



16 August 2024

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

Dear Mr Reed,

NORTH NORFOLK LOCAL PLAN EXAMINATION

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

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

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

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

Plan Period

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

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

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

Local Housing Need

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

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

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

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

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

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

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

Five Year Housing Land Supply

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

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

Allocations being made in the Plan

CROMER

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

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

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

Land at Clifton Park (C10/1)

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

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

FAKENHAM

Land North of Rudham Stile Lane (F01/B)

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

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

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

NORTH WALSHAM

Land West of North Walsham (NW62/A)

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

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

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

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

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

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

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

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

Land East of Bradfield Road (NW52)

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

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

WELLS-NEXT-THE-SEA

Land Adjacent Holkham Road

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

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

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

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

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

SHERINGHAM

Former Allotments, Weybourne Road, Adjacent The Reef

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

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

HOVETON

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

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

LUDHAM

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

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

The Small Growth Villages Policy

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

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

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

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

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

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

2. 'adjacent developable land' relates to land all in the same ownership.
3. 'local Registered Providers' that are active in the area.
4. 'agreed terms' relates to the terms agreed with the Local Authority.

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

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

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

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

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

Windfall sites that arise during the plan period

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

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

Housing Provision - Way Forward

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

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

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

Employment Land

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

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

Gypsy, traveller and travelling showpeople's accommodation

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

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

Action Plan

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

1. Gypsy, traveller and travelling showpeople's accommodation

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

2. The Small Growth Villages Policy

Pending officer review and member endorsement:

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

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

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

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

Timeline

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

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

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

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

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

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

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

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

Yours sincerely

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