation and in line with para 48 b) there remain unresolved objections. While some of these are judged to be of some significance and as such will need to be resolved through the examination others are seen as less significant comments / objections. Appendix 1 sets out the overarching summary of officer's assessments of the degree of

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

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

3. Proposals and Options

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Corporate Priorities

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

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

5. Financial and Resource Implications

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

6. Legal Implications

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

7. Risks

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

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

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

8. Net Zero Target

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

9. Equality, Diversity & Inclusion

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

10. Community Safety issues

N/A

11. Conclusion and Recommendations

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

Recommendation

To recommend to Cabinet that;

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

Appendix 1: Proposed Policy Weight Review - PPBHWP

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

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

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

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

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

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

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