

Planning Policy & Built Heritage Working Party



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14 July 2017

A meeting of **Planning Policy & Built Heritage Working Party** will be held in the **Council Chamber** at the Council Offices, Holt Road, Cromer on **Monday 24 July 2017 at 10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours.

Members of the public who wish to ask a question or speak on an agenda item are requested to arrive at least 15 minutes before the start of the meeting. It will not always be possible to accommodate requests after that time. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public. Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516010, Email: democraticservices@north-norfolk.gov.uk

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

Emma Denny
Democratic Services Manager

To: Mrs S Arnold, Mrs J English, Ms V Gay, Mrs P Grove-Jones, Mr N Pearce, Mr J Punchard, Mr R Reynolds, Mr S Shaw, Mr N Smith, Mrs V Uprichard, Vacancy

All other Members of the Council for information.
Members of the Management Team, appropriate Officers, Press and Public



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

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

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AGENDA

1. APOLOGIES FOR ABSENCE

To receive apologies for absence, if any.

2. PUBLIC QUESTIONS

3. MINUTES

Page 4

To approve as a correct record the Minutes of a meeting of the Working Party held on 19 June 2017.

4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

5. DECLARATIONS OF INTEREST

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest.

6. STRATEGIC HOUSING MARKET ASSESSMENT 2017

page 10

Summary: Provides a summary of the main findings of an updated Strategic Housing Market Assessment which takes account of the most recent national household projections to determine the number of dwellings that are likely to be needed in the District over the period 2016 -2036.

Conclusions: That the Objectively Assessed Need for new dwellings in North Norfolk is currently 409 dwellings per annum.

Recommendations:

- 1. That the Central Norfolk Strategic Housing Market Assessment 2017 is published.**
- 2. That the figure of 409 dwellings per year is used for the purposes of preparing five year land supply statements pending the identification of a housing target in the new North Norfolk Local Plan.**

Cabinet Members(s): Cllrs S Arnold & R. Price	Ward(s) Affected: All
Contact Officer(s), telephone number and email: Mark Ashwell 01263 516325, mark.ashwell@north-norfolk.gov.uk	

7. ANNUAL FIVE YEAR LAND SUPPLY STATEMENT

page 13
(Appendix 1 – page 17)

Summary: Provides an overview of the quantity of housing land which is assessed as being deliverable over the five year period commencing April 2017.

Conclusions: That the Council demonstrates 6.57 years of housing land supply.

Recommendations: **That the Five Year Land Supply Statement 2017 is published.**

Cabinet Members(s): Cllrs S Arnold & R Price	Ward(s) Affected: All
Contact Officer(s), telephone number and email: Mark Ashwell 01263 516325, mark.ashwell@north-norfolk.gov.uk	

8. NEIGHBOURHOOD PLAN GUIDANCE

page 45
(Appendix 1 – p.49)

Summary: This report provides guidance to support the preparation of neighbourhood planning In North Norfolk.

Recommendations to Cabinet: **That the guidance is published as additional source of supporting information in the production of neighbourhood planning in North Norfolk.**

Cabinet Members(s): All	Ward(s) Affected: All
Contact Officer(s), telephone number and email: Iain Withington (Planning Policy Team leader) 01263 516034, iain.withington@north-norfolk.gov.uk	

9. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

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

19 JUNE 2017

Minutes of a meeting of the **PLANNING POLICY & BUILT HERITAGE WORKING PARTY** held in the Council Chamber, Council Offices, Holt Road, Cromer at 10.00 am when there were present:

Councillors

Mrs S Arnold (Chairman)
Mr J Punchard (Vice-Chairman)

Mrs J English
Mrs A Green

Mrs P Grove-Jones
S Shaw

Mrs V Uprichard

Observers:

N Dixon
Mrs G Perry-Warnes
R Reynolds
Ms K Ward

Also present (speaking on Minute 67):

Professor Tony Barnett
Dr Imogen Waterson

Officers

Mr M Ashwell – Planning Policy Manager
Mr I Withington – Planning Policy Team Leader

62. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Ms V Gay, N Pearce and R Shepherd.

63. PUBLIC QUESTIONS

None.

64. MINUTES

The Minutes of the meeting held on 24 April 2017 were approved as a correct record and signed by the Chairman.

65. ITEMS OF URGENT BUSINESS

None.

66. DECLARATIONS OF INTEREST

None.

67. CORPUSTY AND SAXTHORPE NEIGHBOURHOOD PLAN PRE-SUBMISSION

The Chairman welcomed Professor Tony Barnett and Dr Imogen Waterson to the meeting. Professor Barnett and Dr Waterson had produced the Neighbourhood Plan.

The Planning Policy Team Leader gave an overview of the emerging Neighbourhood Plan consultation document. The Council's response to the pre-submission consultation document had been updated and circulated to Working Party Members prior to the meeting following the opportunity given across planning and housing teams to add comments to the draft response on their specific specialist areas. The neighbourhood plan remained a broad plan covering many different topic areas. Although recognising that considerable refinement had been made following a previous review of the emerging pre-submission plan and through a number of one to one sessions with Dr Waterson on policy writing there remained a number of areas of concern. Some of these areas related to the duplication and repetition of policies, while others related to the evidence base and justification of approaches. Whilst officers recognised that some aspects were included at this stage as a response to community aspirations, their advice remained that going forward the group should ensure that all policy approaches were underpinned with suitable evidence in order to justify the policy approach. In other areas, further clarity would be required to make the plan effective. He explained that the comments should not be taken as criticism; they were intended to be helpful and constructive to help shape the plan in addressing those areas in order to ensure the plan could be used as an effective decision-making document, and also to assist in ensuring the plan would meet the regulatory tests. The comments detailed in Appendix 2 represented the formal comments of the Council in response to the statutory consultation. This was the only consultation whereby statutory bodies could comment formally on the content of the plan. However the comments remained advisory. Following this stage of the pre submission neighbourhood plan, he recommended that the plan was reviewed in light of the comments received from all the statutory and non-statutory bodies and the final draft plan submitted to the Council along with the Basic Conditions Statement and other regulatory requirements. At that stage the Council's role would change and there was a requirement to undertake the necessary legal checks ahead of arranging for an independent examination.

The Planning Policy Manager explained that whilst the nature of such responses could be seen as negative, the Council's response was intended to identify areas where the effectiveness of the plan could be improved and increase its chances of success at the examination stage. Substantial progress had been made and this was the first neighbourhood plan to reach this stage. The approach taken in producing the plan had been similar to that taken by the Council in its own plan-making.

Councillor Mrs G Perry-Warnes, Member for Corpusty Ward, stated that Professor Barnett and Dr Waterson had put a great deal of expertise and work into producing the document, which had involved the community in identifying its own needs.

The Chairman commended the community for coming together to identify issues and welcome in new families. She explained that the Council's response was not meant to be critical but was intended to make the process as good as it could be. She invited Dr Waterson and Professor Barnett to address the Working Party.

Dr Waterson stated that she was the Chairman of the Corpusty and Saxthorpe Parish Council. She expressed gratitude for the Officer support and financial support which

had been given towards preparation of the Neighbourhood Plan. Many hours had been spent in the preparation of the plan and numerous consultations undertaken with the community.

Dr Waterson explained that consultants commissioned on the advice of NNDC had undertaken some work around policy wording and conformity with the Local Plan. However, on the advice of Officers following an informal review of the emerging plan it had been necessary to undertake further changes. She was disappointed in the service received from the consultants and equally she had been dismayed to receive Appendix 2 (schedule of comments) with further criticisms as she had thought all of the problems had been resolved. The intention was to produce one document which reflected the community and she considered that there had to be differences between it and NNDC documents. One criticism was that the Neighbourhood Plan should be compatible with the emerging Local Plan. However it was not possible to write a plan which was compatible with something which had not yet been written. She considered that the Neighbourhood Plan was in conformity with the existing Local Plan. There was no statutory requirement to prepare a sustainability appraisal and a great deal of time had been spent considering sustainability criteria and produce a matrix to show where the Neighbourhood Plan was in conformity.

There had been very supportive feedback from the community and consultation meetings had been well attended. The document had been tweaked as a result of comments received but there had been no negative comments. Dr Waterson stated that she would like the document to go to examination as soon as possible.

Professor Tony Barnett introduced himself. He referred to the Localism Act which had shifted power towards local communities. He explained the background to the Neighbourhood Plan. He stated that many local interest groups and individuals had been consulted and a great deal of evidence had been gathered. He had been surprised to read Appendix 2 and considered that it damned with faint praise. He considered that the response was strongly against the principle of localism and that the level of detail of the response in respect of an amateur project could appear to be obstructive. The group had a better understanding of the aspirations and goals of the community than NNDC. He was pleased to hear Officers giving the document the praise it deserved at this meeting and asked the Working Party not to undermine local effort.

The Chairman congratulated Professor Barnett and Dr Waterson on the work which had been done in producing the Plan.

The Planning Policy Manager explained that Officers were not trying to frustrate the process but were trying to work positively with Professor Barnett and Dr Waterson to a point where their plan could be supported. The comments were small and it was not being suggested that the plan should be radically changed. He stated that he understood their frustration but it would be a shame to have done so much work and fail at the examination stage.

The Chairman asked what would happen if the plan was submitted as written.

The Planning Policy Manager stated that in his opinion there was nothing in the plan as written which did not conform and he considered that it sat alongside the Core Strategy. However, there were some areas in the policy wording and justification where there were areas of risk at examination. It was for NNDC to point out those areas and the Neighbourhood Plan group could address them if they wished.

The Planning Policy Team Leader recognised that it was difficult to align with a future local plan but comments had been made to “future proof” the Neighbourhood Plan. It was necessary to ensure that its policies were not superseded by the new Local Plan by reference to the current Local Plan. It was further recognised that the neighbourhood plan was Corpusty & Saxthorpe’s plan

Councillor Mrs G Perry-Warnes considered that it would be good to get to the stage where the Neighbourhood Plan was submitted. She suggested that a sentence be added at the end of the document to address any future conflict. She requested that the plan be progressed to the next stage.

Councillor Mrs P Grove-Jones raised questions regarding timescale and the impact of the emerging Local Plan.

The Planning Policy Manager explained the likely timescales for the Neighbourhood Plan and the emerging Local Plan.

Dr Waterson stated that it was hoped to hold a referendum on the Neighbourhood Plan before the end of the year.

The Planning Policy Team Leader explained that the Neighbourhood Plan would have to be taken into account when preparing the Local Plan.

Members of the Working Party expressed support for the plan and the advice contained in the schedule and commended Professor Barnett and Dr Waterson for the work they had done.

Councillor N D Dixon referred to the mixed use area in the plan and stated that the Council would want to support the community by reserving sites for businesses to establish and existing businesses to grow.

The Planning Policy Manager stated that in making a mixed use allocation it was necessary to ensure that there were controls to ensure that the community got what it wanted. Officers could assist with the precise wording of the policy.

The Planning Policy Manager requested that the Working Party decide whether to return the schedule to the group. It was for the group to decide what to do with the comments.

Dr Waterson stated that the group had worked very closely with the Officers. She was happy to have a further session with the Planning Policy Team Leader to finalise matters but would want closure at that stage.

The Planning Policy Team Leader assured her that the comments at Appendix 2 would be the final comments and he would work with the group so they could meet the requirements to go forward to submission.

Professor Barnett confirmed that he was content with this process.

The Planning Policy Manager stated that under the terms of reference of the Working Party it was necessary to make recommendations to Cabinet. He recommended that Cabinet be requested to delegate responses to consultations on neighbourhood plans to the Working Party in future.

Councillor J Punchard supported this suggestion subject to consultation with the local Member.

RECOMMENDED to Cabinet

1. **That the Council welcomes and supports the progress that has been made on the Corpusty and Saxthorpe Neighbourhood Plan.**
2. **That Appendix 2 to the report is agreed as the basis for this Council's response to the consultation.**
3. **That preparation of the final detailed response is delegated to the Planning Policy Manager.**
4. **That responses to consultations on future neighbourhood plans be delegated to the Planning Policy & Built Heritage Working Party, subject to consultation with the Local Member.**

68. NEIGHBOURHOOD PLANNING ACT

The Planning Policy Manager updated the Working Party on the Neighbourhood Planning Act 2017.

Councillor J Punchard commented that the provisions relating to compulsory purchase would be helpful.

Councillor Mrs P Grove-Jones asked how much weight neighbourhood plans had in respect of planning applications.

The Planning Policy Manager stated that neighbourhood plans were statutory planning documents and it would be for the decision-maker to apportion weight.

The Chairman asked which plan would take precedence when determining an application which was contrary to the Countryside policy in the Local Plan but acceptable under the Neighbourhood Plan.

The Planning Policy Manager stated that the Neighbourhood Plan would take precedence as the most up to date plan.

The Working Party noted the report.

69. LOCAL PLAN UPDATE

The Planning Policy Manager updated the Working Party on progress on the Local Plan.

The HELAA document would be published shortly. This would include all potential sites including previously allocated but not yet developed sites, significant planning permissions which had not yet been developed and sites which came forward from the call for sites and town council workshops. The next stage was to shortlist the preferred sites and these would be brought back to the Working Party later in the year, at which time site visits would be arranged.

A more focused approach would be taken in respect of the villages and a report would be submitted to the Working Party in the near future.

The Planning Policy Manager updated the Working Party on the commissioning of evidence, which was progressing gradually.

Work on the local plan was currently 6-8 months behind schedule. A Planning Policy Officer had been successfully recruited but was unable to join the team until September. It was not helpful that the context in which the team was working had changed a great deal and would continue to do so. It was still intended to submit the plan to examination in the current administration.

The Chairman expressed appreciation for the work the team had done. The team had been 50% understaffed for a considerable amount of time and under a great deal of pressure. She asked if a response had been received in respect of the Council's consultation response on streamlining the local plan process.

The Planning Policy Manager reported that there were provisions in the White Paper relating to streamlining of the process. These were not yet in place. There were some areas of concern and a cautious approach needed to be taken as there was a risk of legal challenge. All areas of the previous plan were being revisited to avoid risks but this was time hungry. In-house experience was not available to cover all aspects but the Council had been reasonably successful with the consultants who had been appointed to do the work.

The Chairman referred to comments made by Dr Waterson regarding the consultants engaged by the Neighbourhood Plan group which did not appear to have been good value for money.

The Planning Policy Manager explained how funding for Neighbourhood Planning was allocated. The group had chosen consultants from a list to carry out the conformity test. He considered that there was a need to engage more with parishes before they submitted their plans. Significant comments were being made late in the process which could have been made at an earlier stage. He understood the frustration and stated that the comments were seen as negative when they were not intended to be.

Councillor N D Dixon referred to the difficulties involved in areas which had to consult both the Broads Authority and District Council. He expressed concern at equality issues where there was a lack of expertise. Neighbourhood plans were complex and required a great deal of resources. He considered that simplicity was better. He had concerns regarding the accessibility of neighbourhood plans.

The meeting closed at 11.42 am.

CHAIRMAN

Strategic Housing Market Assessment 2017

Summary: Provides a summary of the main findings of an updated Strategic Housing Market Assessment which takes account of the most recent national household projections to determine the number of dwellings that are likely to be needed in the District over the period 2016 -2036.

Conclusions: That the Objectively Assessed Need for new dwellings in North Norfolk is currently 409 dwellings per annum.

Recommendations: **That the Central Norfolk Strategic Housing Market Assessment 2017 is published.**

That the figure of 409 dwellings per year is used for the purposes of preparing five year land supply statements pending the identification of a housing target in the new North Norfolk Local Plan.

Cabinet Member(s)	Ward(s) affected - All
Contact Officer, telephone number and email: Mark Ashwell, 01263 516325, mark.ashwell@north-norfolk.gov.uk	

1. Introduction

1.1 Following the abolition of Regional Spatial Strategies it is the responsibility of each planning authority to ensure that sufficient homes are built to meet Objectively Assessed Needs (OAN). Establishing OAN is a complex process which starts with consideration of the latest available information in relation to household formation rates and population growth which are published by the Office of National Statistics. The results of the process are presented in Strategic Housing Market Assessments and as new evidence becomes available it is necessary to keep these up to date. The current published Assessment for North Norfolk is based on 2012 based population and household projections.

1.2 The new Central Norfolk Strategic Housing Market Assessment 2017 updates and replaces the existing study and takes full account of the latest (2014/15 based) household and population projections. This Assessment, as with the previous study, was commissioned under the duty to co-operate and relates to a large Housing Market Area based around Norwich covering all of the administrative areas of five District Councils and the Broads Authority. The results are presented for the whole of the Housing Market Area, for each separate district within it, and for a separate core area around Norwich and its hinterland.

- 1.3 The study is one of the key evidence documents which are prepared to support the preparation of Local Plans and determines the number of dwellings needed as well as an indication of the types of homes required. The assessment does not determine the housing target for the district as this is a matter for the Local Plan to consider.

2. How is OAN calculated?

- 2.1 The process of establishing OAN is primarily a projection of trends and sensitivity testing these trends against a range of factors which influence the need for new homes locally. The starting point is the household and population growth projections published bi-annually by the Office for National Statistics (ONS). These centrally produced figures are then subject to testing and refinement by applying local information such as alternative migration scenarios, local vacancy and second homes rates, consideration of jobs growth forecasts, allowances for concealed households and local market considerations, all of which collectively impact on the likely need and demand for new homes in North Norfolk.
- 2.2 The result of the process is a forecast of the total number of dwellings which are likely to be required up to 2036 *if* trends continue in the way expected, how many of these need to be affordable homes and an indication of the mix of dwelling types required. As the projection is based on *household* forecasts it does not account for those who are likely to live in other types of accommodation, for example, those in care and nursing homes. These other types of accommodation need are assessed separately and accounted for when preparing local plans.

3. Why might OAN be different to a Local Plan housing target?

- 3.1 Strategic Housing Market Assessments are just one source of evidence of the number of dwellings which might be needed in the area. They are not policy documents and do not consider the desirability, or the consequences, of seeking to address the identified need within the Housing Market Area.
- 3.2 The National Planning Policy Framework sets out a clear expectation that when preparing local plans each authority should aim to address Objectively Assessed Needs where it is possible and sustainable to do so. Hence, where a housing target in a Local Plan is lower than OAN the evidence supporting a lower target would need to be very clear if a plan is to be found sound at an examination. Furthermore, where lower housing targets are set there is an expectation that any shortfall should be provided for elsewhere within the Housing Market Area by seeking agreement under the duty to cooperate with neighbouring authorities.

4. Key findings of the 2017 Assessment.

- 4.1 The 2017 conclusions are not materially different to those reached in the earlier 2015 study. Between 2016 and 2036 the population of North Norfolk is projected to grow from around 103,300 to 112,739 – an increase over the 20 year period of just less than 10,000 people. Statistically, this population increase is entirely as a consequence of inward migration rates and when this, and expected changes in the way that the existing housing stock will be

occupied are taken into account, there is a projected need in North Norfolk for 8,170 (409 per year) new dwellings over the period.

- 4.2 The other notable point in relation to future population is the age profile of those living in the district. For some years the average age of the population in North Norfolk has been increasing due to the natural aging of the resident population coupled with the in migration of mainly older people. This trend is predicted to continue and accelerate over the next twenty years so that by 2036 it is projected that around 47% of the population will be over sixty years old. This is likely to have fundamental consequences in terms of the types of accommodation required, provision of services, and although it is expected that people will work later in life a smaller and smaller proportion of the population are likely to be economically active.
- 4.3 The SHMA also identifies a substantial need for additional affordable housing with a total of 17,450 affordable dwellings needed across Central Norfolk over the 21-year period 2015-36. Of the 8,000 or so dwellings required in North Norfolk it is assessed that approximate 1,900 (25%) should be affordable. Given the level of affordable housing need identified, it will be important to maximise the amount of affordable housing that can be delivered through market housing led developments. Key to this is the economic viability of such developments, as this will inevitably determine (and limit) the amount of affordable housing that individual schemes are able to deliver.

5. Recommendations

- 1. That the Central Norfolk Strategic Housing Market Assessment 2017 is published.**
- 2. That the figure of 409 dwellings per year is used for the purposes of preparing five year land supply statements pending the identification of a housing target in the new North Norfolk Local Plan.**

Annual Five Year Land Supply Statement

- Summary: Provides an overview of the quantity of housing land which is assessed as being deliverable over the five year period commencing April 2017.
- Conclusions: That the Council demonstrates 6.57 years of housing land supply.
- Recommendations: **That the Five Year Land Supply Statement 2017 is published.**

Cabinet Member(s)	Ward(s) affected - All
Contact Officer, telephone number and email: Mark Ashwell, 01263 516325, mark.ashwell@north-norfolk.gov.uk	

1. Introduction

- 1.1 Each year the Council is required to publish a statement which compares the current requirement for new homes in the district with the likely supply of homes over the next five year period. This statement is helpful in monitoring the progress that is being made on housing delivery and is an important material consideration when making decisions on planning applications for residential proposals.
- 1.2 The formal requirement contained within the National Planning Policy Framework (NPPF) is that each Council should always have available a sufficient supply of *deliverable* building land to meet the next five years requirement for new homes. If a local authority is not able to show it has sufficient deliverable sites its adopted policies for the supply of housing will be deemed to be out of date and other policies which affect the supply of homes will attract less weight in the decision making process. In such circumstances the NPPF states that a presumption in favour of sustainable development should be applied to the determination of planning applications even if they are located in areas where adopted policies would normally resist such proposals.

2. What constitutes a five year land supply?

- 2.1 The five year land supply calculation requires consideration of two main components, determining the current *requirement* and assessing the *deliverable supply*.
- 2.2 The **Requirement** is calculated as follows :

- **Stage 1. Identify the baseline target.** This will typically be the annual housing target which is identified in an adopted Local Plan provided the plan is up to date. Where a plan is out of date because new evidence has emerged it will be necessary to adopt the most up to date figure of housing need that is available. In the case of North Norfolk the Council is currently using housing needs figures derived from recent Strategic Housing Market Assessments (SHMAs). The latest SHMA evidence concludes that from April 2014 onwards there is a need to deliver around **409** dwellings per year in North Norfolk.
- **Stage 2. Adjust the baseline to take account of any shortfalls or surpluses.** If there has been a shortfall in housing provision in earlier years this should be added to the baseline target. Similarly, if there are surpluses these may be deducted from the residual requirement over the five year period.
- **Stage 3. Add a buffer.** The NPPF requires that as a minimum a 5% buffer, or contingency, should be added to the requirement. This should be increased to a 20% buffer where an authority is judged to have *persistently undelivered* on its housing requirement over a period of time. Neither persistent under-delivery or the period of time over which it should be measured are defined in the NPPF but it is widely interpreted as requiring consideration of housing delivery over a sustained period. North Norfolk currently applies a 20% buffer to its housing requirement to reflect the fact that until relatively recently the number of dwellings built in the district each year fell short of the required target. This has not been the case in the last three years as the larger allocated sites from the Local Plan have started to deliver larger numbers of dwellings but if delivery is considered over the entirety of the Core Strategy plan period it remains the case that fewer dwellings have been built than the plan aims to provide at this point in the cycle.

2.3 The results of this equation for North Norfolk are a requirement over the next five years to provide 2,218 dwellings calculated on the following basis.

Table 1. Five year housing requirement from April 2017-March 2022

Component of requirement	No of dwellings
Baseline requirement from the Strategic Housing Market Assessment 2017.	409 per annum
Five Years baseline requirement. 409 dwellings per annum x 5 years	2,045
Minus surplus * of 197 dwellings	1,848
Plus a 20% buffer	2,218
Total current requirement.	2,218 (444dpa)

* Shortfalls or surpluses are accrued from a start date of April 2014 which is the start date for the latest SHMA from which the evidence of housing need is derived. Before this date backlogs are incorporated into the SHMA annual need figure of 409 dwellings.

2.4 This required figure of 2,218 dwellings is then compared to the supply of homes which are assessed as being deliverable over the next five years to see if sufficient sites are deliverable over the period to provide the required number of homes.

2.5 The likely supply of new homes in the district is a projection and as such it is subject to variations influenced by market conditions, land availability, number of

planning permissions granted and so on. To be included within the five year supply the NPPF requires that the authority demonstrates that each of the sources has a realistic prospect of delivering new homes over the applicable five years. The published Five Year Land Supply documents include details of likely delivery of homes from a range of potential sources in three categories:

- **Small sites with planning permission** – These are all the sites which have planning permission for less than ten dwellings including new build and changes of use. Not all sites which secure planning permission get built so a calculated lapse rate is applied.
- **Specifically identified large sites** – These are all the sites which could provide more than 10 dwellings and can include allocated sites, sites with planning permission, pending applications, those which are under construction, and other known sources provided there is a realistic prospect of development over the five year period. Appendix 1 of the Five Year Land Supply statement schedules all of these sites and reaches specific delivery conclusions in relation to each.
- **Windfall** – This is a calculated allowance and represents the likely number of dwellings which do not yet have planning permission but nevertheless have a realistic prospect of gaining permission *and* being built over the next five years. This allowance is based on both historical trend and an assessment of future likely capacity and care is taken to avoid double counting with the two other sources above. As with the small planning permissions a discount is applied to this source to reflect the fact that delivery is less certain.

2.6 These three sources are currently assessed as having a realistic prospect of delivering **2,917** new homes over the next five years.

2.7 A detailed assessment of the requirement and deliverable housing supply in the District was undertaken as part of the Sculthorpe Public Inquiry and was subject to extensive scrutiny during the Inquiry proceedings. The appellant challenged the Authorities position in relation to both the requirement and the deliverable supply. In dismissing the planning appeal the inspector concludes:

In relation to requirement:

'I therefore consider that the Council has taken a pragmatic, robust and convincing approach to the assessment of its OAN (Objectively Assessed Need) of 420 dpa and that in this appeal that is the appropriate figure on which to base its housing requirement.'

And in relation to supply:

'I therefore find that the Council can convincingly demonstrate at least a 5 year supply of deliverable housing sites.'

3. What is the current land supply position?

3.1 For most of the early years of the current plan period prior to around 2013 the delivery of new homes in the district was derived from smaller scale windfall

developments including infills, changes of use and the conversion of rural buildings. These, together with affordable housing schemes delivered via the rural exceptions policy, resulted in between 300-500 dwellings being provided each year. By 2013 the first of the site allocations from the LDF started to deliver completed homes and in the years since the number of dwellings derived from allocated sites has steadily increased. This trend is predicted to continue for the next four to five years but beyond this most of the allocated sites are likely to be built out, or nearing completion, with the exception of the large allocation at Fakenham.

- 3.2 The deliverable supply of homes in the District is currently assessed as **2,917** dwellings. This constitutes slightly in excess of a six year land supply when measured against the current housing requirement derived from the most up to date SHMA evidence.

4. Legal Implications and Risk

- 4.1 As outlined above retaining a five year land supply is critically important to the determination of planning applications for residential development. Where a Local Plan is shown to be up to date and is delivering sufficient homes to meet the next five years of growth the starting position for the determination of planning applications will be to make the decision in accordance with Local Plan policies unless material considerations suggest otherwise.
- 4.2 Where a Plan is not delivering sufficient homes its housing supply policies will be judged to be out of date and the presumption in favour of sustainable development should be applied to planning applications notwithstanding that the grant of planning permission may be contrary to policy.

5. Recommendation

- 1. That the five year land supply statement for 2017-2022 is published.**

Statement of Housing Land Supply & Housing Trajectory

April 2017



North Norfolk District Council

Planning Policy Team

Telephone: 01263 516318

E-Mail: planningpolicy@north-norfolk.gov.uk

Write to: Planning Policy Manager,

North Norfolk District Council,

Holt Road, Cromer, NR27 9EN

www.north-norfolk.gov.uk/localplan

All documents can be made available in

Braille, audio, large print or in other languages.

Please contact 01263 516318 to discuss your requirements.

Statement of Housing Land Supply and Housing Trajectory - April 2017

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1. Introduction

1.1 The five year housing land supply statement sets out North Norfolk District Council's residential land supply position as at 31st March 2017, and considers the likelihood of that supply constituting a five year supply of housing land.

1.2 The National Planning Policy Framework (NPPF) seeks to ensure that the planning system delivers a flexible, responsive supply of housing development land to meet the identified objectivity assessed needs. It requires that Local Planning Authorities identify sufficient specific deliverable¹ sites to deliver the next five years of housing provision. As part of this, the national Planning Practice Guidance, PPG² advises that such assessments should be carried out annually, be based on up to date and sound evidence, taking into the account the anticipated trajectory of housing delivery, consideration of associated risks and past delivery. Assessments should be realistic and be made publicly available.

1.3 This statement is presented in two parts:

Part one explains the Council's methodology for calculating housing supply and provides details of all of the sites where it is considered there is a **realistic prospect** of development over the next five year period. It answers the following questions:

- What is the five-year housing land requirement?
- How much deliverable housing land is there in North Norfolk?
- How many years of housing land supply exist?

1.4 The second part is a Housing Trajectory illustrating development rates since 2014 and projecting delivery over the next five years.

1.5 **Following a robust and conservative approach the Statement concludes that the District currently has sufficient deliverable housing supply for the next 6.57 years.**

¹ To be considered deliverable sites should be available now, they should offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

² PPG paragraph 33 Reference 3-033-20150327

2 Part A – Five Year Land Supply

- 2.1 Local Authorities are required to maintain a five year supply of deliverable housing land by the National Planning Policy Framework (NPPF). The NPPF was published on 27th March 2012 and updated previous guidance on the preparation of a five year housing land supply.
- 2.2 The NPPF at paragraph 47 sets out the expectations on maintaining a five year supply for local Authorities. In addition to being able to demonstrate five years' worth of housing against the adopted housing requirements, it also requires an additional buffer of 5% of the housing supply. The NPPF states that this is to ensure choice and competition in the market for land. However, where Local Authorities have persistently under delivered housing against their targets, the buffer should be increased to 20%.

Methodology

- 2.3 The Council undertakes four stages in the process of determining supply:
- STAGE 1 - Identifying the five year period;
 - STAGE 2 - Identify the scale of housing provision to be delivered including addressing any historical shortfalls and applying buffers to extend choice;
 - STAGE 3 - Identify the housing land supply - sites with potential/reasonable prospect of being built over the 5 year period;
 - STAGE 4 – Calculating the years of supply that is deliverable.

Stage 1 - Identifying the Five Year Period

- 2.4 The five year period covered by this statement is 1st April 2017 to the 31st March 2022.

Stage 2 - Identifying the scale of housing provision to be delivered

- 2.5 Councils are required to meet all objectively assessed need, OAN for housing in their areas. The national Planning Practice Guidance, PPG states that the housing requirement figures in an adopted Local Plan³ should be used as the starting point for calculating the five year supply unless significant new evidence comes forward:

Considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, UNLESS significant new evidence comes to light....Where evidence in the Local Plan has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered...⁴

³ SS3 of the adopted Core Strategy identified at least 8,000 dwellings to be built between 2001 & 2021, an annual requirement of 400 dwellings.

⁴ National Planning Practice Guidance Paragraph 030 Ref ID 3-030-20140306

- 2.6 The Council is currently working on a replacement Single Local Plan and during 2016 in partnership with adjoining authorities commissioned Opinion Research Services, (ORS) to identify the functional Housing Market Area and prepare a Strategic Housing Market Assessment (SHMA) in order to establish the up-to-date Objectively Assessed Needs (OAN) for housing across the Central Norfolk Housing Market Area. In 2017 the SHMA has been updated and as per the required regulations has been based on the most up to date available 2014 household projections.
- 2.7 The Council considers that the 2017 SHMA represents the most up to date evidence in relation to housing need and therefore the identified figure of 409 dwellings per year had been used as the basis for this Statement pending the production of the new Local Plan. This approach of using the most up-to-date information was clarified through the recent appeal decision on Land at Creake Road and Moor Lane, Sculthorpe by Indigo Planning (APP/Y2620/W/16/3150860). In his report the Inspector clarified the Council's position regarding the 5YHLS including using the base date of 2014 for the calculation of the five year supply.

Buffer

- 2.8 The NPPF requires that Local Planning Authorities apply an additional buffer of 5% to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, Local Planning Authorities should increase the buffer to 20% to provide a realistic prospect of achieving the required supply, and to ensure adequate market choice and competition for land.
- 2.9 There is no definition of persistent under delivery; however a 20% buffer is considered appropriate given that shortfalls that have arisen in North Norfolk over a sustained period but not in recent years. Given this, the statement adds a 20% to the housing requirement over the five year period.
- 2.10 The 2017 Central Norfolk Strategic Housing Market Assessment takes into account the historical backlog and resets the base year to 2014. The Council considers that only the shortfall or surplus accrued since 2014, the base year for the most up to date OANs, should be addressed in this Statement as the backlog before 2014 has been accounted for in the SHMA and its inclusion in the requirement would amount to over counting. For completeness the table below sets out the total completions for the whole plan period 2001 -2017. There is an identified surplus of 197 dwellings which has arisen since 2014.

Table 1- Completions against requirement 2001-2017

Year	Completions	Annual requirement	Annual Shortfall (against requirement)	Cumulative backlog
Core Strategy requirement (Policy SS3- 8,000 dwellings / 400 pa between 2001 – 2021)				
2001/02	367	400	-33	-33
2002/03	428	400	+28	-5
2003/04	230	400	-170	-175
2004/05	250	400	-150	-325
2005/06	446	400	+46	-279
2006/07	341	400	-59	-338
2007/08	551*	400	+151	-187
2008/09	258	400	-142	-329
2009/10	416*	400	+16	-313
2010/11	178	400	-222	-535
2011/2012	337	400	-63	-598
Strategic Housing Market Assessment requirement 10,080 dwellings / 420 dwellings between 2012 – 2036 (revised OAN requirement includes backlog from 2001-2012 period)				Cumulative shortfall
2012/13	242	420	- 178	-178
2013/14	383	420	- 37	-215
2014/15	503	420	+83	-132
2015/16	479	420	+59	-73
Strategic Housing Market Assessment requirement 8,998 dwellings / 409 dwellings between 2014 – 2036 (revised OAN requirement includes backlog from 2001-2014 period)				Cumulative Surplus
2014/15	503	409	+94	+94
2015/16	479	409	+70	+164
2016/17	442	409	+33	+197
Total**	1424	1227	n/a	+197

*includes an unusual number of dwelling completions on former Airbases in the District – Coltisham & West Raynham. ** 2012-2016/17.

2.11 In light of the above the Council concludes that it should, over the next five years, be aiming to deliver **444** dwellings each year, calculated as follows:

Table 2 - Annual housing requirement over next five years

a	Annual OAN requirement	409
b	Current annualized surplus (197/5)	39
c	OAN minus surplus (a-b)	370
d	Current annual requirement (c+20% buffer)	444
	Current annual requirement (c+5% buffer)	388

Stage 3 - Site Identification (supply)

2.12 The NPPF at footnote 11 to paragraph 47 sets out the requirements of the deliverable sites which may be included within the five year supply. This states that in order for a site to be considered deliverable it should be:

- **Available** - the site is available for development now;
- **Suitable** – the site offers a suitable location for development and would contribute to the creation of sustainable, mixed communities;
- **Achievable** – there is a realistic prospect that housing will be delivered on the site within five years.

2.13 In addition to the NPPF, the national Planning Practice Guidance (PPG) identifies the type of sites which can be considered against these criteria⁵. This states that deliverable sites can include those that are:

- Allocated for housing in a development plan;
- Sites with planning permission (outline or full that have not been implemented). Unless there is clear evidence that schemes will not be implemented within five years;
- An allowance for unidentified sites (windfalls) provided that there is robust evidence that such sites will continue to deliver new homes.⁶

2.14. This assessment has considered that sites with planning permission are suitable and available, as this test was made at the planning application stage. Where assessing sites deliverability within a five year period sites have been considered as either large or small sites. Large sites are those for 10 or more dwellings, whilst small sites are those for less than ten dwellings. Large sites were defined having regard to the threshold for major planning applications. A judgement on delivery rates for those sites delivering 10 or more is based on local evidence and has been undertaken in order to inform the housing trajectory. Details on site delivery rates assumptions are included in the tables in Appendix 1 for each of these sites.

2.15 On small sites it is not practicable to appraise each site individually, due in part to the number of small scale sites which have the benefit of planning permission. In order to reflect a more accurate housing trajectory approach for this monitoring year, assumptions are used to project the housing delivery for the small scale development by applying a 10% drop out rate. In concluding the delivery rate for small scale permissions, the calculation has distributed small site completions evenly across the five years notwithstanding that precise delivery rates will vary across the period (Appendix1).

⁵ National PPG paragraph 31., ID 3-031-20140306

⁶ NPPF – paragraph 48

Specific Approach to Windfall

- 2.16 Local Authorities are allowed to make an allowance for development coming forward as windfall within the five year period. These are sites which have not been specifically identified in the Local Plan process and may not yet have planning permission. The national PPG states that *“a windfall allowance may be justified in the five year supply if a local planning authority has compelling evidence”*⁷. The NPPF states in paragraph 48 that a windfall allowance should be *“realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”*
- 2.17 Windfall development has been a consistent and substantial contributor towards housing supply in North Norfolk for many years. In fact, before 2013 all development in the District took place on unidentified sites and of the 5,851 dwellings provided since 2001, around 5,243 are on windfall sites as detailed in Table 1, Appendix 2. Since the definition of brownfield was altered to exclude garden sites in 2010⁸, windfall (excluding gardens) has delivered 1,790 dwellings at an average rate of 256dpa. Since the Adoption of the Site Allocation Development Plan Document in 2011 windfall has continued to form a consistent part of development coming forward, providing a slightly increased average of 271 dpa, 2011-2017, (Appendix 2).
- 2.18 In general it is widely assumed that windfall represents a diminishing source of supply however there is no real evidence that this is the case in North Norfolk. It is considered that the level of windfall sites coming forward is likely to be maintained, for reasons including that the adopted policies of the Core Strategy continue to encourage many types of windfall development and recent changes to permitted development rights which reduced the need for planning permission for conversions to residential use continue to add flexibility.
- 2.18 The historical trend detailed in Appendix 2 is cited as evidence that windfall has contributed substantial growth over a sustained period, however the Councils approach is to identify the main sources of windfall in North Norfolk and answer the question – is there compelling evidence that these sources are likely to continue in the future and if so how much development are they likely to yield? In short, the Council has looked both backwards (considered the trend) and forwards (assessed the future sources of supply) in arriving at a windfall allowance.
- 2.19 The Council recognises that relying on historical trends alone is not sufficient to comply with the ‘compelling evidence’ test required in paragraph 48 of the National Planning Policy Framework. Previous delivery rates of windfall development do not, in themselves, provide compelling evidence that this source will continue to provide homes in future years. A wide range of factors will influence actual rates of future delivery including prevailing local and national planning

⁷ PPG paragraph 24.ID 3-24-20140306

⁸ In June 2010 PPS was revised removing garden sites from the definition of Brownfield. This exclusion is carried into the definition of previously developed land in the NPPF.

policies, market conditions, developer confidence, availability of suitable sites, and so on. Nevertheless, the Council considers that windfall will continue to be a reliable source of a substantial number of dwellings in the next five years and for the remaining plan period and adopts a realistic but cautious approach in the Housing Trajectory to this source of supply.

2.21 Rather than just relying on historical delivery rates this statement seeks to identify specific sources of windfall supply to demonstrate that they will continue to be available and contribute to the future supply of dwellings. The following potential sources of windfall are excluded from the future supply:

- **One off large scale windfall sites** – Occasionally unexpected large scale developments may come forward such as the permission for 153 dwellings at Gresham School, Holt (approved in 2015) or on one of the numerous former airbases that are located in North Norfolk. The Council takes the view that whilst such schemes may well occur in future years their delivery has the potential to distort the historical supply statistics and should not be relied upon.
- **Long term empty properties** – Over a number of years the Council has been successful in bringing long term empty homes back into use. Although this may well continue the five year supply calculation is concerned with the net increase of housing stock⁹.
- North Norfolk has a significant number of **static caravans** used primarily for holiday accommodation. Increasingly permission is being sought for permanent occupation. This calculation does not take into account any future additional dwellings brought forward from such permissions.
- **Garden sites** – in 2016 /17 the total identified windfall delivered on garden sites was 31 (Appendix 2). The NPPF states that any allowance for windfall should not include that from residential gardens.

The approach taken avoids the potentially distorting impacts of one off historical supply and is considered more robust by focusing on those sources of windfall which are predictable.

2.22 In addition given that current small scale planning applications may contain existing windfall development and to avoid the potential for double counting, it is assumed that new windfall permissions will not take effect until later in the five year period. Accordingly, the windfall allowance has only been applied from the second year of the five year period.

2.23 In reaching a conclusion on future windfall supply the following analysis has been used:

- **Infill developments and redevelopment within selected settlements:** - In 2008 the Council adopted the North Norfolk Core Strategy. This identified those settlements in the District where infill development would be permitted. Whilst it reduced the number of such settlements from 77 settlements (as identified in the Local Plan 1998) to 26, these 26 retained settlements which

⁹ The 'net' number of homes is the increase in homes whereas the 'gross' is the actual number of homes provided. For example, if an existing house was demolished and 4 built in its place, the gross housing number would be 4, but the net increase would be 3

make up the developed hierarchy included all of the larger villages and all 7 of the market towns in the District which had collectively been delivering around 80% of new housing supply. In essence the 'removed' settlements had been making very little contribution to windfall totals. Since this date infill and redevelopment has continued to provide a significant source of new homes in the District. Between 2011 and 2017, approximately 1108 dwellings can be attributed to infill and redevelopment from windfall¹⁰ in the 26 service towns and villages. This equates to approximately an annual delivery rate of 185 dwellings.

- **It is assumed that 100 dwellings per annum**, approximately 54% of this recent delivery rate will come from this source over the next five years.
- **Conversions of rural buildings**
 - Including planning permission for conversion of rural buildings;
 - Removal of holiday occupancy only conditions on holiday lets and;
 - PD rights allowing agricultural buildings to dwelling houses (maximum 3 dwellings) (Part 3, Class Q).

The conversion of rural buildings to alternative uses has been a consistent feature of adopted planning policies for many years. The adopted Core Strategy includes a permissive approach to residential conversion in some parts of the District, with a presumption in favour of commercial uses including holiday accommodation in the remainder. Following publication of the NPPF the Council amended this adopted approach to allow for residential conversion throughout the District irrespective of location and to allow for the removal of holiday only restrictions in some circumstances.

Research undertaken as part of the preparation of the Core Strategy suggested that at that time there were in excess of 500 converted units of holiday accommodation and as many as 1,500 - 2,000 suitable buildings which had not been converted. It is acknowledged that this remains a diminishing source of supply and that not all barns will be converted nor all holiday occupancy conditions removed, and the Council has only included a modest allowance from this source. In addition due to the potential for double counting the removal of holiday conditions has been discounted from inclusion in the future trajectory at this time.

Alongside this, changes to national policy for agricultural conversions have been in place since April 2014, the numbers of applications for prior approval of these types of development are low at present with only 28 dwellings having been given prior approval through Class Q. It is expected that permitted development rights for agricultural buildings will deliver more homes in the future. In addition to this though, full planning applications for conversions to more than 3 dwellings continue to come in and have resulted in approvals for an additional 151 dwellings in the same period.

¹⁰ Appendix 2 table 1 b-d-table 2 c-table 3 a

All of this combined has resulted in permissions for 243 new conversions and the removal of holiday only conditions on a further 132 properties over past five years (Table 2, Appendix 2).

- **It is assumed that 25 dwellings per annum**, approximately 56% of the recent delivery rate will come from this source.¹¹
- **Rural Exceptions Development:** - NNDC is committed to delivering affordable housing on rural exception sites. Policy HO3 of the Core Strategy supports such development and adopts a flexible but permissive approach across the District. Through the application of this policy a total 256 dwellings on 25 schemes have been provided since 2001/02 as detailed in Appendix 2, table 3. There are currently 83 dwellings on site, due to start on site or with planning permission which are expected to complete over the next five years. In addition a further 52 dwellings are being discussed for various sites throughout the district which may also deliver within the remainder of the plan period, although these are in the very early stages. Recent recruitment of three new staff members to support delivery of exception housing schemes will increase delivery above the numbers currently expected.
 - Accepting that these sites do not have planning permission and there is no cast iron guarantee that they will be developed **a conservative assumption is made of 10 dwellings per annum.**
- **New Sources of development:** Other PD rights changes which affect the district are the relaxation of the requirements for changes of use applications for:
 - Office to residential conversion to dwelling houses (Part 3, Class O);
 - Storage or distribution to dwelling houses (Part 3, Class P), and;

It is expected that Classes O and P will only contribute a modest supply to the future windfall allowance and are time limited. Therefore no assumption for delivery from these sources has been made in the windfall projections.

2.24 In addition to the exclusion of garden land **this calculation assumes the delivery of 135 dwellings per annum through windfall development.** In comparison the average historical position 2010 – 2017 the average rate has been 256, (Appendix 2). The windfall allowance has only been applied from the second year of the five year period.

2.19 This approach was considered at the Sculthorpe appeal hearing¹² where the inspector stated that *‘while windfall rates have varied, there has been a consistent annual supply over the past years*

¹¹ Appendix 2, Table 2 – $25/44 \times 100 = 56\%$

and considered there to be a reasonable prospect of 4 years of windfall housing delivery, amounting to 540 dwellings coming forward over the remaining period’.

Residential Institutions

- 2.26 The national PPG also permits local authorities to include housing provided for older people, including Use Class C2 residential institutions against their housing requirement¹³

Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement.....

The five year supply calculation is concerned with the net increase of housing stock¹⁴ and the Council must decide whether it has robust information to justify including residential institutions such as care homes into its supply calculation. Similarly student accommodation can be included towards the housing requirement, based on the amount of accommodation it releases in the housing market. Where all the facilities for each unit/dwelling are behind a separate door, these can be counted in full towards the housing supply. However if accommodation is comprised of bedrooms as opposed to dwellings, the number of bedrooms provided does not necessarily correlate to the number of dwellings such as a care home and a reasonable assumption has to be made as to what extent an increase in care accommodation would lead to the release of existing housing onto the market, and thus contribute to net supply. Where this is included it is considered reasonable to apply a 50% reduction to reflect the fact that a proportion of bed spaces in residential homes are likely to be taken up by individuals who do not release their previous dwelling for occupancy by a separate householder.

- 2.27 The Joint Central Strategic Housing Market Assessment does not readily identify a separate need for C2 dwellings in its assessment of OAN. This is also consistent with the previous SHMA undertaken by this authority and the matter has not previously been included in the Council’s Five Year Assessment. Current Government policy is underpinned by the principle of sustaining people at home for as long as possible and although a small number of such schemes may come forward it is assumed at this time that the provision of residential care, C2 will remain constant and that the need will be provided for as specialist housing in Use Class C3.

3 Stage 4 – Calculating the years of supply

¹³ National PPG ID para 37 Reference ID: 3-037-20140306 & 38 Reference ID: 3-038-20140306)

¹⁴ The ‘net’ number of homes is the increase in homes whereas the ‘gross’ is the actual number of homes provided. For example, if an existing house was demolished and 4 built in its place, the gross housing number would be 4, but the net increase would be 3

3.1 The table below shows how the overall land supply position in the District is calculated. The table includes figures for the number of dwellings built, a revised annual average requirement (based on the identified need in the Central Norfolk Strategic Housing Market Assessment, published 2017) and the accumulated surplus since 2014. **The land supply position as at 1st April 2016 is 6.57 years calculated as follows:**

North Norfolk District Council Five Year Housing requirement - (1 April 2017 - 31 March 2022)	
OAN requirement 2014- 2036(SHMA, 2017) (409dpa)	8,998
Requirement 2014 - 2017 (409 x3)	1,227
Completions 2014 – 2017 (table 1)	1,424
Residual requirement over rest of period (2017- 2036), (8,998-1,424) (19yrs)	7,574 (399dpa*)
Surplus since 2014 (1,424 - 1,227)	197
5 year requirement 2017 - 2022 (409 x 5)	2,045
Inclusion of identified shortfall/surplus (2,045-197)	1,848
Shortfall plus NPPF buffer (20%) (2,045 – 197 + 20%(370))	2,218 (444dpa) residual requirement
Total deliverable supply over five years (See Appendix 1)	2,917
Excess in supply (2,917 - 2,218)	669
Supply in years (2,917/444)	6.57 years

*Rounded up

4. Monitoring the five year supply

- 4.1 The Council will monitor the five year supply of deliverable sites on an annual basis. This statement will be updated regularly to take account of any significant changes. New planning permissions and completions are recorded on a continuous basis. Dwelling completions are recorded annually with the results published in the Housing Land Availability Statement published in April/May each year.
- 4.2 To maximise the likelihood of the housing requirement being met and to incentivize delivery the Council has introduced a temporary Housing Incentive Scheme aimed at improving the viability of residential development and encouraging the early commencement and delivery of residential schemes. Details of the scheme are available on the Council’s website¹⁵. Nevertheless delivering this number of dwellings on a consistent basis over the next five years will depend on continued development on many of the larger site allocations and the continuation of improved market conditions. The Council will keep the land supply position under regular review.

¹⁵ <https://www.north-norfolk.gov.uk/section/planning/planning-policy/>

Part B - Housing Trajectory

5 Introduction

- 5.1 Annual recording of dwelling commencements, dwellings under construction, dwelling completions, new planning permissions granted, and assessment of what developments may occur in the coming years is an essential part of the 'plan, monitor, review' approach to housing delivery and plan making. A Housing Trajectory is produced annually by the Planning Authority to illustrate past and likely future trends in housing provision having regard to land availability and historical/future patterns of development.
- 5.2 This section outlines the methodology used in producing the trajectory and includes a trajectory for North Norfolk covering the period 2014 to 2021. It identifies the quantity of planned housing development over this period, how much of this has been built and what remains to be provided. It draws together existing published sources of information on site suitability, availability, achievability and viability, and makes an assessment of when development may occur in the future.
- 5.3 It should be recognised at the outset that there are a wide range of influences on the housing market and consequently assessments about the levels of future provision are susceptible to change. Nevertheless, if a robust and cautious approach is taken and the trajectory is subject to regular review, some broad conclusions can be reached about levels of future housing supply in the District over the medium to long term.

6 Information Sources

- 6.1 Housing related data is monitored annually by the Planning Authority for the period commencing the 1st of April and ending on the 31st of March each year. Data is published as follows:
- **Housing and Employment Land Availability Assessment (HELAA)** (previously known as the Strategic Housing Land Availability Assessment) – has been split into two sections with the first section focusing on the capacity of the district to accommodate housing growth, the second part will focus on employment capacity. The study identifies all reasonable potential sources of dwelling completions in the district and makes an assessment of the suitability of sites, their availability, and when development could be delivered in the event of such sites being released for housing. Whilst these studies identify a large amount of theoretical capacity they are not policy documents and do not reach any conclusions in relation to whether this capacity should be made available for development through allocation in a development plan document or by the grant of planning permission.
 - **Five Year Housing Land Supply Statements** (Part A of this document) – these have been published by the Council every year since 2007 and relate the amount of housing that has been provided and is expected to be provided over the next 5 years, with the minimum

levels of planned growth identified in the adopted Core Strategy. In addition to dwelling completions and planning permissions these statements also include an assessment of when identified development sites will be built. In the absence of a five year supply of development sites intervention may be required via the allocation of new deliverable development sites in development plan documents or the grant of additional planning permissions on unallocated sites where development would be sustainable in accordance with the NPPF.

- **Housing Land Availability (HLA)** – published by the Council each year since 1995 these provide a summary of the number of dwellings completed in each Parish of the District. These statements are available on the Councils web site.

6.2 Whilst the trajectory is prepared by the District Council it is the result of discussions with landowners, developers, Housing Associations and others with an interest in housing development in North Norfolk. The Strategic Housing Land Availability Assessment in particular is primarily derived from information supplied by public and private sector housing providers.

7 Need and demand

7.1 The evidence¹⁶ indicates that there are high levels of both demand and need for additional housing in the district with a requirement for 9,816 dwellings in total of which 2,200 should be affordable between 2014 and 2036. The need for additional affordable housing in parts of the District is in large part due to higher than national average house prices and lower than average incomes.

7.2 In the past the slowdown in both the local and national economy has had a significant impact on the local new build housing sector. Both dwelling completions and dwelling commencements had declined however over the medium to long term the demand locally for market housing has been strong, fuelled in part by high levels of in-migration and in recent years have shown signs of significant improvement.

8. The Local Supply of Housing Development Land

8.1 Historically for a number of years the Council has applied land use policies that have constrained the opportunities for new residential development. This approach arose as a result of relatively high levels of new house building in the 1980s and early 1990s and a concern that if such trends were allowed to continue dwelling completions in the district would exceed the requirement of the then adopted Structure Plan. Consequently, the North Norfolk Local Plan, adopted in 1998, made no new housing land allocations and included policies that constrained the opportunities for new dwelling completions to locations within the boundaries (infill development) of

¹⁶ Joint Central Strategic Housing Market Assessment 2017, ORS

approximately 80 defined settlements. Despite this policy of development constraint an average of 346 dwellings were built each year over this period. Most of this (in excess of 75%) occurred within the 24 settlements which have now been selected for further growth in the current adopted Core Strategy (2008).

- 8.2 Average annual dwelling completion rates in the District have declined in the last ten years and have only recently shown signs of recovery. Large releases of dwellings at the former airbases at Coltishall and West Raynham produced high ‘completion’ rates in 2008 and 2010. Whilst the previous economic climate has played a significant part in previous reductions, the absence of larger scale housing land allocations until 2011 has undoubtedly limited development opportunities until recent years. The Council considers that both land supply and market factors have influenced the reduction in dwelling completion numbers in the district.
- 8.3 In 2011 the Council adopted a Site Allocations Development Plan which allocated land for an additional 3,400 dwellings. These allocated sites represented a new source of housing land supply that had not previously been available in the District. As outlined elsewhere in this statement the Council has introduced a temporary Housing Incentive Scheme which includes a range of measures designed to improve development viability and encourage the quicker delivery of development. This scheme was introduced as a specific response to difficult economic conditions and an acknowledgement by the Council that intervention was required to deliver planned and approved development at a faster rate. New dwelling completions continue to show some improvement and remain above the levels predicted in last year’s statement (328), a trend which looks set to continue given the higher number of dwellings under construction and with new planning permissions.

9. The Housing Trajectory 2014/15– 2021

- 9.1 The housing trajectory illustrates in graphical form the quantity of housing development in the district since 2014, the predicted future levels up to 2021 and compares this to the planned levels of housing growth over this period.
- 9.2 Four separate sources of dwellings are modeled:

1-Dwellings which have been built

Dwelling completion rates are recorded annually and published on the Housing Land Availability (HLA) web page (<https://www.north-norfolk.gov.uk/section/planning/planning-policy/>).

Completions are monitored via Building Regulation completion records and site visits. A dwelling is recorded as complete when it is substantially completed and available for occupancy.

Completions include new build dwellings, sub-divisions, conversions, changes of use, and premises where restrictive planning conditions are removed to allow residential occupancy. These are expressed as net additions to the housing stock (i.e. taking account of any housing loss).

Dwellings and other types of accommodation which are subject to holiday occupancy restrictions are not counted as net additions. Only self-contained dwelling units in the C3 Use Class are included notwithstanding that some other types of residential accommodation are the sole and principle residence of the occupant (e.g. Care and nursing homes).

2-The permitted supply: sites with planning permission including allocations with permission

This comprises of sites which already have planning permission. Dwelling numbers in this category will include dwellings with planning permission which have not been started and those which are under construction but are not yet recorded as completions. The Authority calculates that approximately 10% of all dwellings permitted on sites of 10 dwellings or less will never be built and this is deducted from the figures. Small sites with permission are averaged over the 5 year period.

The Five Year Land Supply Statement reaches conclusions about the likely dwelling delivery rates on sites with planning permission, which are detailed in Appendix 1. Overall it concludes that whilst there is already planning permission for around 2,343 dwellings¹⁷ which have yet to be built (before lapse rate on small sites is applied) it is likely that only a proportion of these will be built over the five year period from 2017 to 2022.

The trajectory includes those dwellings in this category identified in the Five Year Land Supply as likely to be built over this five year period. For the purposes of producing a trajectory the total dwellings on small sites (less than 10) in this source are divided equally into five annual amounts and shown as being built at an equal rate over the five year period (2017-2022). For larger sites (more than 10), an assessment has been made as to when development is likely to occur between the current year and 2022. In practice precise delivery rates will vary year on year.

3-Supply arising from the allocations in the Site Specific Proposals Development Plan

(excluding those with planning permission (included above))

Since April 2011 the allocated sites have been included in future housing supply. The rate at which these will deliver dwellings is based on the evidence in the Housing and Employment Land Availability Assessment and takes into account a wide range of information including site ownership, registered interests from the development industry, stated intentions of developers, time taken to secure planning permission, any specific site constraints that are likely to impact on delivery times and the current economic climate. These sites did not start to deliver housing completions until 2013 but development has now commenced on many and they are expected to be an increasing large proportion of dwelling completions in future years.

¹⁷ Appendix 1 table 2, total permissions incl Allocations in 5year supply + beyond + 10% lapse rate small sites

4-Supply arising from windfall sites

It is not practical or possible to identify all sources of future housing development on a site by site basis. For example, the HELAA and Site Allocations DPD focus on larger sites (mainly those that can accommodate 10 or more dwellings in towns and three or more in villages). Future housing supply in the District will comprise of developments on a mixture of both identified and unidentified sites. In the past these unidentified sites have been the sole constituent of housing development in the district and have yielded an average of 328 dwellings per year over the plan period.

The adopted Core Strategy identified a historical windfall rate of approximately 250 dwellings per year to the total housing supply. The historical position between 2010 – 2017 delivered on average 256 per year (Appendix 2). To ensure that the trajectory adopts a cautious approach to housing delivery and this source of supply the Council has further reduced likely dwelling completions in this category to assume 135 dwellings a year, excluding the first year of the five year period. See windfall assessment in chapter 2.

- 9.3 The four sources described above are shown in different colours on the graph in Appendix 4. The table in Appendix 3 provides dwelling numbers for each constituent part of the supply, 2017-2022. Expected dwelling delivery rates on the proposed housing allocation sites are modelled in Appendix 1.

In producing this trajectory the following assumptions have been made:

- The recent improvement in the housing market will be sustained over the next few years.
- On the larger development sites (allocations) a period of two/three years from the date of a planning application to dwelling completions should be expected unless there are specific circumstances to suggest otherwise. A shorter time period may be adopted where a site is subject to the provisions of the Housing Incentive Scheme.
- That allocated development sites cannot be developed until specifically identified constraints have been addressed.
- That around 10% of planning permissions on sites of 10 dwellings or less will never be built.
- That larger development sites are unlikely to deliver more than 30 dwellings per year if developed by a single developer unless there is evidence that would suggest otherwise. For example, some national house builders will build at higher rates (depending on market conditions) and the 'block' release of Housing Association properties will produce higher completion numbers in some years.
- Windfall will contribute from the second year.

Appendix 1

Allocation
 With permission
 Small Site
 Additional Sources of Supply
 Windfall projections

Appendix 1: Schedule of sites and projected delivery of sites of 10 dwellings or more

Data correct as at 01.05.2017

The table below provides details of all those sites where the Council considers there is a reasonable prospect of development being delivered in the next five years.

It includes the three main sources of supply identified in the land supply statement, namely, large sites which are either allocated or have planning permission for development, sites of less than 10 dwellings which already have planning permission and an allowance for windfall developments in accordance with Appendix 2.

The site reference numbers are either those given to the site in the North Norfolk Site Allocations Plan or are the planning application reference. Both the Allocations Plan and details of each planning application, including location plans, are available on the Council's web site.

Many of the sites included within this schedule are already under construction and some of the approved dwellings have been completed. Precise delivery rates of development will vary year on year and will be kept under review via production of annual statements of land supply.

Site reference	Location	Planning Status					Build Information			Assessment of delivery and comments							
		Allocation target	Pre-application discussion	Current pending application	Outline planning permission	Full planning permission	Completed before April 2017	Left to be built (inc under construction)	Under Construction	Total dwellings in 5yr supply	2017/18	2018/19	2019/20	2020/21	2021/22	Beyond March 2022	
ALD01	Garage site / Pipits Meadow Aldborough	8	2				0	8		0						8	Site in multiple ownerships, development would require relocation of existing businesses. Site is not considered to be available now so development unlikely in next five years.
BACT03	Land adjacent to Beach Road, Bacton	20	20				0	20		0						20	Pre-application discussions were held with the land owner in 2015 who intended to secure a developer and make an application under the Housing Incentive Scheme. Whilst the site is currently available, no planning application has been made and there is insufficient evidence of delivery at this stage to include within the five year supply.
BACT05 PF/15/1213	Land to rear of Duke of Edinburgh Public House, Bacton	14				24	0	24	24	24	10	14					A full planning application for a scheme of 24 units has been granted and work has started. All units will be completed within the five year period
PF/14/0859	Land at Hall Close, Bodham, Holt, NR25 6PW					16		16				16					Funded Housing Association Scheme which is programmed to start during 2017 and is expected to be completed in two years
BRI02	Land West of Astley Primary School, Briston	30					0	30								30	Although allocated this site is currently unavailable and is considered unlikely to deliver development before 2021. Not included in 5yr supply.
BRI24 15/1746	Land at rear of Holly House, Briston	10				12	0	12			6	6					The site is allocated and is available for development now. A full planning application by a house builder for 12 units has been granted. Development is expected to commence during 2017.
CAT01	Land off Lea Road, Catfield	15					0	15								15	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints but owner indicates not likely to come to market before 2020.
COR01	Land between Norwich Road & Adams Lane, Corpusty	18	18				0	18								18	Pre-application discussion with house builder during 2016. Application not yet made so delivery remains uncertain.
09/0826	Burnt Hills, Cromer					13		13	1			2	2	2	2	5	Site has planning permission. Owner indicates small number of completions over five year period dependent on market conditions
19941720 19961424	Central Road, Cromer					106	80	26								26	26 remaining units as part of base consent for 106 dwellings. Delivery would require relocation of existing commercial use. No sign of recent activity so not included with five year supply.
022.002 19741952	Cromwell Road, Cromer					20	10	10	1		1		1			8	Building single plots at intervals. Due to slow build rates it is assumed that only 2 of the remaining plots will be completed within 5 years although the site could be completed over this period.

19901666	Highview, Cromer				41	21	20	2	0						20	No sign of recent activity. Although some or all of these dwellings could be built no allowance has been made for dwellings within next five years as it is not clear when development will recommence.
C01	Land adjacent to East Coast Motors, Beach Road, Cromer	40				0	40		0						40	Owner indicates existing use to be retained in the short term but site likely to become available towards end of plan period.
C04 15/0572	Land at rear of Sutherland House, Overstrand Road, Cromer	60	68		68		68		68		22	22	24			Site is owned by local development company, is allocated for development and has outline planning permission, development is viable and subject to grant of planning permission the developer confirms it would be delivered within three years. Pre-application discussions have taken place in relation to a full application which has been submitted for 68 sheltered housing apartments. Likely commencement of development shortly after permission granted.
C07 13/0451	Land at Jubilee Lane / Cromer High Station, Cromer	40			8	8	32		0						32	Site is allocated and has recently been marketed by land owner. LPA has given pre app advise to a number of prospective purchasers but no planning application has been made to-date. Insufficient evidence of delivery at this stage to include within five year supply (eight dwellings have been completed on part of the site).
C14 13/0247	Land West of Roughton Road, Cromer	160			145	61	84	18	84	30	30	24				Site has full planning permission and is under construction, a substantial number of units have been started. Developer (Norfolk Homes) indicates that dependent on sales rates the site is likely to be nearing completion within five years.
PF/15/1587	Land to the south of, Eagle Road, Erpingham				10		10		0						10	Although the site has planning permission commencement dates are unclear.
PF/15/1603	Community Health Office, Barons Close, Fakenham				13		13	13	13	13						The site has full planning permission and is under construction.
20081342	107-109 Holt Road, Fakenham				16	1	15		0						15	Whilst site has full planning permission there is insufficient evidence of delivery to include at this stage.
F01 (part)	Land North of Rudham Stile Lane, Fakenham	950		950			950		120				60	60	860	These three sites all lie within the F01 allocation in the Site Allocations Development Plan. Trinity college have applied for outline planning permission for 950 dwellings and will market the site once consent is in place. 101 dwellings are under construction on the Places for People site. The Picken site has outline permission for 78 units and is under option to a national housebuilder who intends to make a reserved matters application in July 2017 with the site completed well within the five year period.
F01 (Picken) PO/14/1212	Land North of Rudham Stile Lane, Fakenham			78			78		78		30	30	18			
F01 (Places for People) PF/15/1167	Land North of Rudham Stile Lane, Fakenham				101		101		101		30	30	41			
F05 (remaining part without permission)	Land between Holt Road & Greenway Lane, Fakenham	36					36		0						36	Part of the site completed (24 units). Development of remainder will require relocation of existing uses and land assembly, therefore development considered unlikely in next five years.
20070477 15/0854	Newman's Yard, Norwich Road, Fakenham				20		20	20	20	20						Site has full planning permission and is nearing completion
PF/16/1462	Land on the west side of, Barons Hall Lane, Fakenham				10		10		10	10						The site has full planning permission, is under construction and expected to be completed in 2017/18
19892604 20001459	Smiths Lane, Fakenham				81	51	30		0						30	Very slow build rates in recent years, no sign of recent activity. Unlikely to be completed in 5 years so no allowance made at this stage.
HAP07	Land West of Whimpwell Street, Happisburgh	14					14		0						14	Small site in private (mixed) ownership which may delay delivery, no current developer interest. No exceptional development costs or infrastructure constraints but no evidence of likely delivery within five year period.
PO/14/0274, (16/1512) PM/15/1578 PO/14/0284 (16/1511)	Land South of Cromer Road and North/East of Grove Lane, Holt				140		140		140	30	30	30	30	20		Site has full planning permission and is owned by Hopkins Homes. Development commenced 2017 and is expected to be complete by 2021/22.
H01 PM/15/0804	Land West of Woodfield Road, Holt	100		85	83		83		83		30	30	23			Reserved Matters Planning Approval has been granted to Norfolk homes who indicate commencement 2017/18.
H09 PM/16/1204	Land at Heath Farm / Hempstead Road, Holt	200		215	213		213		213	32	46	59	38	38		Site has full Planning Permission and development has commenced. Projected delivery rates confirmed by Lovell Homes
H12	Land off Hempstead Road	70					70		60			30	30		10	Site owned by regional house builder and included within construction program in later years of current plan period. Developer indicates may be delivered at earlier date. Reptile relocation works on going.

HOR06 11/1505	Land East of Abbot Road, Horning	26		26				26	0							26	Outline planning application awaiting decision pending upgrades to local sewage treatment works. Upgrades have been completed and effectiveness is being monitored. Delivery within five years is probable but insufficient evidence at this stage to include within five year supply.
SN01 14/1249	Land at junction of Holt Road & Kettlestone Road, Little Snoring	20		20				20	20				10	10			Outline planning permission granted. Site is available and suitable for development and has been purchased by house builder who is preparing full application.
SN05	Land adjacent to Little Snoring Primary School, Kettlestone Road, Little Snoring	10						10	0							10	This site is allocated and is suitable for development but there has been insufficient recent interest to include within five year supply.
LUD01	Land South of School Road, Ludham	15						15	0							15	Full application made in 2015 but withdrawn by applicant.
LUD06	Land at Eastern end of Grange Close, Ludham	10						10	0							10	No current developer interest. No exceptional development costs or infrastructure constraints but no evidence of likely delivery within five year period.
PM/15/0170	Bowling Green, Grove Road, Melton Constable					38		38	0							38	Site has been marketed with planning permission but little interest so not included within five year supply at this stage.
069.047	Melton Constable Hall, Melton Constable					33	8	25	3	0						25	Extant planning permission but no recent progress. No units included within five year supply.
MUN06 PF/15/1534	Land at Grange Cottage / Water Lane, Mundesley	40				40		40	40	15	20	5					Site has planning permission and development commenced during 2017. Completion expected within three years.
10/0682	13-21 Bacton Road, North Walsham					21	16	5	5	5							Development completed on conversion element of approved scheme with new build to follow thereafter. Completion expected in 2017/18.
NW01 (part of site) PF/13/0866	Land at Norwich Road / Nursery Drive, North Walsham	176				176	52	124	46	124	40	40	30	14			Development has started. Developer (Hopkins Homes) confirms delivery of between 25 -40 units per year depending on release of affordable units and sales rates of market units. Site is programmed for completion in 2019/20 but may take slightly longer to complete depending on market conditions.
NW01 (Toft Land) PF/15/1010	Land at Norwich Road / Nursery Drive, North Walsham	100	100			100		100		100	30	40	30				Site has full planning permission for 100 dwellings and development commenced early 2017. Developer (Persimmon Homes) confirm approx 40 completions per year.
NW01 (remainder of allocation)	Land at Norwich Road / Nursery Drive, North Walsham	150						150	0							150	Remainder of NW01 allocation not subject to any current planning applications so not included within current five year land supply period.
NW25	Land off Laundry Loke, North Walsham	10	30					30	45		15	30					Housing Association investigating acquisition of adjacent land to increase the size of the site and deliver approx 45 dwellings. Some pre application discussions with full application anticipated during 2017 and commencement in 2018.
NW28a	North Walsham Football Club, North Walsham	60						60	0							60	Dependent upon relocation of football club (relocation costs), with possible highways issues. Some development on this site within the next five years is possible but considered unlikely given the need to relocate the football club to an alternative site.
OVS03	Land at rear of 36 Bracken Avenue, Overstrand	6						6	0							6	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints but given lack of interest not included within land supply for next five years.
PM/14/0854 (075.001)	Hillingdon Park, Overstrand					35	25	10	1	10	5	5					Ten plots remaining from earlier development scheme have now secured reserved matters approval and are under construction.
OVS04 PM/15/1714	Land South of Mundesley Road, Overstrand	35				42		42	3	42	15	20	7				Site has full planning permission and Hopkins Homes have commenced development which is expected to be complete by 2019.
ROU03/10 14/0986	Land at Back Lane, Roughton	30		30				30	0							30	Outline application awaiting decision. Insufficient certainty to include site within five year supply at this stage.
PM/15/1341 PM/16/0140	Roughton Motor Co, Chapel Road, Roughton					21	4	17	1	21	21						Full planning permission granted and site is under construction and due for completion 2017/18
SH04	Land adjoining Seaview Crescent, Sheringham	45						45	0							45	Greenfield site owned by local developer, but no recent interest shown so not currently included within five year supply..
SH06 (16/1725)	Land rear of Sheringham House, Sheringham	70		62				62	62				30	30	2		Site is owned by local development company, is allocated for development, development is viable and owner confirms that subject to grant of planning permission would be delivered within three years.

SH14 15/0114	Land at Holway Road, opposite Hazel Avenue, Sheringham	50				52		52		52								Site has full planning permission for 52 units. Developer advises commencement in 2018.
PF/14/0644	Land at Seaview Crescent, Sheringham					11		11	5	3		3						Full planning permission for a net gain of 3 units. Site had planning permission for 8 dwellings before grant of latest permission for 11. 8 dwellings included in small sites. Applicant intends to complete revised scheme over next 3-5 years.
19770968	The Esplanade, Sheringham					55	24	31		0							31	Implemented permission with no evidence of recent activity. Although some or all of these dwellings could be built no allowance has been made for dwellings within next five years.
15/0001	Former Hilbre School, Sheringham				40	32		32		32	6	20	6					Site has full planning permission and is under construction.
20071919	Old Baker's Yard, High Street, Stalham					15	5	10		10		10						Site has full planning permission and remaining 10 units (phase 2) are under construction and expected to be completed during 2018/19
ST01 12/1427	Land adjacent to Church Farm, Ingham Road, Stalham	160				150	139	11	3	11	11							Site has full planning permission and development is nearing completion.
092.019	Clipped Hedge Lane, Southrepps					26	23	3	1	0							3	Site developing slowly, may be completed within 5 years
SOU02	Land West of Long Lane, Southrepps	10						10		0							10	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints
SOU07	Land North of Thorpe Road, Southrepps	12						12		0							12	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints
W01 13/0007	Land at Market Lane, Wells- next-the-Sea	120				123	119	4	4	4	4							Site has full planning permission and development is nearing completion.
WAL01	Land East of Wells Road, Walsingham	24						24		0							24	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints but site is not currently available.
20080506	RAF West Raynham, Massingham Road, West Raynham				58			58		58		28	30					Resolution to grant full planning permission
10/0295	39-52 Renwick Park, West Runton					10	1	10		0							10	Very slow delivery rates with plots built at intervals.
WEY03 PF/15/1095	Land at The Street, opposite The Maltings Hotel, Weybourne	4	7			7		7	7	7	7							Planning Permission Granted PF/15/1095. Development commenced early 2017.
WEY09	Land South of Beck Close, Weybourne	4						4		0							4	Small site in private ownership with no current developer interest. No exceptional development costs or infrastructure constraints
Total from small sites (under 10 dwellings which already have planning permission)					66	736		736	193	662	133	133	132	132	132			736 dwellings have planning permission and are yet to be completed. The figure of 662 represents 736 dwellings minus a 10% lapse rate.
N/a	RAF West Raynham				58			41	17	7	17	10	7					Ex-RAF housing stock slowly being released (note – this is separate from the above planning permission).
Windfall						N/a				540	0	135	135	135	135			Based on the delivery of a 135 units per year as windfall development commencing in year 2. See Appendix B for detailed justification.

2917	454	714	733	627	389
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Table 2: Summary of Schedule of sites and projected delivery

	Total dwellings in 5yr supply	2017/18	2018/19	2019/20	2020/21	2021/22	Beyond
Total Allocations	1350	200	353	399	298	100	1485
Total Allocations with PP	963	170	298	279	178	38	30
Allocations without PP	387	30	55	120	120	62	1455
Total Planning Permissions	1027	254	226	199	194	154	251
Large Sites with PP	348	111	86	67	62	22	251
Small sites (with 10% discount)	662	133	133	132	132	132	0
West Raynham	17	10	7	0	0	0	0
Windfall	540	0	135	135	135	135	0
Total	2917	454	714	733	627	389	1736

Appendix 2: Windfall (31 garden development on windfall)

	Year of delivery	Total completions in year A = (b + e)	Delivered as Windfall (including garden development) B =(a-e)	Delivered as windfall (excluding Garden Development) C = (b – d)	Delivered on Garden Land (d)	Delivered on Allocation E = (a-b)	% Windfall (including Garden Development) F= (b/a*100)	% Windfall (excluding Garden Development) G= (c/a*100)	% allocations
No adopted site allocations	2001/02	367	367				100%		0%
	2002/03	428	428				100%		0%
	2003/04	230	230				100%		0%
	2004/05	250	250				100%		0%
	2005/06	446	446				100%		0%
	2006/07	341	341				100%		0%
	2007/08	551	551				100%		0%
	2008/09	258	258				100%		0%
	2009/10	416	416				100%		0%
	2010/11	178	178	161*	17*		100%		0%
Sites adopted	2011/12	337	337	322*	15*	0	100%		0%
	2012/13	242	242	223*	19*	0	100%		0%
	2013/14	383	276	257	19	107	72%	67%	28%
	2014/15	503	363	315	48	140	72%	63%	28%
	2015/16	479	277	260	17	202	58%	54%	42%
	2016/17	442	283	252	31	159	64%	57%	36%
	TOTAL 2001-17	5851	5243			468			
	TOTAL 2008-17	3238	2630						
	TOTAL 2010-17	2564	1956 / 279 pa*	1790/256pa*	166 /24pa*				

*Includes estimates.

Table 2: New Dwellings in Rural Building Conversions.

Year of delivery	New Building Conversions permitted (A)	Removal of Holiday conditions permitted (B)	Total Potential New Dwellings Provided (C)
2012/13	10	3	13
2013/14	25	21	46
2014/15	66	16	82
2015/16	88	16	104
2016/17	33	22	55
Total	222	78	300
Average per annum	44	16	60

Table 3: Delivery of rural exceptions development.

Year of delivery	Rural exceptions sites – total built (A)
2001/02	0
2002/03	0
2003/04	0
2004/05	0
2005/06	15
2006/07	39
2007/08	10
2008/09	30
2009/10	20
2010/11	44
2011/12	22
2012/13	12
2013/14	48
2014/15	8
2015/2016	0
2016/2017	8
TOTAL	256

Projected windfall assumptions

2.32 In order to provide a cautious approach to estimating future supply the following allowances for each source of windfall have been made:

1. Infill and redevelopment = 100 dwellings per annum;
2. Conversion of buildings and removal of restrictive conditions = 10 dwellings per annum;
3. Rural exceptions developments (where sites are not yet identified) = 10 dwellings per annum;
4. Permitted development (where not time constrained) = 15 dwellings per annum.

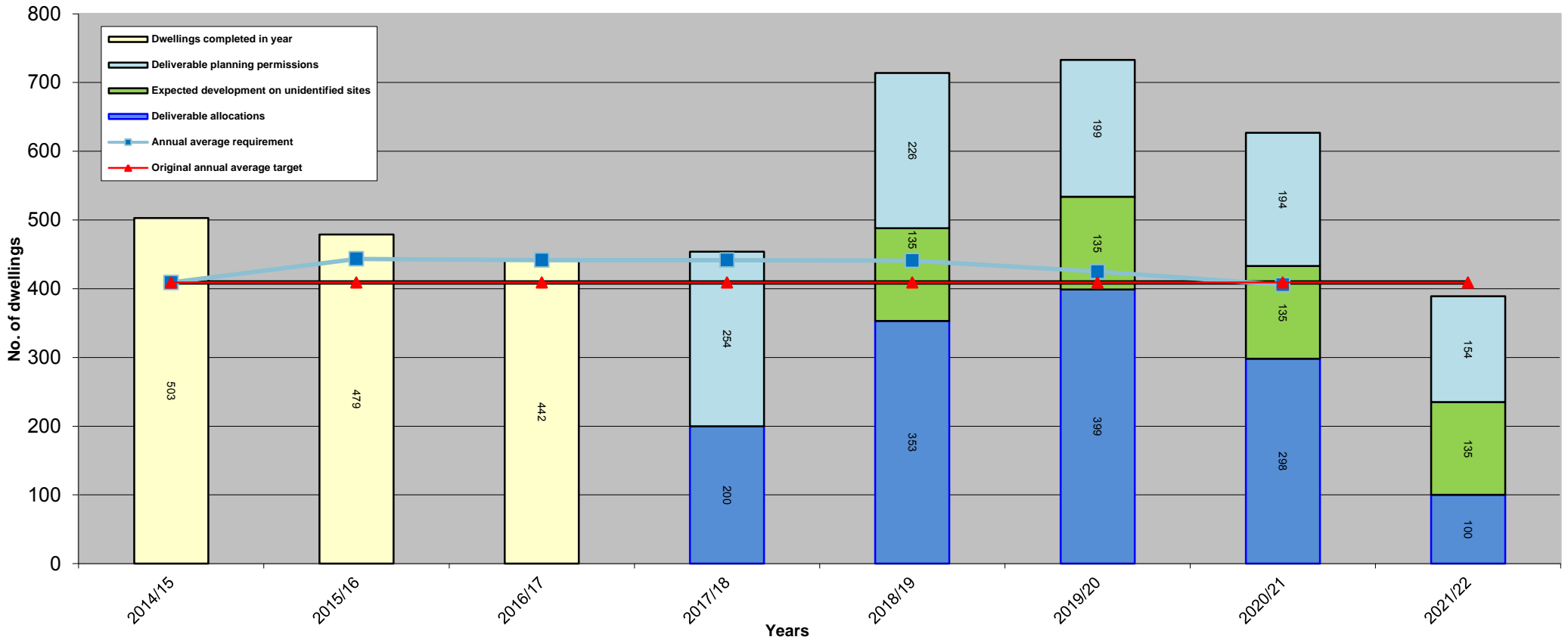
2.33 **This equates to a total of 135 dwellings per annum,** In comparison the average historical position of 256 between 2010 – 2017.

2.34 Given that current planning applications contain existing windfall development it is assumed that new windfall permissions for small scale development will not start to take effect until later. The windfall allowance has only been applied from the second year of the five year period.

Appendix 3: Housing Trajectory Table (April 2017)

	Built	Deliverable planning permissions	Expected development on unidentified sites	Deliverable allocations	Total	Original annual average requirement	Original cumulative requirement	Difference (average - completions)	Cumulative shortfall / surplus	Cumulative total
2014/15	503				503	409	409	94	+94	
2015/16	479				479	409	818	70	+164	
2016/17	442				442	409	1,227	33	+197	
2017/18		261		200	461	409	2,045			
2018/19		233	135	353	721	409	2,454			
2019/20		207	135	399	741	409	2,863			
2020/21		202	135	298	635	409	3,272			
2021/22		139	135	100	374	409	3,681			

Appendix 4 - Housing Trajectory 2017
Number of dwellings projected to be completed each year (1st April - 31st March)



Neighbourhood Plan Guidance.

Summary: This report provides guidance to support the preparation of neighbourhood planning In North Norfolk

Recommendations to Cabinet: That the guidance is published as additional source of supporting information in the production of neighbourhood planning in North Norfolk.

Cabinet Members(s)	Ward(s) Affected
All Members	
<p>Contact Officer(s), telephone number and email:</p> <p>Iain Withington (Planning Policy Team leader) 01263 516034</p> <p>iain.withington@north-norfolk.gov.uk</p>	

1. Introduction

1.1 The Localism Act reformed the planning system to enable local people more say in determining planning policy for their local area. A neighbourhood plan is intended to give local people the opportunity to decide the future of the places where they live and work by allowing communities to set out a vision for a designated area and the planning policies for the use and development of land. i.e. they can bring forward additional growth and or allocations for new homes, employment opportunities and seek to address other land use planning matters in the designated Neighbourhood Plan Area when supported by evidence.

- 1.2 North Norfolk District Council has a role in supporting the preparation of neighbourhood plans and is responsible for organising referendums and the independent examination. There is already a significant amount of guidance and advice available for neighbourhood planning groups both available nationally through Government backed neighbourhood planning web sites and professional planning bodies such as the RTPI which the Council has to date relied upon. However in order to assist in identifying the most appropriate advice a number of specific local guidance notes have been written covering information gathering, conformity matters and process requirements and are attached to this report. It is not the intention to repeat the guidance available but to provide useful signposting and process check sheets to aid the efficient production of neighbourhood planning and effective use of resources at the council and the sign posting of best practice.
- 1.3 Specifically Neighbourhood Plans are required to be in general conformity with the strategic policies of the Local Plan and the ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area¹ and have regard to national policies and advice.
- 1.4 Where policy elements are identified as not strategic, neighbourhood plans are able to shape and direct sustainable development in their area as long as they do not seek to duplicate existing non-strategic process and policies at a District and national level and the approach is justified through supporting evidence.
- 1.5 All neighbourhood plans must demonstrate this general conformity with the strategic policies and meet certain “Basic Conditions” before they can proceed..
- 1.6 The Council through the National Planning Policy Framework, NPPF paragraph 184 and the Planning Practice Guidance are **required to set out clearly their strategic policies. The intention is that guidance note two contained in the appendix provides the strategic framework for neighbourhood planning setting out the policy context for conformity tests by the Council and that of the independent examiner.** All neighbourhood plans must demonstrate this conformity and meet the “basic conditions”.
- 1.7 Neighbourhood Plans must also follow a specific legislative process; plans should not proceed where it is shown that these processes have not met the regulations. A number of check sheets have therefor been developed to assist

¹ National Planning Policy Framework para 184

communities and officers with the requirements of the legislation. These cover the documents required at pre submission stage – Regulation 14 and submission stage Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

2. Council Guidance

2.1. Appendix 1 contains two guidance notes and two check sheets as follows:

- Guidance Note 1: information covering general information from Locality, Planning Aid and the RTPI, funding links and links to national policy and guidance that are directly relevant to neighbourhood plan making. The guidance note also contains links to best practice guidance and some useful topic based information such as Community Land Trust and low carbon neighbourhood planning;
- Guidance Note 2: provides advice around conformity with the Strategic Policies and the required Basic Conditions tests. The Council will also use the table to assess emerging neighbourhood plans in its assessment of conformity;
- Check Sheet 1: provides a summary of the requirements at pre submission stage, covering procedural matters;
- Check Sheet 2: provides summary of the requirements at submission stage, covering procedural matters and advice on how to meet them.

2.2 The intention is that further guidance notes will be produced in due course covering specific areas where necessary.

3 Recommendations

That the guidance is published as additional source of supporting information in the production of neighbourhood planning in North Norfolk.

Appendix 1: Neighbourhood Planning Guidance

Neighbourhood Planning Guidance - July 2017

Guide to Information on Neighbourhood Planning - Useful links

Information on Neighbourhood Planning and Planning Policy in North Norfolk is published on the Council's planning policy web site. The planning web site is where the Local Plan (Core Strategy, Site Allocations and other Development Plan Documents), monitoring information and published evidence can be found.

<https://www.north-norfolk.gov.uk/section/planning/planning-policy/>

1-General information

Locality

<http://mycommunity.org.uk/take-action/neighbourhood-planning/>

Locality is the organisation that on behalf of the Government is fronting neighbourhood planning. Their web site is updated regularly and includes general advice around neighbourhood planning, step by step advice, support and grant information and under the specific [Resources tab](#) specific guidance ranging from a Neighbourhood Plan Road Map Guide ,Useful links for neighbourhood planners ,topic guidebooks such as low carbon planning, to specific "How to" guides which cover many of the main areas of neighbourhood planning such as: How to Commission Evidence, How to Undertake Site Assessments , How to Write Planning Policies and How to Work Constructively With your Local Planning Authority and how to apply for funding . There is plenty of support in these technical pages and we would encourage all to read and follow the sound advice.

There are many guidance documents in this section here are just a few:

[Quick Guide to Neighbourhood Planning](#)

[Neighbourhood Plan Road Map](#)

[Neighbourhood Plan Project Planner](#)

[Keeping It Simple](#)

[General conformity with strategic local planning policy](#)

[Screening Neighbourhood Plans for Strategic Environmental Assessments](#)

There are many more guidance documents available including: site allocation, funding, project planning, How to write a consultation statement and links to guidance and of course the legislation.... - visit the web site above.

2-FUNDING

Under the [Funding Option tab](#) there are details of the 2015 – 2018 grant support programme where grants of up to £9,000 are available, plus Technical Support packages provided by AECOM along with additional grant packages which bring the funding total to £15,000.

Groups that have “made” a neighbourhood plan can now also apply for additional funding to update their neighbourhood plans if it is potentially deemed to be out of date.

3-Planning Aid

Under the front of Planning Aid the Royal Town Planning Institute also supply advice and guidance. This includes links to submitted plans, referendum versions and examiners reports

At <http://www.ourneighbourhoodplanning.org.uk/resources>

A complete series of HOW TO guides are available and include:

- How to designate a Neighbourhood area;
- How to structure a Neighbourhood Plan;
- How to develop a vision and objective;
- How to gather and use evidence;
- How to write Planning Policies;
- How to engage and work constructively with your local Planning Authority.

The site also contains many notes, tips and tools advice.

National Planning Policy and Guidance

Neighbourhood Plans also need to be in general conformity with national planning and they should not duplicate approaches.

The National planning policies are contained in the National Planning Policy Framework (NPPF):

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

National planning policies for traveler sites are contained in the **Planning Policy for Traveler Sites** (PPTS) which should be read in conjunction with the NPPF, and can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6078/2113371.pdf

Advice and guidance issued by the Secretary of State is usually in the form of **Written Ministerial Statements and Judgments**. For example:

<http://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2016-12-12/HCWS346/>

<https://www.publications.parliament.uk/pa/cm201516/cmhansrd/cm150618/wmstext/150618m0001.htm>

4-National planning guidance is contained in the Planning Practice Guidance (PPG) which can be found here:

<http://planningguidance.planningportal.gov.uk/blog/guidance/>

The national Planning Practice Guidance (PPG) provides a comprehensive web based guidance for the planning system which all Plans and Programms should be in general conformity with. In many cases the guidance adds detail and interpretation of the NPPF which neighborhood planners need to conform with. eg for those neighbourhood plans considering site allocation or designation of Local Green Space the guidance provides criteria based methodologies that should be followed. Failure to apply these will result in non-compliance and have serious implications for the emerging Neighbourhood Plan.

Within the PPG Neighbourhood Planning has its own specific pages

[PPG - Neighbourhood Planning](#)

[Strategic environmental assessment and suitability appraisal](#)

[The Planning Advisory Service PAS](#)

The Planning Advisory Service, PAS also publish information about neighbourhood planning, though this has been reduced in recent times:

<https://www.local.gov.uk/pas>

<https://www.local.gov.uk/pas/policies-plans/dclg-neighbourhood-planning-case-studies>

5-DCLG Notes on Neighbourhood Planning

Regular bulletins from the Neighbourhood Planning Team at the Department for Communities and Local Government: [Notes on Neighbourhood Planning](#).

Edition 19 includes information on the Neighbourhood Planning Bill 2017 which has since received Royal Assent on 27April 2017.

6-Local Planning Authority Guidance

Guidance and updates on relevant neighbourhood Plans are available on multiple local authority websites

[NNDC](#) - the **identification of Strategic policies** required for neighbourhood planning conformity tests and other specific advice for neighbourhood planning in North Norfolk along with specific neighbourhood plan designations and relevant stages are published on the planning policy web site.

[Broadland District Council](#) - have published a useful guide explaining how to undertake neighbourhood planning in a step by step form. Download version 4 June 2016 by following the Neighbourhood Plan Guidance notes – Our advice KEEP IT SIMPLE.

[Herefordshire Council](#) – with one of the highest concentrations of neighbourhood planning (100+)in the country have produced over [30 useful guidance](#) notes on all aspects of neighbourhood planning.

[Breckland Council](#) - have produced some relevant guidance based on their experience of neighbourhood planning consolidating many of the how to guides and other publications above.

7-Useful Topic based information

[Guidebook for Low carbon neighbourhood planning](#)

[How to identify suitable areas of onshore wind energy in neighbourhood planning](#)

[Histrionic England Guidance](#) provide guidance on Sustainability appraisal and strategic environmental assessments and how to incorporate local heritage into a neighbourhood plan.

[Community Land Trusts](#) - or CLT's offer a mechanism supported by the council for local communities to bring forward housing schemes and for implementing policies in neighbourhood plans. If you are interested in bringing forward a community led housing scheme or allocating land for such through a neighbourhood plan for further information contact planning policy and or housing sections at NNDC.

There are national CLT officers and networks around the country - [Community land Trust East](#) is the local contact.

[Beauty in my Back Yard - BIMBY](#)

The BIMBY toolkit is specifically designed to help community's shape new housing via the neighbourhood planning process and adopt the outcomes as planning policy. Created by the Princes Foundation, this is a free on line resource that that aims to empower local

communities to engage positively in the planning process. Its purpose is to help bring communities, councils and developers together to create new developments that enrich the local area.

Conformity Advice - Basic Conditions and Strategic Policies

Background Context

This note provides those undertaking neighbourhood planning with advice around conformity with the strategic policies and the required Basic Conditions tests. In line with the National Planning Policy Framework, NPPF paragraph 184 and the Planning Practice Guidance¹ local planning authorities are required to set out clearly their strategic policies. This guidance note provides the strategic framework for neighbourhood planning, sets out the policy context for conformity tests by the local authority and that of the independent examiner. All neighbourhood plans must demonstrate this conformity and meet certain “basic conditions”.

Paragraph 184 of the National Planning Policy Framework (NPPF) states that:

“The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

Paragraph 185 goes on to say that:

“Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area.”

A neighbourhood plan can seek to add local distinction to reflect the specific Neighbourhood Area as long as the approach is **justified and evidenced**. Neighbourhood plans should **address the issues in each defined area** (i.e. they are locally distinctive) **and add value** to the existing policy framework. They should not repeat national policy or seek to duplicate existing non-strategic process and policies. Local Plan policies are part of the development plan and will be taken into consideration whether they are included in your neighbourhood plan or not. Neighbourhood plans can include policies that differ from non-strategic local planning policies and or introduce new policies -providing they are in general conformity with the strategic priorities and strategic local planning policies.

It is also important to remember that **only policies dealing with land use** can form part of a neighbourhood plan.

The Council would encourage neighbourhood plan groups to seek early and continuous engagement and dialogue around emerging neighbourhood plans topic areas and policy wording and seek informal feedback during its development and prior to the formal pre submission consultation – which is required under regulation 14 of the Neighbourhood Planning (General) Regulations 2012. It is at this stage that formal comments on the approach, structure, content and policies will be given.

Following the pre submission consultation and once the Council has received a proposed plan under Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012 the Council is required to

¹ National Planning Practice Guidance Paragraph: 077 Reference ID: 41-077-20140306

formally review the proposed plan and submission documents against the Legal Framework. Once satisfied that this has been followed it will then invoke Regulation 16 which consists of publishing the proposed neighbourhood plan, seeking representations on it from those who live, work or carry on business in the Neighbourhood Area and appointing an independent examiner who will assess whether the plan meets the basic conditions and recommends whether or not the plan should proceed to referendum.

The examiner may recommend modifications that are necessary to ensure that the plan meets the basic conditions, before proceeding to referendum. Significant modifications may trigger a need to return the plan to an earlier stage.

The examiner's report carries considerable weight, but it is not binding. The local authority has the final responsibility for determining whether the plan meets the basic conditions, whether any modifications are necessary and should be consulted on, and consequently whether to proceed to the referendum stage.

It is therefore important that there is an understanding early on around conformity with the basic conditions and the existing development plan.

1-Basic Conditions

Only a draft Neighbourhood Plan that meets **each** of the set of "Basic Conditions" can be put to a referendum and be "made". The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions for *Neighbourhood Development Plans* are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the plan contributes to sustainable development;
- **the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);**
- the making of the plan does not breach, and is otherwise compatible with, EU obligations;
- prescribed conditions are met in relation to the Order (or neighbourhood plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).
- In addition neighbourhood plans must be compatible with Human Rights requirements.

The national Planning Practice Guidance (PPG) provides comprehensive web based guidance for the planning system which all Plans and Programmes should be in general conformity with. In many cases the guidance adds detail and interpretation of the NPPF which neighbourhood planners need to conform with e.g. for those neighbourhood plans considering additional site allocation or designation of Local Green Space the guidance provides criteria based methodologies that should be followed. Failure to apply these will result in non-compliance and have serious implications for the emerging Neighbourhood Plan.

The PPG at [Reference ID: 41-074-20140306](#) advises that the basic condition relating to 'general conformity' with strategic policies contained in the Local Plan should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with;
- The degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;

- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;
- the rationale for the approach taken in the draft neighbourhood plan and the evidence to justify that approach.

District Development Plan and emerging Local Plan

Legislation² requires that decisions are made in accordance with the Development Plan unless material considerations indicate otherwise.

The Development Plan for North Norfolk Currently comprises:

- The Core Strategy incorporating Development Management Policies 2008;
- The Site Allocations DPD, 2011;
- The North Norfolk Design Guide, Supplementary Planning Document, SPD, 2008;
- The North Norfolk Landscape Character Assessment, SPD2009;
- The adopted Norfolk Minerals and Waste Development Framework 2010 – 2026.

Further information on the Development Plan is available at:

<https://www.north-norfolk.gov.uk/section/planning/planning-policy/>

Emerging Local Plans

An emerging Local Plan would not constitute part of the statutory development plan. However, it still needs to be considered by neighbourhood planning bodies.

- The more developed an emerging Local Plan is the more weight it carries;
- The evidence behind an emerging Local Plan remains relevant and is likely to form part of the evidence base for any neighbourhood plans within the local plan area;
- Where local and neighbourhood plans have conflicting policies, the later plan will carry more weight. To avoid the risk of policies in a neighbourhood plan being superseded by a later local plan, it is necessary for the two plans to work in a complementary way.

Government advice is clear and the Planning Practice Guidance states that:

Where a neighbourhood plan is brought forward before an up to date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging Local Plan*

² Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990

- *the adopted development plan*

with appropriate regard to national policy and advice

The council would encourage all neighbourhood plan groups to seek early and consistent engagement throughout the process of writing a neighbourhood plan.

2 - The Strategic Policies

Guidance is provided at national level for identifying strategic policies both within the National Planning Policy Framework (NPPF) – paragraph 156 and the National Planning Practice Guidance (NPPG) (paragraph 074 - 077 Ref ID: 41-074-20140306). The Council has used this to identify the strategic policies in the adopted development plan for North Norfolk as detailed below. It is also worth noting that the Strategic Policies of the Council are changing and in order to future proof any emerging Neighbourhood Plan should have regard to and also be in general conformity with the emerging Local Plan. Similarly Local Plans should not seek to duplicate non-strategic approaches detailed in neighbourhood plans. It is recommended that close dialogue is maintained with the Council around emerging policy areas.

Criteria 1-5, contained in the NPPF and criteria A-F contained in the national PPG have been used to identify the Strategic Policies contained in the North Norfolk Development Plan.

The NPPF, para 156 states that.

Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

1. *the homes and jobs needed in the area;*
2. *the provision of retail, leisure and other commercial development;*
3. *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
4. *the provision of health, security, community and cultural infrastructure and other local facilities; and*
5. *climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.*

Paragraph 184 goes on to state that ... **Neighborhood plans should reflect these policies...and plan positively to support them.**

When reaching a view on whether a policy is a strategic policy the national PPG states that the following are useful considerations:

- A. *whether the policy sets out an overarching direction or objective;*
- B. *whether the policy seeks to shape the broad characteristics of development; the scale at which the policy is intended to operate;*
- C. *whether the policy sets a framework for decisions on how competing priorities should be balanced;*

- D. whether the policy sets a standard or other requirement that is essential to achieving the wider vision and aspirations in the Local Plan;
- E. in the case of site allocations, whether bringing the site forward is central to achieving the vision and aspirations of the Local Plan;
- F. whether the Local Plan identifies the policy as being strategic

Where policy elements are identified as not strategic, neighbourhood plans **will be able to shape and direct sustainable development in their area as long as they do not seek to duplicate existing non-strategic process and policies at a local and national level and the approach is justified through supporting evidence.** Some policies of the Development Plan although not strategic in their entirety do contain elements that reflect and support the overarching strategic approach. In such cases neighbourhood plans could seek to add further elements of local distinctiveness, however it is recommended that options and topic areas are discussed with the Planning Policy team during policy formation and that there is adequate justification and evidence to substantiate proposed approaches

The Council will use the following table to assess emerging neighbourhood plans in its assessment of conformity.

List of Strategic policies

Policy In DPD		Comments	NPPF Guidance	PPG Guidance
SS1	Spatial Strategy for North Norfolk	Strategic policy.	1	A,B,C,D,F
SS2	Development in the Countryside	Strategic policy	1	A,B,C,F
SS3	Housing Distribution	Strategic policy	1	A,B,C,D,F
SS4	Environment	Strategic policy	5	A, C, D,F
SS5	Economy	Strategic policy	1	A,C,D,F
SS6	Access and Infrastructure	Strategic policy	3	A, B, F
SS7- 14	Town Strategies	Strategic policy	2,3,4	A,B,D,F
HO1	Dwelling Mix &Type	Part strategic Policy setting overarching objective. Policy that local community could, in part add local distinctiveness subject to appropriate evidence and general conformity to strategic elements.		A,B,D
HO2	Affordable Housing	Strategic Policy	1	A,C,D,E
HO3	Affordable Housing In the countryside	Part Strategic Policy setting overarching objective which should be met as a minimum Policy that local community could, in		B, D

		part add local distinctiveness subject to appropriate evidence and general conformity to strategic elements		
HO4	Sites for Gypsies & Travelers and Travelling Showpeople	Strategic Policy	1	A,B,C
HO5	Agricultural, Forestry and other Occupational Dwellings in the Countryside	Policy that local community add local distinctiveness subject to appropriate evidence and alignment to national policies		
HO6	Removal of Agricultural, Forestry and other occupancy conditions	Policy that local community could add local distinctiveness subject to appropriate evidence and alignment to national policies.		
HO7	Making the most efficient use of Land (Density)	Strategic	1	A,B,C
HO8	House extensions and replacement dwellings in the countryside	Policy that local community could add local distinctiveness subject to appropriate evidence		
HO9	Conversion and re use of rural buildings as dwellings Updated December 2012	Strategic policy		A, B, C
EN1	Norfolk Coast Area of Outstanding Natural Beauty and the Broads	Strategic policy	5	A,B,C,D
EN2	Protection and Enhancement of landscape and Settlement Character	Strategic policy	5	A,B
EN3	Undeveloped Coast	Strategic policy		A,B,C
EN4	Design	Part strategic policy seeking to shape broad characteristics of development. Policy that local community could, in part add local distinctiveness subject to appropriate evidence and general conformity to strategic elements		B,D
EN5	Public Realm	Policy that local community could add local distinctiveness subject to appropriate evidence		
EN6	Sustainable Construction and Energy Efficiency	Policy that local community could add local distinctiveness subject to appropriate evidence and alignment to na-		

		tional policies ³		
EN7	Renewable Energy	Policy that local community could add local distinctiveness subject to appropriate evidence		
EN8	Protecting and Enhancing the Historic Environment	Strategic policy	5	A,B
EN9	Biodiversity & Geology	Strategic policy	5	A
EN10	Development and Flood Risk	Strategic policy	3,5	A,C
EN11	Coastal Erosion	Strategic policy	3	C
EN12	Relocation and replacement of development affected by Coastal Erosion Risk	Strategic policy	3,5	A, B,C
EN13	Pollution and Hazard Prevention and Minimisation	Strategic policy	5	A,B,C
EC1	Farm Diversification	Policy that local community could add local distinctiveness subject to appropriate evidence		
EC2	The re use of Buildings in the Countryside	Strategic Policy		A, B, C
EC3	Extensions to Existing Businesses in the countryside	Policy sets in part an overarching direction. Policy that local community could in part add Local distinctiveness subject to appropriate evidence	1	A,B
EC4	Redundant Defense Establishment	Policy sets in part an overarching direction. Policy that local community could in part add Local distinctiveness subject to appropriate evidence & subject to adherence to strategic policies on location of sustainable development		A,B,C
EC5	Location of Retail and Commercial Leisure Devel-	Strategic Policy	2	A,C

³ Note: National policy allows only prescribed standards through the new technical standards applied through Building Regulation to be enacted through Local Plans and Neighbourhood Plans.

	opment			
EC6	Public car parking provision	Strategic Policy	4	A
EC7	The location of New Tourism Development	Strategic Policy	2	A, B
EC8	Retaining an Adequate Supply and Mix of Tourist Accommodation	Strategic Policy	2	C
EC9	Holiday and Seasonal Occupancy Conditions	Policy that local community could add local distinctiveness subject to appropriate evidence		
EC10	Static and Touring caravan and Camping Sites	Strategic Policy	2	B,D
CT1	Open Space Designations	Policy sets in part an overarching direction. Policy that local community could in part add local distinctiveness subject to appropriate evidence and general conformity with overarching policies ⁴	5	A,C
CT2	Developer Contributions	Strategic Policy	1,2,3,	A, B,D
CT3	Provision and Retention of Local Facilities and Services	Policy that local community could review adding local distinctiveness subject to appropriate evidence		
CT4	Telecommunications	Strategic Policy	3	A,C
CT5	The Transport impact of New Development	Strategic Policy	5	A,C
CT6	Parking Provision (Standards)	Policy that local community could add local distinctiveness subject to appropriate evidence		
CT7	Safeguarding Land for Sustainable Transport Uses	Policy setting overarching objective around sustainable transport links Policy that local community could in part add Local distinctiveness subject to appropriate evidence and general conformity to strategic elements	3,4,5	C

⁴ Neighbourhood plans can seek to designate Local Green Space through an assessment in compliance with guidelines issued in national policy and guidance

Policy in Site Allocations DPD				
C01-WEY09	Site allocations	Strategic policies and allocations ⁵	1,2,3,4,5	A,B,C,& or E,F
Tattersett Business Park	Employment land at Tattersett Business Park	Strategic for the delivery of jobs and employment uses that may otherwise be difficult to accommodate elsewhere.	1	A,B,

3 - Other matters

- By law Neighbourhood Plans cannot deal with minerals or waste issues;
- Neighbourhood planning has its own set of Regulations which set out the legal matters relating to the neighbourhood planning process. These are:
 - [The Neighbourhood Planning \(General\) Regulations 2012;](#)
 - [The Neighbourhood Planning \(General\) \(Amendment\) Regulations, 2015;](#)
 - [The Neighbourhood Planning \(General\) and Development Management Procedure \(Amendment\) Regulations, 2016;](#)
 - [The Neighbourhood Planning Act, 2017;](#)
 - [The Neighbourhood Plan \(Referendums\) Regulations, 2012;](#)
 - [The Neighbourhood Planning \(Referendums\) \(Amendment\) Regulations 2013](#)
 - [The Neighbourhood Planning \(Referendums\) \(Amendment\) Regulations 2014](#)
 - [The Neighbourhood Plan \(Referendums\) \(Amendment\) Regulations, 2016;](#)
 - [The Neighbourhood Planning \(Prescribed Dates\) Regulations, 2012.](#)
- Legislation can be obtained at <http://www.legislation.gov.uk/>

⁵ Neighbourhood plans can seek to plan positively for growth and allocate additional growth subject to general conformity with the strategic policies. Particular attention should be given to the overall spatial strategy.

Neighbourhood Planning Pre Submission Check Sheet – July 2017

The following checklist has been produced to assist you with the requirements of the Neighbourhood Planning Regulations:

Pre Submission and Publicity - Regulation 14

Ongoing discussions are encouraged between yourselves and the council before finalising and publicising the consultation document. This will enable the Council to advise not only on the correct requirements but informally on the content and conformity prior to requesting formal comments on the emerging plan at regulation 14 stage.

Pre Submission Check Sheet

Requirement	Check
Pre submission version signed off for consultation by responsible body (The Parish Council).	
Advertised the emerging plan within your Neighbourhood Area in a way to ensure that all residents, business or people that work or have an interest in the area are aware of the proposals.	
Set a clear consultation period of at least 6 weeks.	
Made clear where a hard copy of the plan can be seen, & electronic copy downloaded from.	
Made clear how people can make comments and the period allowed.	
Formally invited/consulted with any statutory body who's interest may be affected by proposals in your emerging plan. i.e specific invitation setting out the consultation period and copy/ link to the emerging neighbourhood plan consultation document and supporting evidence - NNDC can supply a list of statutory consultees.	
Sent a copy of the consultation document to the local authority planning team /nominated officer.	
Sent draft copies of any Strategic Environmental Assessment and Habitats Regulations Assessment to the local authority planning team / nominated officer.	
Published document and supporting evidence on Neighbourhood Plan / parish council web site and advised how to comment and where to obtain a copy.	

Neighbourhood Planning Submission Check Sheet – July 2017

The following checklist has been produced to assist you with the requirements of the Neighbourhood Planning Regulations:

Submission of your proposed Neighbourhood Plan - Regulation 15

Ongoing discussions are encouraged between yourselves and the Council before finalising the proposed plan and formally submitting it in order to ensure that the emerging proposed plan is meeting all the requirements and the correct procedures are being followed as you progress. Any comment received at pre submission stage should be considered and where necessary, the proposed neighbourhood Plan amended. The comments received should be consolidated into a schedule which summarises the comment, who made it and how it has been taken into consideration along with a brief report describing how the plan has been modified in relation to the issues raised and made available for viewing. This then forms part of the Consultation Statement detailed below.

In addition there are specific requirements and documentation required at submission stage which must be adhered to.

Requirement	Check
A map showing the area which your proposed plan will cover – Your designated Neighbourhood Plan Area	
The proposed Neighbourhood Plan	
<p>A Consultation Statement. The focus of this statement should be the 6 week statutory consultation and detail how this consultation has been taken into account and informed the proposed plan. It is about demonstrating that those producing the plan have considered and addressed the issues raised during the consultation, and that it has been done in a transparent way.</p> <p>It should include a summary of previous consultations that informed the content of the plan and detail how these issues were considered. Note that although consultation may highlight an issue it is the evidence that underpins an approach at that substantiates it.</p>	
<p>The consultation Statement should contain:</p> <ul style="list-style-type: none"> • Details of the people and organisations consulted at each stage of consultation; • Details of how they were consulted; • Summaries of the main issues and concerns raised at each stage; • Details of how the issues have been considered and where relevant addressed in your proposed plan - it is recommended that a 	

<p>summary schedule of comments is produced which covers who what and how taken into account for each policy.</p>	
<p>A Basic Conditions and other legal requirements statement. This needs to include details in order demonstrate how the proposed neighbourhood plan meets each of the basic conditions and confirm that the plan meets the legal requirements.</p>	
<ul style="list-style-type: none"> • The Basic Conditions Statement should contain details of how the proposed plan: <ul style="list-style-type: none"> ○ Has regard to national policy; ○ Contributes to achieving sustainable development (the council recommend that a sustainability appraisals is undertaken not only to inform the preparation of the neighbourhood plan to but to substantiate this statement); ○ Is in general conformity with the strategic polices contained in the suit of documents that comprise the North Norfolk Local Plan and the emerging Single Local Plan; ○ Is compatible with EU obligations and human rights requirements. <p>The statement needs to confirm that the proposed plan meets other legal requirement such as:</p> <ul style="list-style-type: none"> • The proposed plan is being submitted by the qualifying body (as defined in the ACT); (i.e ratified by the Parish Council) • The proposed plan states the period for which it is to have effect; • Confirm that the policies do not relate to “excluded development” • Confirm that the proposed plan does not relate to more than one neighbourhood area; • Confirm that there are no other neighbourhood plans in place within the Neighbourhood Plan Area. 	
<p>Any relevant supporting information - evidence base.</p> <p>It is recommended that the submission included supporting material such as:</p> <ul style="list-style-type: none"> • The application and designation of the Neighbourhood Area; • Conformation from the parish council as the qualifying body that they have authorised the submission and; • Any evidence which supports and informs the proposed plan and Basic Conditions Statement. 	
<p>It is good practice and expected to ensure the submission documents and evidence used to inform the plan remains publically available and easily accessible, such as on the neighbourhood plan web site.</p>	