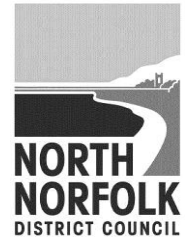


Planning Policy & Built Heritage Working Party



Please Contact: Linda Yarham

Please email: linda.yarham@north-norfolk.gov.uk

Direct Dial: 01263 516019

8 February 2018

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 19 February 2018 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 [here](#) or from Democratic Services, Tel: 01263 516010, Email: democraticservices@north-norfolk.gov.uk

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

Emma Denny
Democratic Services Manager

To: Mrs S Arnold, Mrs A Fitch-Tillett, Ms V Gay, Mrs A Green, Mrs P Grove-Jones, Mr J Punchard, Mr R Reynolds, Mr S Shaw, Mr N Smith, Mrs V Uprichard, Ms K Ward

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

Heads of Paid Service: Nick Baker and Steve Blatch
Tel 01263 513811 **Fax** 01263 515042 **Minicom** 01263 516005
Email districtcouncil@north-norfolk.gov.uk **Web site** www.north-norfolk.gov.uk

AGENDA

1. APOLOGIES FOR ABSENCE

To receive apologies for absence, if any.

2. PUBLIC QUESTIONS

3. MINUTES

Page 7

To approve as a correct record the Minutes of a meeting of the Working Party held on 11 December 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. Norfolk Strategic Planning Framework

Page 11
(Appendix 1 - Page 17)

Summary: This report provides an update on the preparation of the Norfolk Strategic Planning Framework following a recent consultation and recommends that the Council formally endorses the document.

Conclusions The framework is intended to help inform the preparation of the next round of Local Plans across the county, it includes a number of agreements between all planning authorities in Norfolk in relation to strategic land use planning issues which cross the administrative boundaries of District Councils and demonstrates how the planning authorities meet one of the key legal tests at Local Plan examination (the duty to co-operate). The partner authorities have committed to a process of on-going review to ensure the framework continues to develop and is kept up to date. The framework has been amended following consultation and officers consider it should be endorsed.

Recommendations: **This report recommends that the Working Party recommend to Cabinet that the Framework document is formally endorsed and that the Council welcomes further on-going cross boundary co-operation, and indicates those areas where the Council would favour further joint working.**

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

7. Brownfield Land Register Update

Page 89
(Appendix 2 – page 92)

Summary: This report provides an update to progress on the preparation and publication of the Brownfield Land Register.

Recommendations: **That the progress is noted and to agree to the recommended approach not to undertake Part 2 of the register at this time.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Sarah Tudhope, 01263 516011 sarah.tudhope@north-norfolk.gov.uk	

8. Holt Neighbourhood Plan Pre Submission Consultation

Page 97
(Appendix 3 (online only); Appendix 4 – page 102)

Summary: The report provides an update on the consultation version of the Holt Neighbourhood Plan and officers' response.

Recommendations to Cabinet:

- 1. That the Council welcomes and supports the progress that has been made.**
- 2. That Appendix 4 is agreed as the basis for this Council's response to the consultation.**

Cabinet Members(s)	Ward(s) Affected
All Members	Holt
Contact Officer(s), telephone number and email: Iain Withington (Planning Policy Team leader) 01263 516034	

9. Housing & Economic Land Availability Assessment (Part 2)

Page 124
(Appendices 5 & 6 (online only))

Summary: This report provides updated evidence to inform the preparation of the Local Plan. The Housing Economic Land Availability Assessment Part 2 has been prepared to determine the employment land supply from identifiable land in North Norfolk over the next 20 years.

Conclusions: That the report is published as a source of information to support the emerging Local Plan.

Recommendations: **This report recommends that the Working Party recommend to Cabinet:**

- a) To accept and publish HELAA Part 2 which covers employment land as a source of evidence to support the emerging Local Plan for North Norfolk to cover the period 2016-2036.**
- b) That delegated authority is given to Planning Policy Manager to undertake minor amendments to the report and associated mapping in order to publish.**

Cabinet Member(s)	Ward(s) affected
ALL Members	All Wards
Contact Officer, telephone number and email: Stuart Harrison, Planning Policy Officer. 01263 516308. stuart.harrison@north-norfolk.gov.uk	

10. Local Plan – Approach to Amenity Land

Page 129
(Appendices 7 & 8 (online only))

Summary: The background evidence paper provides a review of open land designations to inform the preparation of the emerging Local Plan. The study will inform the emerging Local Plan with final proposals undergoing public consultation as part of the consultation on the 1st Draft Plan Regulation 18 consultation. This document will form part of the background evidence.

Conclusions That the report is published as a source of information to support the emerging Local Plan

Recommendations: **This report recommends that the Working Party recommend to Cabinet to accept and publish the Amenity Green Space Topic paper as a source of evidence to inform the emerging Local Plan for North Norfolk to cover the period 2016-2036.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 iain.withington@north-norfolk.gov.uk	

11. Site Assessment Process

Page 133
(Appendix 9 – page 138)

Summary: The purpose of this report is to inform Members of the proposed process for Site Assessment and agree the timetable for the selection of preferred options for inclusion in the emerging Local Plan consultation

Recommendations:

- **That Members consider the contents of this report and the proposed site review methodology is used as a basis for future site assessment in the emerging Local Plan**
- **That Members agree the proposed methodology as a basis for future site selection and agree the proposed site visit dates.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Jodie Rhymes , 01263 516304 jodie.rhymes@north-norfolk.gov.uk	

12. Local Plan Spatial and Housing Strategies – Preparing strategies for consultation

Page 153

(Appendix 10 – page 175; Appendix 11 – page 176)

- Summary: This report considers the options that could be taken in the new Local Plan in relation to the overarching Spatial Strategy and the Housing Strategy including the quantity of new homes in the District, their distribution and the policy approaches which could be used to manage the delivery of the required development. A Member steer is sought to inform further work.
- Conclusions: A number of reasonable options will need to be subject to detailed Sustainability Appraisal and public consultation before the final approach for the Local Plan is agreed. The options identified in this report are being presented for discussion and to provide a steer for further policy development
- Recommendation: **That the Working Party recommends to Cabinet that the options identified in this report are subject to further development and Sustainability Appraisal prior to public consultation and that the Council indicates that, pending this further work, its preferred/intended approaches are:**
- a) **An overarching Spatial Strategy based on three defined geographical areas (West, East and Central North Norfolk) with growth focussed around existing settlements and that the strategy recognises the specific issues facing the coast.**
 - b) **A Housing Strategy which seeks to deliver not less than 9,000 dwellings over the 20 year plan period of which around 3,500-4,000 will be provided for on allocated sites, and around 2,000 (21% subject to viability) of which will be affordable, with specific provision made to address the needs of elderly people.**
 - c) **A distribution of development based on a five tier settlement hierarchy (Large Growth Towns, Small Growth Towns, Service Villages, Villages and Countryside) with acceptable locations for development defined via the use of development boundaries in Growth Towns and Service Villages, designated residential areas, and specific allocations of residential land.**
 - d) **The acceptance of rural building conversions to residential use across the district (a separate report will be prepared on the detail of a rural buildings policy).**
- Continued application of a rural exceptions policy to the delivery of affordable homes and acceptance of a proportion of market housing within such schemes (a separate report will be prepared on the detailed approach to affordable homes).**

Cabinet Member(s) – Cllr Sue Arnold	Ward(s) affected
--	------------------

All members	All Wards
Contact Officer, telephone number and email: Mark Ashwell, 01263 516325, mark.ashwell@north-norfolk.gov.uk	

13. 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.”

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

11 DECEMBER 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)
J Punchard (Vice-Chairman)

Mrs A Fitch-Tillett	R Reynolds
Ms V Gay	S Shaw
Mrs A Green	Mrs V Uprichard
Mrs P Grove-Jones (from 11.00 am)	Ms K Ward

Observers:

Mrs A Claussen-Reynolds
N Pearce
Ms M Prior
J Rest

Officers

Mr I Withington – Planning Policy Team Leader
Mr S Harrison – Planning Policy Officer

44. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor N Smith.

45. PUBLIC QUESTIONS

None.

46. MINUTES

The Minutes of the meeting held on 13 November 2017 were approved as a correct record and signed by the Chairman.

47. ITEMS OF URGENT BUSINESS

There were no items of urgent business.

48. DECLARATIONS OF INTEREST

None.

49. UPDATE ON MATTERS FROM THE PREVIOUS MEETING

The Planning Policy Team Leader reported that the Landscape Character Sensitivity Assessment was being prepared.

50. LOCAL PLAN – SETTLEMENT PROFILES

The Planning Policy Officer presented the report, which provided an introduction to the settlement profiles and village assessments and provided information on the demographic make-up of town and village settlements within the District. The settlement profiles included information on topics such as population structure, economic base, housing, health, education and the level of services. This information provided base line information to inform the Local Plan and also information to town and parish councils which were undertaking neighbourhood planning.

The Officers answered questions and gave further clarification where necessary.

Councillor Ms K Ward referred to a request at an earlier meeting to include broadband and mobile communications in the assessment.

The Planning Policy Officer explained that given the range of providers and variable service quality of mobile and broadband it was considered best not to include this information in the individual settlement profiles.

The Chairman stated that the County Council was putting pressure on broadband providers and it was important that the pressure was maintained. She referred to the headline statistic in the District profile relating to the percentage of people working from home being higher than in England as a whole, and stated that it was important that technology was right to enable this to grow.

Councillor J Rest stated that “working from home” did not necessarily mean having an office at home but also included people whose businesses were registered at their home address but worked away from it.

Councillor J Punchard considered that figure of 31 square miles covered by SSSI designations quoted in the North Norfolk District Profile appeared to be low.

The Planning Policy Officer explained that the figure was taken from a County-wide environmental assessment and stated that he would check this.

Councillor Ms V Gay asked if travel to work statistics would be available.

The Planning Policy Officer explained that there was more information available in the Census. The figures in the document presented to the Working Party was intended as a snapshot to inform the settlement profile.

Councillor Ms Gay asked if the snapshot would be updated. She commented that the statistics for North Walsham showed a number of vacant premises which she was aware would soon be taken up.

The Planning Policy Team Leader explained that the statistics would be updated when an Annual Monitoring Report (AMR) was produced. An AMR had not been produced in the current year due to lack of resources. This would be a task for the newly recruited monitoring officer.

The Planning Policy Team Leader stated that retail policies were quite restrictive in terms of the type of businesses allowed in town centres. Ways to reduce vacancy rates through planning policy would be discussed when considering the retail policy.

The Committee noted the report.

51. LOCAL PLAN – STRATEGIC FLOOD RISK ASSESSMENT

The Planning Policy Team Leader presented a report relating to the North Norfolk level 1 SFRA. The study updated the existing evidence base in line with national legislation and stakeholder requirements, provided an understanding of flood risk from all sources in order to provide robust, sound and up to date baseline evidence to inform the preparation of the emerging Local Plan. This would allow for informed choices taking flood risk into account, including the sequential location of development and development management decisions. He outlined the main findings and presented the associated maps and GIS layers.

The report recommended that the Working Party recommend to Cabinet to note the contents and publish the 2017 Level 1 Strategic Flood Risk Assessment (SFRA) including the associated PDF mapping and GIS layers as a source of evidence to support the emerging Local Plan for North Norfolk and be used as a basis of information across the District.

Councillor J Punchard considered that a major problem was lack of drain clearance by the County Council. “100 year” events were not every 100 years and river levels were being increased.

The Chairman suggested that pressure needed to be put on the County Council to deal with this issue. It was agreed that this was a matter for Overview and Scrutiny Committee to consider.

Councillor Mrs A Fitch-Tillett stated that she was the Environment Agency’s appointee on the Regional Flood and Coastal Committee (RFCC). The Environment Agency was also concerned at the lack of progress by NCC and she was pleased that this matter would be considered by Overview and Scrutiny Committee.

It was noted that work was yet to be carried out to put the flooding layers onto the GIS system. A request had been made to IT to carry out this work.

Councillor Ms K Ward stated that a representative of IT would be attending the O&S Committee in January and she would request a specific update on this matter.

Councillor R Reynolds stated that the flood maps were very important as insurance calculations were based on them and it was correct to push for this to be done.

RESOLVED

To RECOMMEND that Cabinet notes the contents and publish the 2017 Level 1 Strategic Flood Risk Assessment (SFRA) including the associated PDF mapping and GIS layers as a source of evidence to support the emerging Local Plan for North Norfolk and be used as a basis of information across the District.

52. LOCAL PLAN – APPROACH TO AMENITY LAND

The Planning Policy Team Leader presented a report which gave an update on progress on the review of open space designations and the work currently being undertaken to identify suitable Local Green Space. It was intended is to prepare a topic paper detailing the proposed Amenity Space designations and Education/Formal Recreation Areas and proposed Local Green Space and the alternatives considered. These preferred options and alternatives would form part of

the first Draft Plan regulation 18 consultation, where the suitability of the sites identified for designation, as well as any observations on those sites where designation had been judged unnecessary or inappropriate would be available for comment.

In answer to Members' questions, the Planning Policy Team Leader explained that development would not be permitted on Local Green Space unless it enhanced the open character or recreation use of land. Designation could not be used as a tool to prevent the development of a site. Private land areas could be important to the character and setting of a settlement and those already designated as open space under the current Local Plan would be reviewed.

The Working Party noted the report.

The meeting closed at 11.25 am.

CHAIRMAN

Norfolk Strategic Planning Framework

Summary: This report provides an update on the preparation of the Norfolk Strategic Planning Framework following a recent consultation and recommends that the Council formally endorses the document.

Conclusions The framework is intended to help inform the preparation of the next round of Local Plans across the county, it includes a number of agreements between all planning authorities in Norfolk in relation to strategic land use planning issues which cross the administrative boundaries of District Councils and demonstrates how the planning authorities meet one of the key legal tests at Local Plan examination (the duty to co-operate). The partner authorities have committed to a process of on-going review to ensure the framework continues to develop and is kept up to date. The framework has been amended following consultation and officers consider it should be endorsed.

Recommendations: **This report recommends that the Working Party recommend to Cabinet that the Framework document is formally endorsed and that the Council welcomes further on-going cross boundary co-operation, and indicates those areas where the Council would favour further joint working.**

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

1. Introduction

1.1 When preparing Local Plans the authority is subject to a number of legal and regulatory requirements. Amongst these the council must discharge a legal duty to co-operate with neighbouring authorities in relation to strategically important land use issues which cross administrative boundaries. The result of such co-operation is expected to be better planning outcomes. Compliance with this requirement is one of the legal tests which the Inspector will apply at Local Plan examination.

1.2 The Norfolk Authorities have a strong track record of working together with the most formal example being the preparation of a single local plan to cover Norwich, Broadland and South Norfolk planning authority areas. In 2015 a new county wide Strategic Planning Member forum was established with terms of

reference to ensure that the duty to co-operate was effectively discharged. These can be seen at <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/norfolk-strategic-planning-member-forum>.

- 1.3 All authorities in Norfolk including the county council participate in the Member forum which is supported via an officer team drawn from the councils. The forum sought and gained agreement from each of the partner authorities to prepare a framework document. Cabinet subsequently resolved to agree to co-operate on strategic planning matters through the preparation of a shared non-statutory strategic framework.

2. The Process of Preparation of the Framework

- 2.1 Following the agreement to prepare a shared non-statutory strategic framework the authorities agreed to the appointment of project management resource to co-ordinate joint planning activity. This resource, which is hosted at Norwich City Council, commenced work in late 2015 and throughout 2016 co-ordinated the work of four separate task groups which drew together evidence relating to the local economy; housing; infrastructure and the environment and delivery matters on which the framework was to be based.
- 2.2 This process led to the joint Member Forum considering first drafts of a vision and objectives in October 2016 to guide the subsequent drafting of the document and a consultation draft of the Framework being agreed by the Forum in July 2017. The consultation ran from the 2nd August to the 22nd September. Just under 100 responses were received with the vast majority being supportive of the idea of producing the Framework and collaborative working between authorities. The responses were from a wide range of interested parties including Town/Parish Councils, Residents, Community Groups, Local Authorities, Public Bodies, Developers, Businesses, and Agents.
- 2.3 The Built Heritage and Planning Policy Working Party and Cabinet considered the Consultation Draft in September 2017 and whilst indicating broad support for the framework resolved to request consideration of a number of amendments to include more flexibility in relation to the determination of individual district council housing targets (in particular not binding Councils to include additional dwellings beyond those required by objectively assessed requirements – the framework suggested adding a 10% additional buffer), and greater emphasis within the framework in relation to the rural economy and in particular the importance of tourism and market towns for local employment.
- 2.4 An extensive review of the comments received was undertaken following the close of the consultation. All comments received have been individually reviewed, answered and any changes made to the Framework as a result have been logged. The comments made, responses to them and changes resulting from them are available to inspect on the Forum's website [<https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/>].
- 2.5 In addition to changes arising from the consultation response significant changes have also been made to the emerging Framework as a result of other matters. Most notably in the light of the government consultation 'Planning for the right homes in the right places', the New Anglia LEP Economic Strategy and Norfolk County Council's Infrastructure Delivery Plan all of which were published following drafting of the consultation document.

2.6 Key changes made to the emerging Framework following the close of consultation include:

- The water section includes two new agreements around water use, firstly committing all authorities in the County to adopt enhanced water efficiency standards in housing construction which go beyond the minimum standard required under the national building regulations, and secondly committing the authorities and the water companies to more formal/co-operative working practices particularly in relation to larger scale developments (new **Agreements 17 -18** refer).
- A new agreement has been added to the conclusion section highlighting the on-going support for joint working and the need to keep the Framework under review (new **Agreement 23**);
- A recognition of the desirability of having a transport agreement in future versions of the Framework;
- Change to the housing section of the document to refer to the implications of the government's proposed standard methodology for calculating objectively assessed need for housing and to change commitments to deliver a buffer above the need identified. It should be noted that the housing agreements in the framework only apply insofar as they relate to the local authorities own assessment of housing need and will need to be reconsidered if a new methodology is imposed by government; and
- Retitling of the document so it is referred to as the *Norfolk Strategic Planning Framework* and is described as an emerging *Statement of Common Ground* to reflect an anticipated government requirement in the forthcoming review of the National Planning Policy Framework (now not expected until at least Sept)
- Greater inclusion of tourism and rural economy issues (although North Norfolk officers consider these could be strengthened further in later versions).

2.7 The Member Forum met on 14th December and agreed to recommend the amended version of the Framework (attached as **Appendix 1**) to constituent Councils for their final endorsement.

3. The Norfolk Strategic Planning Framework (as revised following consultation)

3.1 The Framework sets out a number of agreements between the signatories. These are intended to ensure that the planning authorities continue to work closely together where it is desirable to do so but not to be so prescriptive that they would limit the local production of development plan documents. In summary the agreements are:

Agreements 1-3 – That the Norfolk planning authorities will plan to a common plan period extending to at least 2036 and in producing Local Plans they will seek to contribute towards the shared vision and objectives as outlined in the Framework.

Agreement 4 - That the Norfolk Authorities agree to prepare and maintain a consistent evidence base in relation to housing needs in three separate housing

market areas. This will include the joint commissioning of Strategic Housing Market Assessments when updates are required.

Agreements 5, 6 and 7 – That the Broads Authority and all other planning authorities outside of the greater Norwich Authorities (Norwich City, South Norfolk, and Broadland) will continue to prepare separate local plans unless the evidence suggests that joint Local Plan production is justified. The Greater Norwich Local Plan will be produced by the other three authorities.

Agreement 8 – That the focus for economic investment in the county will be on what are called the 'Tier One' Employment sites.

Agreement 9- That Local Plans will be prepared having regard to various cross boundary infrastructure issues.

Agreements 10 -16 – That each local plan will aim to address all housing needs (OAN); that housing need in the Broads will be addressed by the adjacent authorities if the Broads Plan does not meet need; that Norwich, South Norfolk and Broadland will address the housing requirement arising from the City Deal exclusively within their areas (this results in the setting of higher housing targets, dealt with via a buffer, to ensure that the aspirational jobs growth targets included in the City Deal are matched with sufficient homes to accommodate workers); each authority will quantify and plan for the delivery of specialist types of accommodation for gypsies, students and the elderly together with the identified need for affordable homes; that housing capacity will be assessed using a common methodology; and finally further measures will be taken to improve delivery rates of new housing development.

Agreements 17-18 – That the Authorities will seek to pursue high water efficiency standards and liaise closely with the water companies.

Agreement 19 – To produce guidance to help the roll out of 5G telecommunications infrastructure.

Agreement 20 – That the Authorities endorse the Planning for Health Protocol which establishes processes for more joined up working between health and planning when preparing plans and determining planning applications.

Agreement 21 – That the Authorities will work closely with the Council to ensure a supply and funding of school places.

Agreement 22 –That the planning authorities will work together to produce a County wide Green Infrastructure (GI) strategy.

Agreement 23 –That the planning authorities and other signatories to the Framework will continue to support and resource joint planning activity.

4. Conclusions.

- 4.1 In practice it should be noted that following consideration by the joint member forum there is no opportunity for the Working Party/Cabinet to propose further amendment to the Framework at this stage. The decision to be made now is whether to endorse it or not.

4.2 Whilst in a number of sections the Framework may not be fully developed, and in places the framework itself points to the desirability of further work, including in response to the imminent publication of revised national planning advice, it nevertheless provides a sound basis for the subsequent preparation of Local Plans and clearly demonstrates an on-going and effective commitment to joint working. Should Members agree to endorse the Framework in accordance with the recommendation it is suggested that North Norfolk takes the opportunity to highlight those areas where further joint working is considered desirable. This should include;

- More emphasis throughout the document on the rural parts of the county including the unique natural environment, key sectors of the rural economy, and greater acknowledgement of issues facing rural areas.
- Consideration of further joint working in relation to the management of visitor pressures at wildlife sites including the joint production of a Recreational disturbance Avoidance and Mitigation Strategy¹.
- Completion of further work on Green Infrastructure, Housing Delivery, Transport, and Broadband provision as identified in the document.
- On-going review and updating in response to national government legislation and any other significant new considerations.
- On-going production and maintenance of a joint evidence base to support the preparation of Local Plans.

4.3 It should also be noted that following the housing white paper and the consultation on planning for the right homes in the right places this is an area where government policy is moving quickly and it is expected that the Framework will need to be reviewed relatively quickly over the next year.

5. Recommendations

- 1. That the Working Party recommend to Cabinet that the '*Norfolk Strategic Planning Framework and Statement of Common Ground* and the agreements contained therein are endorsed by North Norfolk District Council.**
- 2. That the Council supports and welcomes the commitment to continued co-operative working and periodic review of the framework and in particular would support further work on those areas identified in paragraph 4.2 of this report.**

6. Legal Implications and Risks

- 6.1 It is a legal requirement to co-operate with neighbouring authorities in relation to strategically important cross boundary land use issues when preparing a Local Plan. Failure to meet this requirement would render a Local Plan unsound.

¹ A specific strategy widely referred to as RAMS which seeks to manage the potential impacts of large numbers of visitors to sites of European importance for wildlife.

7. Financial Implications and Risks

7.1 The Council currently makes an annual contribution of £10,000 towards the work of the forum to fund project management and the procurement of jointly prepared evidence. Joint commissioning of evidence produces substantial savings for individual authorities. In addition the work of the forum is supported by the planning policy team which has chaired the Housing task group and project managed the production of joint evidence on behalf of the partners.

Appendix 1 - Norfolk Strategic Planning Framework – version18 for endorsement.

Norfolk Strategic Planning Framework

Shared Spatial Objectives for a Growing County and Emerging Statement of Common Ground

December 2017



Acknowledgements

The authors would like to thank the following organisations for their support in the production of this document:

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- Waveney District Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Anglian Water
- New Anglia Local Enterprise Partnership
- Greater Cambridge Greater Peterborough Local Enterprise Partnership
- Great Yarmouth & Waveney CCG
- North Norfolk CCG
- Norwich CCG
- South Norfolk CCG
- West Norfolk CCG

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Section 1 – Introduction

1.1 Purpose of this Document

Norfolk's Local Planning Authorities (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 they, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of this Norfolk Strategic Planning Framework (previously called the Norfolk Strategic Framework and referred to in this document as the NSF).

The aim of producing the framework is to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate and consistency with the National Planning Policy Framework (while recognising the latter is due to be revised shortly);
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the Strategic Economic Plan); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The project has been underway since October 2015. Four working groups have been established to pull together a shared evidence base on housing, employment, infrastructure and delivery issues. The working groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England, Anglian Water, UK Power Networks, Homes and Communities Agency and the New Anglia Local Enterprise Partnership. Our thanks is extended to all those who have contributed to this work which has informed this framework.

For further information on the work of the Norfolk Strategic Planning Member Forum and about the process for preparing this strategy please see the Forum's website:

www.norfolk.gov.uk/nsf

This document is intended to be strategic in nature. It provides only an overview of background information and shared research. A wealth of information has been produced by the working groups; however a decision has been made to keep this document concise and to concentrate on the matters where there is a clear need for agreement between the Local Authorities. We acknowledge that not all factors have been considered, but where appropriate, relevant additional information has been highlighted. Mitigation of certain issues does not diminish their importance or value.

Details of the lead contact in each local Council on strategic planning matters are included in Appendix 1.

1.2 Changes to the document since consultation

A draft of this document was published for extensive public consultation over the summer of 2017. The consultation closed on 22nd September and a significant number of representations were received during the period. These representations have all been analysed and a considerable number of changes to this document have been made in response. Details of the representations made and responses to them can be seen at:

<https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/>

Shortly before the consultation on the NSF closed the government published consultation proposals titled "Planning for the right homes in the right places"¹. This document potentially has some significant implications for the NSF which have been reflected in this version of the document. In particular the government consultation proposed:

- a) a detailed methodology of a proposed standard approach to assessing housing need across local authority areas which had been previously proposed in the housing white paper ² as a measure to make the assessment of local housing need simpler, quicker and more transparent and therefore speed the production of local plans; and
- b) to introduce a requirement in the revised National Planning Policy Framework³ that all local planning authorities should produce a statement of common ground setting out cross boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls.

Both these proposals have the potential to significantly impact upon the NSF as the draft document already addressed issues of housing need and also did much of what the government are proposing to introduce by introducing the requirement for producing a statement of common ground. In the consultation document the government stressed that "The statement of common ground is not intended to replicate any stage of the plan-making process, nor should it be an additional burden on local planning authorities. Critically, we do not want this proposal to disrupt existing joint working arrangements where these are effective."⁴

Taking this steer from government the authorities are of the view that the NSF should effectively become the statement of Common Ground for Norfolk and a number of amendments have been made to the NSF so it is clear that this is the intention and to comply with the detail of what was proposed by government in the consultation document. Clearly as the government proposals have only been published for consultation at this stage it will be necessary to keep this decision under review and change the NSF further during 2018 if this is deemed necessary in order to comply with the requirements of the revised national Planning Policy Framework when it is finalised.

¹See <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

² <https://www.gov.uk/government/collections/housing-white-paper>

³ Due to be produced by Spring 2018

⁴ See para 65 of the consultation document

1.3 Timescale for and coverage of the Document

This document relates to the whole of Norfolk and all Norfolk authorities which include:

Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council and Norfolk County Council.

All Norfolk Local Planning Authorities have agreed that in their next generation of Local Plans to plan to a common end date of at least 2036. This is reflected in the evidence base for this framework insofar as it seeks to provide statistical information looking ahead to this period. This is also the date by when objectives are to be achieved. However, in parts, notably the vision, it is necessary for the document to take a longer term view.

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

Section 2 – Vision and Objectives

2.1 Introduction

Norfolk is a diverse County. It covers a land area of 5,370 sq. km (2,074 sq. miles) and has a population of 892,900⁵. It is a largely rural county with a relatively low population density, although over half of the population lives in the built up areas of Norwich, Great Yarmouth and King’s Lynn and a number of market towns⁶. These built up areas have a very considerable stock of historic assets and can offer a very attractive quality of life to residents.

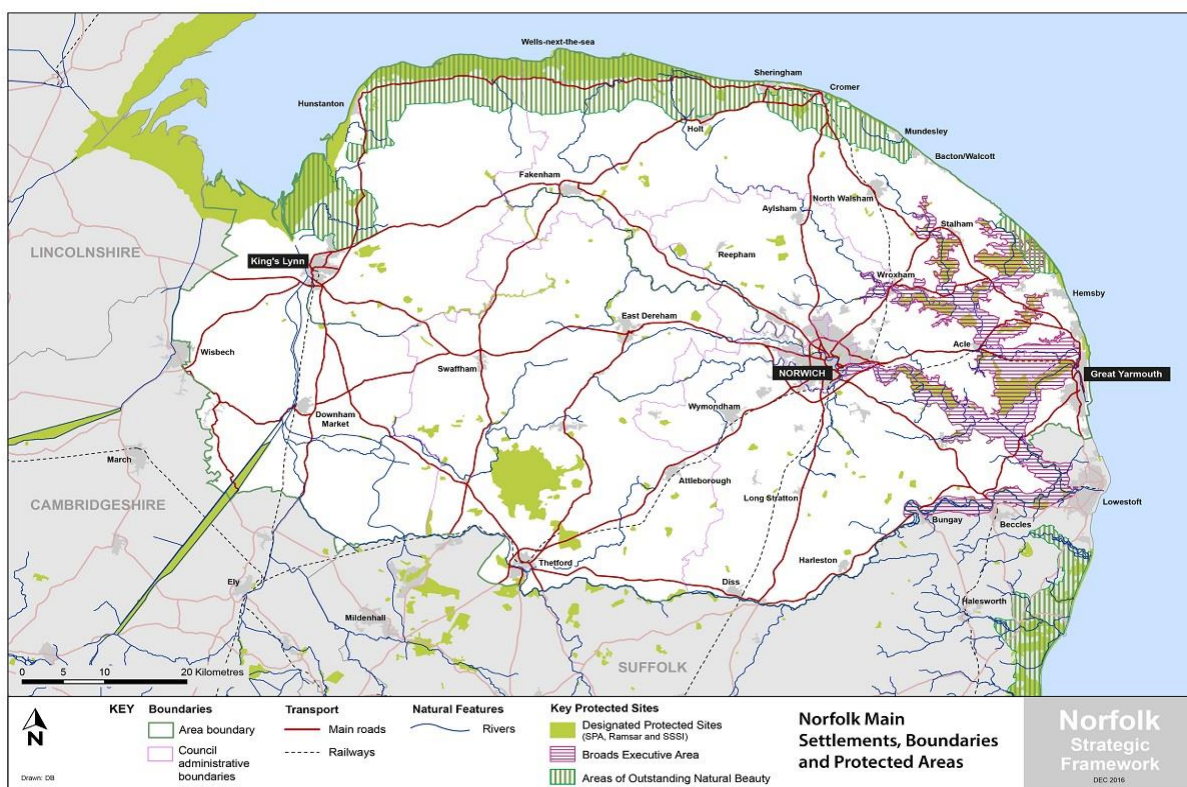


Figure 1: Map of Norfolk’s main settlement, Authority boundaries, major transport connections and protected areas. 2017

Norfolk borders Suffolk to the south, Cambridgeshire to the southwest, and Lincolnshire to the west, and has a long coastal boundary stretching from The Wash to the south of Great Yarmouth. It contains many environments which are highly valued for their landscape and for their biodiversity and/or geodiversity interests. In particular, the Norfolk Coast Area of Outstanding Natural Beauty, the Brecks and the Broads, which is a unique network of protected rivers and lakes that extends partly into Suffolk and has the equivalent status to a National Park.

⁵ Mid year 2016 ONS estimate see Norfolk Insight web page <http://www.norfolkinsight.org.uk/population>

⁶ The 21 largest others centres are Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Harleston, Holt, Hunstanton, Loddon, Long Stratton, North Walsham, Sheringham, Stalham, Swaffham, Thetford, Wroxham/Hoveton, Wymondham, Watton, Wells-Next-The-Sea

Norfolk's economy is also diverse. It is home to a number of world class industries such as on the Norwich Research Park and the offshore energy sector in Great Yarmouth. Employment levels are growing; there is a highly skilled and versatile population with good graduate retention rates and improving links to the thriving markets of Cambridge, London and the wider South East. However, it is not without challenges, gross value added per job in the area remains below the UK average⁷, there are high levels of deprivation especially in urban areas and skill levels in the workforce are relatively low. The Economic Strategy (which was produced by the New Anglia Local Enterprise Partnership in 2017) identifies a number of interventions designed to significantly uplift economic performance in Norfolk. Additionally, the King's Lynn and West Norfolk Council area is also covered by the Greater Cambridge Greater Peterborough (GCGP) Local Economic Partnership. Details of the GCGP Strategic Economic Plan can be seen online⁸. The document is under review. The new Cambridgeshire Combined Authority is also reviewing economic prospects in their area.

Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England. For many years Norwich was the largest city in England not connected to the motorway network by a dual carriageway. Cross county trips tended to be slow and unreliable and rail journey times from London were comparable to places in the north of England such as York and Warrington. However, the dualling of the A11 improved travel time and connectivity considerably, and recent announcements on both the A47 and the Greater Anglia rail franchise have the potential to improve this further. Norwich Airport, the busiest airport in East Anglia, offers regular flights to various destinations in the UK and Europe. Many of the key road and rail links connecting Norfolk to the rest of the UK are still in need of improvement as are many of the links within the County. The need to enhance capacity of infrastructure networks can add considerable costs and increase delays to development.

Patchy mobile coverage is a continuing frustration to residents and businesses. However, the picture regarding superfast broadband coverage is rapidly improving; nearly 88% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁹, and through the extension to the better broadband for Norfolk programme it is aimed to make high-speed broadband available to more than 95 per cent of Norfolk's premises by spring 2020.

Through working together and with government, businesses and residents Norfolk's Local Authorities hope to successfully address the challenges faced and maximise the potential of the County. As a basis for guiding this shared endeavour, the following shared vision and objectives have been agreed for consultation by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum¹⁰.

⁷ See NEW Anglia Lep <http://www.newanglia.co.uk/wp-content/uploads/2014/03/New-Anglia-Strategic-Economic-Plan-V2.pdf>

⁸ see <http://www.gcgp.co.uk/local-growth-strategy/>

⁹ See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

¹⁰ See papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf

2.2 Proposed Spatial Vision

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

2.3 Proposed Shared Objectives

Agreement 3 - By 2036, through co-operation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region’s business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, the Greater Cambridge Greater Peterborough Enterprise Partnership Economic Strategy and this framework;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk’s main settlements and across county boundaries to strengthen inward investment; and
- strengthening Norfolk’s connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel away from car use towards public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategies of New Anglia & GCGP LEPS;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life for all the population of Norfolk by:

- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land;
- where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

Section 3 – Understanding the County

3.1 Administrative Boundaries

Within Norfolk there are seven separate District Council areas¹¹ (as shown in Fig.2), each of which is a Local Planning authority. Overlying parts of five of these areas (and also part of Waveney District in Suffolk) is the Broads Authority which is the Local Planning Authority for its area rather than the District Councils. The Broads Authority Executive Area (in which the Broads Authority are the planning authority) overlays these administrative areas and is illustrated in Figure 1.

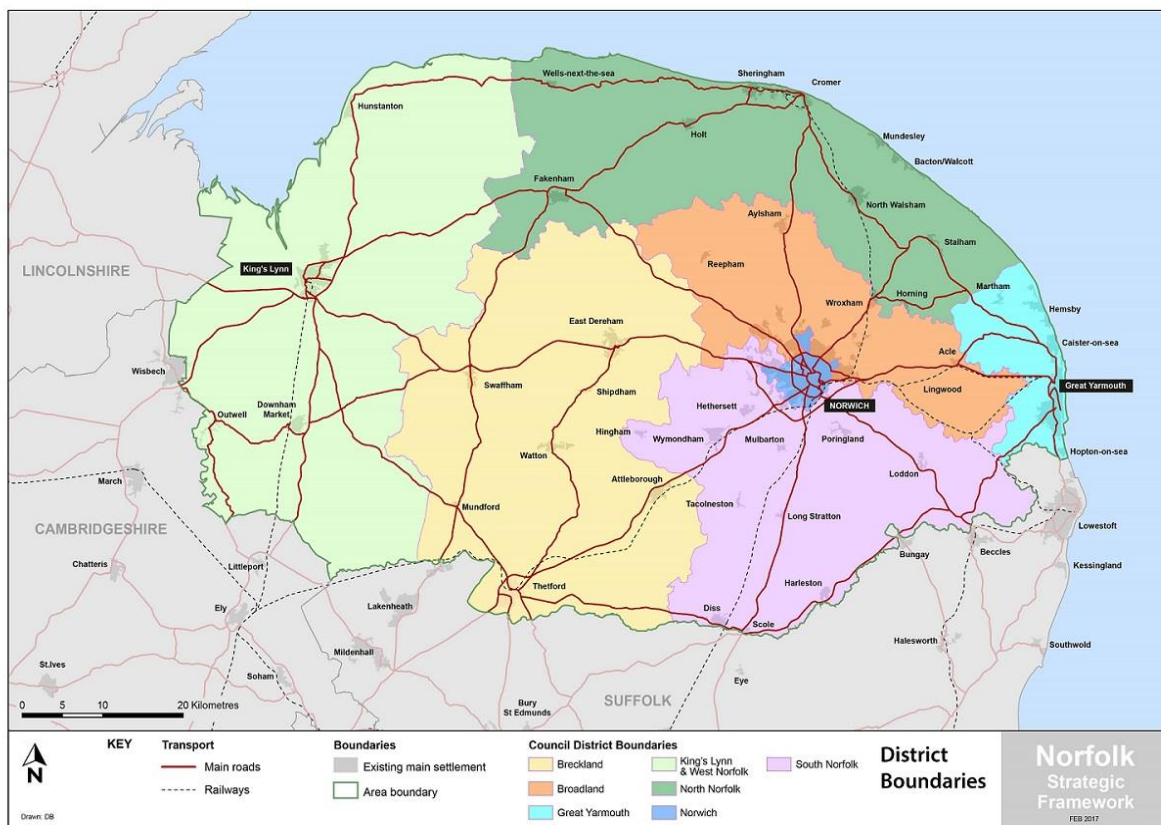


Figure 2: Map of Norfolk District boundaries and the major transport connections. 2017

In addition to the eight Local Planning Authorities the County Council are also a Local Planning Authority responsible for minerals and waste planning as well as certain operational development related to their functions (most notably for educational development). As County wide plans are already in place for minerals and waste¹² this framework does not address minerals and waste matters further although further iterations of these documents will doubtless need to reflect our

¹¹ Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.

¹² <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/adopted-policy-documents>

shared ambitions for growth. As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions.

Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.

The economic geography of Norfolk is complex as it reflects a multicentric area and boundaries tend to be fuzzy. Overall the County has a relatively high level of self-containment as the vast majority of the resident workforce stay in Norfolk for work, although there are some strong functional cross county boundary linkages¹³.

Within the County the three larger urban areas of Norwich, King's Lynn and Great Yarmouth have a considerable influence providing jobs, retail, health care and a broad range of services and facilities as well as homes for a significant proportion of the county's population. These three centres are located in the east, west and centre of the County and have relatively limited functional connection with one another, notwithstanding the A47 linking all three.

3.2 Housing Markets

Housing Market Areas (HMAs) are defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In defining them, regard is given particularly to: house prices and rates of change in house prices; household migration and search patterns; and contextual data (for example travel to work area boundaries, retail and school catchment areas). They tend to represent "*...the geographical area in which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay*"¹⁴. All areas need to be identified as being within a housing market although housing market areas can overlap. Norfolk HMAs can be seen in Figure 3.

The Norfolk Districts and the Broads Authority have produced up to date Strategic Housing Market Assessments (SHMAs) which cover the entire County¹⁵. Within the Central Norfolk SHMA area

¹³ The linkages between Great Yarmouth and Lowestoft; the settlements in the Waveney Valley; and between King's Lynn and the Fens and Cambridge being particularly important.

¹⁴ Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

¹⁵ See https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf
https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf

(comprising of Broadland District Council, Norwich City Council and South Norfolk Council) a case can also be made for the identification of a core area based around Norwich and its immediate environs including parts of both South Norfolk and Broadland District Councils. Outputs from the Central Norfolk SHMA include separate conclusions in relation to this core area.

The boundaries of Housing Market Areas will rarely correspond with the administrative boundaries of Local Authorities (Fig.3). In Norfolk there are three distinct HMAs centred on Norwich, King’s Lynn, Yarmouth and their surrounding hinterlands. However there are some areas of the County which are distant from any of these centres; functional links are less apparent, and the case for inclusion within one HMA rather than another is less compelling. To ensure comprehensive coverage the Norfolk Authorities have agreed that the boundaries of the Housing Market Areas should be co-terminus and because housing targets will be set for each Planning Authority area the boundaries of HMAs should be ‘snapped to’ Authority boundaries.

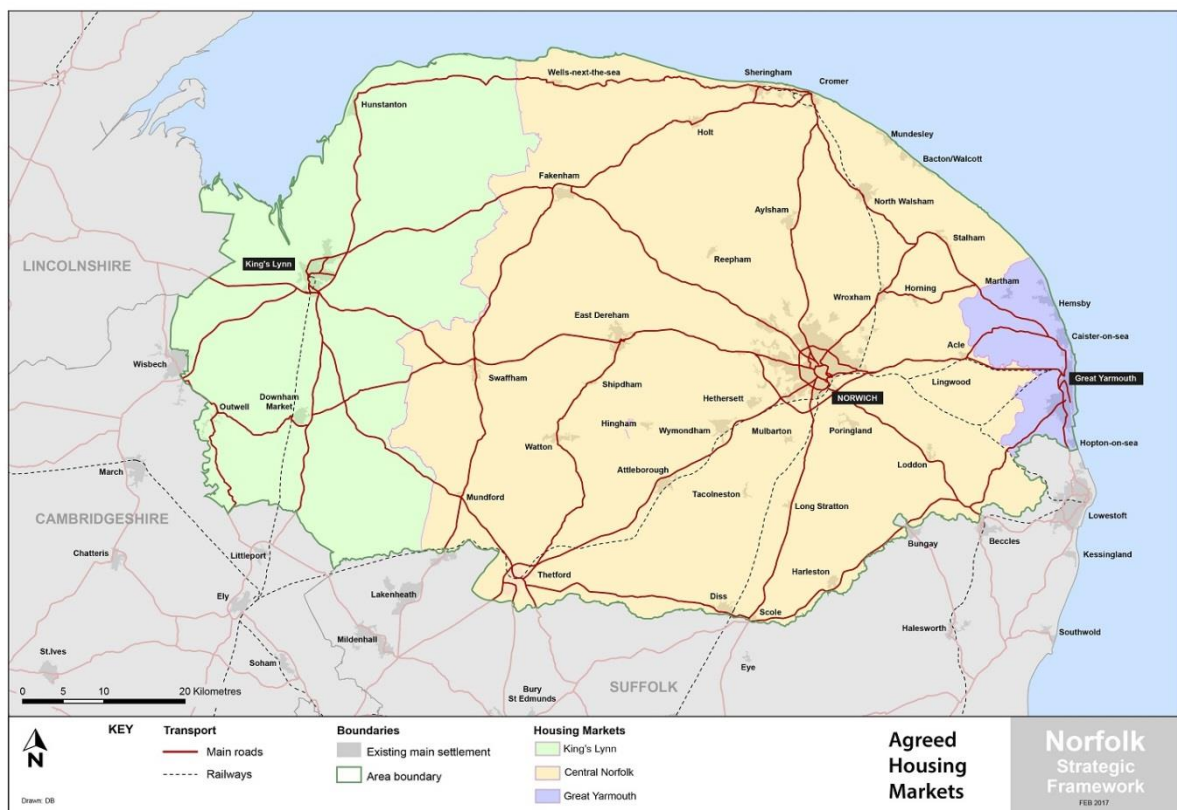


Figure 3: Map of Norfolk agreed housing markets and major transport connections. 2017

Agreement 4 –To produce and maintain Strategic Housing Market Assessments covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

<https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241>

The housing needs of the relevant parts of the Broads Authority Area are included within the SHMAs for Central Norfolk, Great Yarmouth and Waveney. The level of need within the Broads Authority area is specified within the Central Norfolk SHMA¹⁶.

By virtue of the methodological requirements of the definition HMAs, the Central Norfolk Housing Market is very large and includes settlements some considerable distance apart which have little or no functional connection. In response to this the Central Norfolk Strategic Housing Market Assessment¹⁷ defines a core housing market area identifying the settlements with the strongest connections to the Norwich Urban Area. This supports the decision to prepare separate Local Plans for North Norfolk and Breckland District Councils (see below).

The above agreement was drafted in advance of the publication of the “Planning for the right homes in the right places”. Clearly, with the possibility of a new standard methodology to assess objectively assessed housing need whether there will be a need to produce Strategic Housing Market Assessments in future is now open to question. However, it is clear that government still expects local planning authorities to plan for the right mix of home types and tenures to reflect local needs and the evidence base for such planning is only currently available from the SHMAs and is not available from the new proposed standard methodology. Therefore it has been concluded that until revised guidance from government is available on these matters it is best to retain agreement 4 within the NSF.

3.3 Strategic Functional Economic Market Areas

Government guidance recognises that since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area. However in recognising these areas it is possible to define them by taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- catchment areas of facilities providing cultural and social well-being; and
- transport networks.

Boundaries of Travel to Work Areas (TTWAs) are illustrated below in Figure 4. Information on retail matters are captured within the existing evidence base supporting Local Plans¹⁸. Both these sources suggest that whilst Norwich is a major Regional Centre and draws trade from an extensive catchment across Norfolk and the wider region, both King’s Lynn and Great Yarmouth retain a

¹⁶ See pages 132-134 of the Central Norfolk SHMA
https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf

¹⁷ See pages 35-36 of the Central Norfolk SHMA
https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf

¹⁸ See in particular www.greaternorwichgrowth.org.uk/dmsdocument/816

sufficient degree of self-containment to be considered in different functional economic market areas for most purposes.

It should also be noted that there are some very strong and significant cross boundary functional economic relationships. Great Yarmouth has particularly strong links with Lowestoft to the South. Within the Waveney Valley there are strong relationships between settlements on both sides of the County boundary. In the West of the County, King's Lynn in particular has functional economic linkages to the Lincolnshire and Cambridgeshire Fens. Settlements such as King's Lynn, Downham Market and Thetford also benefit to some extent by good access to the Cambridge economy.

The position within the Central Norfolk area is again more complicated as for certain economic functions (such as higher order retail and cultural activities) the catchment area extends over the whole of Central Norfolk areas; there are far weaker connections in other areas of economic activity. In outer parts of the Central Norfolk area there is little functional connection for convenience shopping and the proportion of working residents who work in the Norwich urban area is very low¹⁹. Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

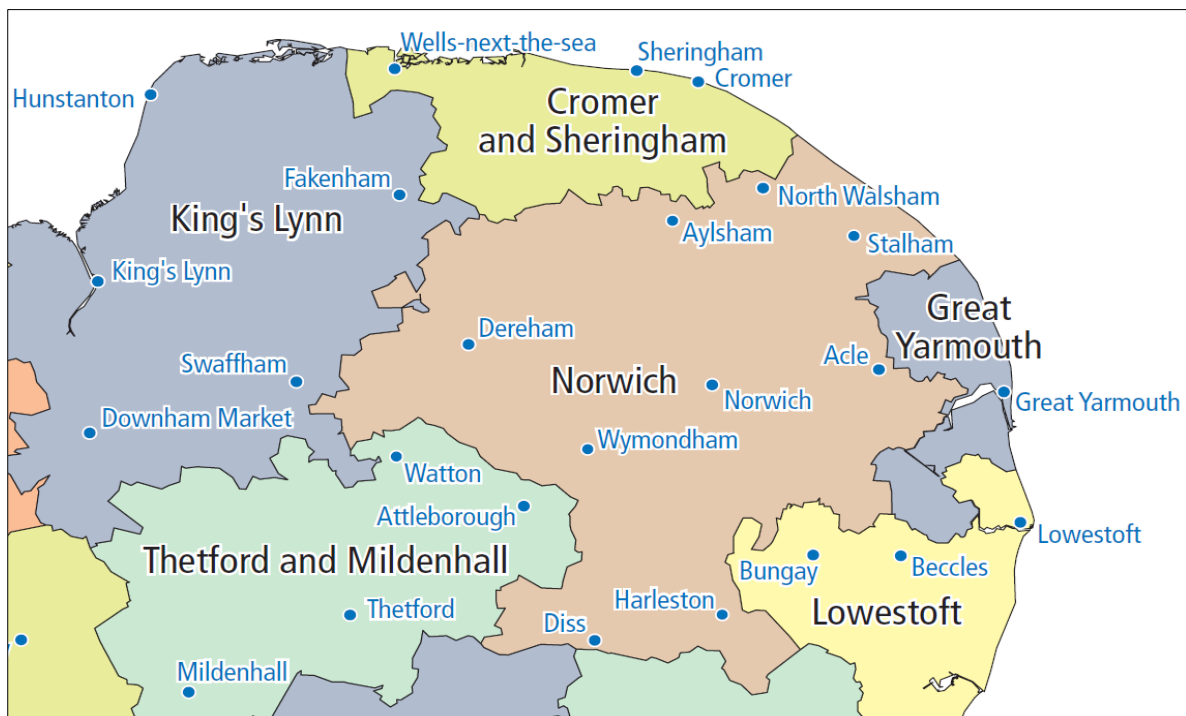


Figure 4: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

The information available, including particularly the TTWAs and the higher retail analysis, suggests that the boundaries of strategic functional market areas are likely to be similar to the Housing Market Areas described above. Albeit, for many purposes significant sub-areas within these

¹⁹ The Central Norfolk SHMA identified the following settlements within the area of the 5 Central Norfolk Districts as having less than 10% of their resident workforce working in Norwich: Diss, Harleston, Sheringham, Swaffham, Thetford, Watton and Wells.

strategic areas will exist for a number of economic functions, especially within the Central Norfolk area.

3.4 Implications of Changing Infrastructure on Market Areas

Norfolk has benefitted from a number of significant improvements to its transport infrastructure. It is arguable that these, and others expected to be built over the next few years will have some effect on the functionality of the housing and economic markets. For example the dualling of the A11 (Fiveways to Thetford) was completed and opened in December 2014, significantly improving the road connectivity between much of the County, Cambridge, the wider South East and the Midlands. The A47/A143 link road, which opened in December 2015, now better connects Great Yarmouth's Enterprise Zone at Beacon Park to further growth areas. Work has also commenced on the Norwich Northern Distributor Road, which is expected to be completed before the end of 2018, and is a key part of the Norwich Area Transportation Strategy which also includes considerable investment in a range of other improvements across Norwich²⁰.

The Highways (England) Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the government's trunk road programme from 2015 to 2020:

- A47 Vauxhall and Gapton Roundabouts, Great Yarmouth
- A47 Blofield to Burlingham Dualling
- A47 Easton to Tuddenham Dualling
- A47/A11 Thickthorn junction

Additionally further improvement to the strategic road network of the County will be delivered by the Long Stratton bypass which is expected to be underway by 2020. The A17 is an important part of the road network, serving longer-distance trips, and is expected to be included as part of the Major Road Network, which we understand government will consult on before the end of the year.

In summer 2016 the Department for Transport confirmed Abelio as the operator of the new East Anglian rail franchise, which commenced in October 2016. The new nine year franchise will deliver a variety of improvements including the following that are of particular significance for Norfolk:

- Replacement of the entire fleet of trains which will all be in service by the end of 2020;
- More services and faster journeys across the network, including two 'Norwich in 90' trains each way per day;
- Norwich to Cambridge services extended to Stansted Airport every hour;
- Faster services between Cambridge and London;
- Work with Network Rail to implement specific schemes to drive up performance and reliability throughout the franchise;
- Increase in seats into London in the morning peak period, and an increase of more than 1,000 services per week on the franchise network; and
- Various other improvements including improvements to WiFi, stations and ticketing systems.

²⁰ See www.greaternorwichgrowth.org.uk/dmsdocument/554 for further information

A priority is the improvement of the Cambridge Norwich services including half hourly frequency.

Whilst the recently delivered and announced infrastructure enhancements are welcomed and cumulatively will assist the County in reaching its economic potential it is not considered likely they will result in any significant change to the functional geography of the County in the immediate future with regard to either housing or economic markets. East/West communications across the County will remain relatively slow and lack reliability, therefore it is likely that both King's Lynn and Great Yarmouth will retain similar levels of self-containment in housing and economic matters as present. The functional geography of the County will remain broadly as it is at least for the period of the preparation of the next round of Local Plans.

In the "Planning for the right homes in the right places²¹" consultation document the government proposes "that every local planning authority produce a statement of common ground over the housing market area or other agreed geographical area where justified and appropriate".

In the light of the objectives of the government in introducing the requirement for statements of common ground, and the above analysis of our functional economic geography it is the view of the Norfolk Local Planning Authorities that there is a strong case to produce a single statement of common ground across Norfolk rather than seeking to produce three separate ones based on one large and two small Housing Market Areas. The reasons for this are:

- The recognised desire of the government not to disrupt existing joint working arrangements where these are effective;
- The high overall rate of self-containment of the Norfolk economy;
- The somewhat weak functional relationship between the outer areas of the Central Norfolk Housing Market Area and its core and the similarity of the strategic issues faced by these outer areas with the adjoining coastal and rural areas of Kings Lynn and West Norfolk and Great Yarmouth Boroughs; and
- The way in which the Broads Authority area overlaps both the Great Yarmouth and Central Norfolk Housing Market Areas and five of the District planning authority areas which are signatories to this Framework.

Furthermore the shared understanding of economic geography has led to a number of agreements being reached about appropriate Local Planning areas for Norfolk.

The relative self-containment of both King's Lynn and Great Yarmouth suggests that in practical terms there may be problems in seeking to meet growth pressures evident in King's Lynn and Great Yarmouth within the central Norfolk area and vice versa. In the light of this the following agreement has been reached.

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

²¹ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

With regard to Central Norfolk, the evidence does suggest that there may be some possibility for some of the growth pressures evident within the five Districts of Central Norfolk to be met within the different administrative areas of Central Norfolk. These five District authorities (Breckland, Broadland, North Norfolk, Norwich City and South Norfolk, along with the Broads Authority that partly overlaps 4 of their administrative areas) already co-operate closely, have a shared SHMA and are working on other joint studies. However, as noted above the Central Norfolk Housing Market Area is broad and contains places that have little relationship within one another and only a comparatively weak relationship with Norwich at the centre of the area. In the light of this the Local Authorities have reached agreement that whilst it will be necessary to closely co-operate on strategic planning matters and shared evidence it is only appropriate to seek to plan jointly over the area closer to Norwich with much stronger functional connectivity. The possible advantages of producing a single Local Plan covering all of Central Norfolk are considered to be outweighed by the delays this would cause to plan preparation and the difficulty of getting meaningful engagement over such a large area.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

The issue of whether it is appropriate to define any sub market areas or not will be a matter for those Plans. This approach does not preclude the possible redistribution of growth across the Central Norfolk area should this be supported by evidence and agreed by the relevant planning authorities.

Furthermore, the Broads Authority Area overlaps functional housing and travel to work areas of Central Norfolk, Great Yarmouth and Lowestoft. The area clearly has a unique environment and a very distinct set of planning challenges which suggest that joint Local Planning would not be the best approach.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

For further information on the current Local Plans in the County and the timetable for review please see the Norfolk Compendium²².

²² See <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use/norfolk-compendium-of-local-plans-2016.pdf>

Section 4 – Projections of growth

As a baseline for planning activity published projections for the County must be considered, including projections regarding population, households and employment. These are summarised below. However, it should be recognised that these are statistical projections and tend to be very heavily based on the extrapolation of past trends. In forward planning it is essential that other factors are given due weight. This is done in subsequent sections of this document and these projections are only produced for information.

4.1 Population Projections

The most recent set of national population projections were published by the Office for National Statistics (ONS) in May of 2016²³. Table 1 shows a steady growth in population levels projected at a 14% increase over the 22 year period from 2014-2036. All districts are projected to see a broadly similar level of growth of between 9% and 15% overall apart from South Norfolk that is projected to grow much more rapidly.

Table 1: Current and projected population numbers for Norfolk Districts. Source: ONS, 2016

District	2014 (000's)	2036 (000's)	Population growth 2014- 2036 (%)
Breckland	134	154	15
Broadland	126	140	11
Great Yarmouth	98	107	9
King's Lynn and West Norfolk	150	167	11
North Norfolk	103	116	13
Norwich	138	159	15
South Norfolk	129	160	24
Norfolk	878	1,002	14

It should be noted that these projections do not take into account existing planned growth such as existing commitments in the Greater Norwich Joint Core Strategy. This would suggest a somewhat different distribution of population growth between the Greater Norwich authorities.

The population projections also contain considerable information of the age profile of the population. This is potentially of considerable strategic significance for Norfolk which will have considerable implications for Local Authority services and will need to be considered in Local Plans. The projected age profiles are set out in the Table 2 and 3 below.

²³Available at

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

Table 2: Existing population numbers (000s) and % by age quantiles (2014) and projected population numbers and % by age quantiles (2036) of Norfolk Districts. *Source: ONS*

District	All people (000s)	2014			2036			
		000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s Aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	134	29.4 (21.9)	72.9 (54.4)	31.7 (23.7)	153.7	31.2 (20.3)	73.5 (47.8)	49 (31.9)
Broadland	126	26.1 (20.7)	68.8 (54.6)	31.2 (24.8)	140.1	27.2 (19.4)	67.8 (48.4)	45.2 (32.3)
Great Yarmouth	98.2	22.2 (22.6)	53.4 (54.4)	22.5 (22.9)	107	22.3 (20.8)	52.7 (49.3)	31.9 (29.8)
King's Lynn and West Norfolk	150	31.8 (21.2)	81 (54)	37.1 (24.7)	166.9	34 (20.4)	79.9 (47.9)	53.2 (31.9)
North Norfolk	102.9	18.6 (18.1)	52.1 (50.6)	32.1 (31.2)	115.8	19.5 (16.8)	50.8 (43.9)	45.6 (39.4)
Norwich	137.5	30.2 (22)	86.9 (63.2)	20.4 (14.8)	158.9	35.1 (22.1)	95.9 (60.4)	27.8 (17.5)
South Norfolk	129.2	29 (22.4)	69.7 (53.9)	30.4 (23.5)	159.6	35.4 (22.2)	77.2 (48.4)	46.8 (29.3)
Norfolk	877.7	187.4 (21.4)	484.9 (55.2)	205.2 (23.4)	1002	204.7 (20.4)	497.8 (49.7)	299.4 (29.9)

Table 3: Change in 000s between 2014 and 2036. Difference between 'All People' for each district between 2014 and 2036 in %. *Source: ONS*

District	All people (000s)	Difference between 2014 and 2036		
		000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	19.7	1.8 (-1.64)	0.6 (-6.6)	17.3 (8.2)
Broadland	14.1	1.1 (-1.3)	-1 (-6.2)	14 (7.5)
Great Yarmouth	8.8	0.1 (-1.8)	-0.7 (-5.1)	9.4 (6.9)
King's Lynn and West Norfolk	16.9	2.2 (-0.8)	-1.1 (-6.1)	16.1 (7.2)
North Norfolk	12.9	0.9 (-1.2)	-1.3 (-6.8)	13.5 (8.2)
Norwich	21.4	4.9 (0.1)	9 (-2.8)	7.4 (2.7)
South Norfolk	30.4	6.4 (-0.3)	7.5 (-5.6)	16.4 (5.8)
Norfolk	124.3	17.3 (-0.9)	12.9 (-5.6)	94.2 (6.5)

These tables show that whilst the overall population of the County is projected to grow steadily at a relatively modest rate, the change in the age profile is more significant with over three quarters of

the total increase between 2014 and 2036 being accounted for by growth in the over 65s²⁴. The number at the older end of the age spectrum projected to increase particularly strongly; the number of over 80s is projected to almost double. Between the ages of 20 and 64 population growth is projected to be very slow, with only a 2.7% growth rate over the 22 year period, whilst the numbers of 0-19 years olds are projected to grow by 9.2%.

These numbers do vary somewhat between individual districts (with Norwich being notably less affected by an ageing population) but the growth in the elderly population is projected to affect most parts of the County and will create significant issues given current models for funding social care and education provision. These issues are not considered further in the framework but the issues relating to housing are considered further in the housing section below.

The recent 2017 Health profile for England²⁵ suggests:

- Life expectancy continues to rise, albeit at a declining rate, but the number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions
- The life expectancy gap between men and women is closing which may later affect the size of older person households over time
- Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration
- There is growing evidence of the link between incidents of flooding and poor mental health

²⁴ Total growth in population age 65 plus is 95,000

²⁵ See <https://www.gov.uk/government/statistics/2017-health-profiles>

4.2 Household Projections

The most recent set of household projections were published by Department for Communities and Local Government (DCLG) in July 2016²⁶. These show that due to demographic changes households will increase at a marginally faster rate than population. Similar patterns of growth are shown as for population but again it should be noted that these projections do not take into account growth planned in existing Local Plans which may influence the scale and distribution of the growth in households.

Table 4: Past and present household numbers with future household projections. Source: ONS

District	1991 (000's)	2001 (000's)	2014 (000's)	2036 (000's)	Household growth 2014-2036 (%)
Breckland	44	51	56	68	21
Broadland	43	50	54	63	17
Great Yarmouth	36	39	43	50	16
King's Lynn and West Norfolk	53	58	64	74	16
North Norfolk	38	44	47	56	19
Norwich	54	55	62	74	19
South Norfolk	42	47	55	70	27
Norfolk	310	344	383	453	18

It should also be noted that much of the household growth projected between 2014 and 2036 can be accommodated by housing for which provision has already been made through planning permissions and/or allocations made in existing Local Plans.

4.3 Employment Projections

Across the East of England Local Authorities use the East of England Forecasting Model (EEFM) to better understand the development needs of their area. The model provides a set of baseline forecasts designed to facilitate the setting of consistent housing and jobs targets and can also provide a means of generating alternative scenarios. It is prepared by the independent forecasting house Cambridge Economics and further information about the model and details of runs published are available online²⁷.

Table 5 sets out the headline results for Norfolk Districts produced in the 2016 run of the model. As with any forecast model, these results need to be treated with a degree of caution. They are “policy neutral” and assume that policy context in the future remains broadly as it has in the past. They cannot reflect the impact of any recent or future interventions that may be made through infrastructure investment, Economic Strategies or Local Plans. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

²⁶ See <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

²⁷ See <http://cambridgeshireinsight.org.uk/EEFM>

Overall the model shows that without additional intervention total job levels in the Norfolk economy are projected to grow at relatively modest rates over the next 20 years with most of the growth projected taking place within Greater Norwich. If the aims of the City Deal are added to the model's forecasts, it projects that over 75% of all the net growth in Norfolk will take place in Greater Norwich.

Table 5: Current total employment with projected jobs levels and growth. Source: EEFM 2016 and Central Norfolk SHMA

Districts	Current total employment (000's)			Projected jobs levels 2036 (000's)	2014-2036 growth (000's)
	2012	2014	2016		
Breckland	52.4	56.1	55.3	56.7	0.6
Broadland	53.8	52.8	55.7	57.8	5.0
Great Yarmouth	43.7	44.0	45.1	49.7	5.7
King's Lynn and West Norfolk	65.4	67.4	68.4	72.8	5.4
North Norfolk	39.2	41.2	41.8	43.7	2.5
Norwich	93.0	92.9	99.4	110.9	18
South Norfolk	58.5	59.5	60.3	70.8	11.3
Greater Norwich*	205.3	205.2	215.4	251.3**	46.1
Norfolk	406.0	413.8	426.0	474.3**	60.5

*Broadland, Norwich & South Norfolk

**City Deal additional 11,800 jobs added but not broken down between GN Districts

Section 5 – The Economy

Strategic Economic Objectives

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, the Greater Cambridge Greater Peterborough Enterprise Partnership Economic Strategy and this framework;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment; and
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

5.1 Introduction

Compared to other areas in the UK, Norfolk has generally weathered the economic downturn since 2008 well. This is largely due to its diverse economy which is not reliant on any one sector. County employment levels and Gross Value Add (GVA) have returned to pre-downturn levels. The value of Norfolk's economy is £18.6 billion.²⁸

Overall Norfolk's economy is growing, although growth is stronger in some parts of the County than others. This growth is driven by certain sectors of the economy, mostly concentrated in specific geographic areas, where there are particular strengths and expertise, for example energy, advanced engineering, tech/digital, food and life sciences. Norfolk's overall employment rates have consistently remained above national levels over the past 10 years (currently by 2.8%) and unemployment rates are currently 2.1% below the national rate at 3.1% - the lowest rates in a ten year period. However, this disguises substantial variation, and the County includes some of the most

²⁸ New Anglia LEP, 2015

deprived communities in the Country which have not weathered the downturn so well. The potential impact of Brexit adds uncertainty to future projections.

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. These key sector/industrial clusters can be summarised as follows:

- Agriculture and Food Processing – Breckland, King’s Lynn & West Norfolk, North Norfolk, Greater Norwich
- Tech/digital Industries – Greater Norwich
- Offshore Energy – Great Yarmouth
- Engineering & manufacturing – King’s Lynn & West Norfolk, Breckland, Greater Norwich, Great Yarmouth
- Financial Services - Greater Norwich
- Health and Life Sciences – Greater Norwich
- Tourism – The Broads, The Brecks, Great Yarmouth, North Norfolk, King’s Lynn & West Norfolk, Greater Norwich

Notwithstanding these clusters and our economic strengths, the challenge going forward is the Norfolk economy’s high level of dependency on lower wage, lower-skill sectors such as food production, agriculture and tourism, and the related high concentrations of very deprived populations in some parts of the County and ‘hidden’ rural poverty elsewhere. This is reflected in productivity levels per head which are significantly below the national average. This, coupled with low levels of investment, relatively poor infrastructure and skills attainment, impacts on potential future economic growth.

While this Strategic Framework addresses development matters (broadly speaking, building and changes in the use of land), it is recognised that to be fully effective this needs to be complementary to other programmes and measures at the district, county, regional and national levels. In the light of the factors mentioned above, endeavours to promote ‘inclusive growth’ are especially relevant such as developing skills, community aspiration and capacity; recognising and nurturing the contributions of voluntary and community sectors; the quality of job opportunities, etc.

Many districts have their own economic development strategies, and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing strategy and such cooperation going forward.

The UK government published a green paper Building our Industrial Strategy in January 2017²⁹. The overarching aim and ambition of the Industrial Strategy is to provide a long term framework to build on our areas of competitive advantage, to close the gap between our best and worst performing areas, and make the UK one of the most competitive places in the world to start or grow a business. The strategy identified 10 key separate but linked pillars of the strategy and recognised the importance of place in shaping and delivering the Industrial Strategy.

²⁹ See <https://www.gov.uk/government/consultations/building-our-industrial-strategy>

The overarching strategy for Norfolk set in the context of the New Anglia LEP area is set out in the Economic Strategy which was published in 2017³⁰ (Please note the King’s Lynn and West Norfolk area is also covered by the by the Greater Cambridge Greater Peterborough Local Economic Partnership Strategic Economic Plan³¹). This set a number of ambitious targets regarding jobs numbers, new business start-ups, housing delivery, and productivity by 2036. Some of the key targets are summarised in Table 6:

Table 6: Summary of Key Economic Strategy targets (New Anglia Area)

Economic Strategy Headline	Target (to 2036)
Jobs	88,000 more jobs
Businesses	30,000 new businesses
Housing	140,000 new houses
GVA	£39 per Hour

It is expected that measures to assist in the delivery of these objectives will be brought forward as part of the Implementation of Delivery and Investment Plans in Spring 2018.

The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk. These include new multi-site Enterprise Zones led by the New Anglia LEP, the new Cambridge-Norwich Tech Corridor, innovation centres at King’s Lynn and Hethel, and energy related Enterprise Zones across Great Yarmouth and Waveney.

Supporting the growth of Norwich Research Park for example, and other key Enterprise Zone sites, will help to grow knowledge jobs in key sectors and enhance the commercialisation of research. A greater focus on supporting digital entrepreneurs will also help strengthen the growing cluster of tech/digital creative enterprises in and around Norwich’s city centre, and strengthening supply chains in the manufacturing, engineering and energy sectors will enhance business sustainability and employment growth.

The DCLG household forecast reproduced above in section 4.2, Table 2&3 suggests that there will be an annual growth in households of approx. 3,200 households per annum across Norfolk through to 2036. Yet the housing needs assessment set out in table 9 in section 6.3 below commits the Local Authorities to making provision for a least 4,000 new homes per annum over the same period (excluding additional housing for the City Deal). Although a minor element of this difference may be accounted for because of housing backlogs caused by historic under-delivery, the largest factor is the expectation of economic development that has been built into the needs assessments. The methodologies used to calculate housing needs effectively make some allowance for job and productivity growth in future being in excess of current levels. Therefore it is recognised that additional economic interventions will be needed in order to deliver the objectives identified within this framework.

³⁰ See <https://newanglia.co.uk/our-economic-strategy/>

³¹ see <http://www.gcgp.co.uk/local-growth-strategy/>

The development of this framework has concentrated on; identifying strategic sites, possible further interventions and cross boundary working that will need to be taken forward to deliver the shared objectives that have been agreed.

5.2 Strategic Employment Sites

Strategic employment sites have been agreed through joint activity on economic development and inward investment. They are all located in the growth locations identified in New Anglia LEP’s Strategic Economic Plan and are targeted at the SEP’s key sectors. Therefore it is crucial to facilitate a step change in our economy and the focus of promotional activity.

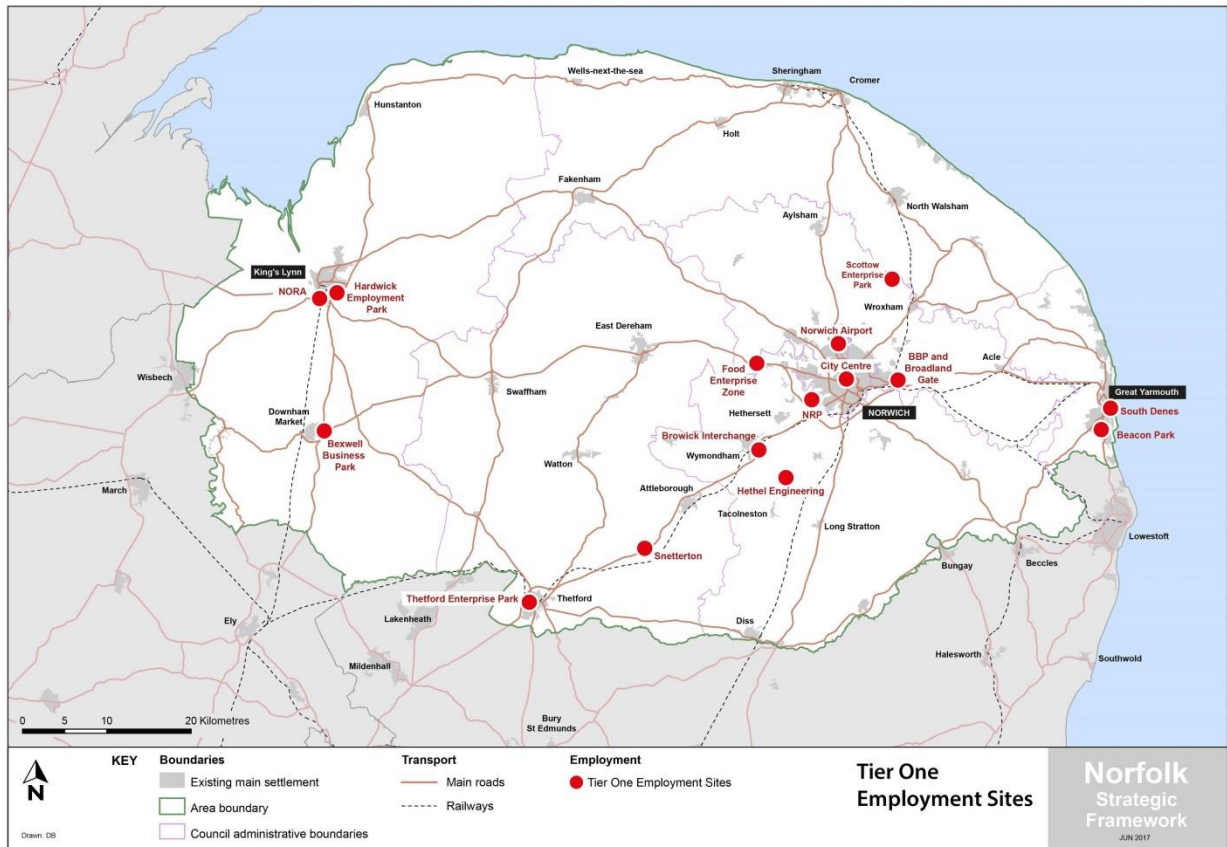


Figure 5: Norfolk’s Tier One Employment Sites. 2017

Together they form a package of sites that provides a comprehensive offer for inward investment and strategic growth, a number of which have Enterprise Zone status. The number and availability of these sites gives Norfolk an economic advantage in attracting certain types of inward investment. In addition, as a result of their scale and type, these sites have additional potential through existing and planned close cross-boundary working. By their nature some of these sites form part of wider functional economic areas which span district/county boundaries, increasing potential for joint collaboration to enhance economic growth.

Agreement 8 recognises that these Tier 1 sites should be protected from loss to alternative uses such as housing which is consistent with Paragraph 4.18 of the Housing White Paper which proposes that employment sites identified as “strategic” will not be subject to reduced protection from residential development. It is therefore proposed that the Tier 1 employment sites identified in Table 7 are formally recognised as “strategic” employment sites within Agreement 8.

Table 7: Tier one employment sites, sector, location and size. 2017

Site	Supports SEP Key Sector(s)	SEP Growth Location	Land available (approx.)
Bexwell (Downham Market)	ICT and Digital Creative	King's Lynn and Downham Market (A10)	29 ha
Broadland Business Park area - plots on existing BBP - BBP Laurel Farm - St Andrews northside, - Broadland Gate	Financial services ICT & Digital Creative	Greater Norwich	55ha
Browick Interchange (Wymondham)	Advanced Manufacturing & Engineering. ICT and Digital	Tech Corridor	22 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	19ha
Great Yarmouth Enterprise Zone and Energy Park sites: - Beacon Park (EZ) - South Denes (EZ & EP)	Energy	Great Yarmouth and Lowestoft	13.5ha 25ha
Hardwick extension (King's Lynn)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10)	27 ha
Hethel Engineering Centre and Technology Park	Advanced Manufacturing & Engineering	Greater Norwich Tech Corridor	20ha
Nar Ouse Business Park (King's Lynn) (part EZ)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10 corridor)	17 ha (EZ)
Norwich City Centre	ICT and Digital Creative Financial Services Tourism and Culture	Greater Norwich	Multiple Sites
Norwich Airport - Aeropark - Southern area (around Hurricane Way) - Airport business park	Advanced Manufacturing & Engineering	Greater Norwich	75ha+
Norwich Research Park (part Enterprise Zone) NRP North and South	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	45ha (EZ) 25ha)
Scottow Enterprise Park	Logistics Energy	Greater Norwich/ North Norfolk	26 ha
Snetterton	Advanced Manufacturing & Engineering	Tech corridor	68ha
Thetford Enterprise Park	Advanced Manufacturing & Engineering Food, Drink & Agriculture	Tech corridor	18ha

Agreement 8 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

This list will need to be kept under review in the light of emerging Economic Strategy priorities and the progress on Local Plans.

5.3 Key Cross-Boundary Economic Issues and Interventions

This section identifies the principal strategic economic matters and other matters which can only be fully addressed through development plans in (or across) more than one local planning authority area. It therefore does not include a wide range of matters which whilst they are recognised as very important, but which do not meet the specific definition of strategic development 'Duty to Cooperate' matters laid down by the Localism Act. These include the generality of

- rural economy (including agriculture);
- tourism and recreation;
- development of market towns;

Development associated and supporting these is addressed through individual local plans and informal joint working between local planning authorities, and these issues are addressed more widely through economic and other strategies. Neither is this section intended to include every economic issue that requires cross-boundary working, but just those of an extensive or special significance from a Norfolk wide perspective.

The role of Norwich

Norwich and its immediate hinterland is the prime economic generator in the County. Its influence, and the policy measures required to make the most of this extend well beyond both the City Council's boundaries and the existing urban area.

A large part of the county depends upon the vibrancy of the city for employment, services, higher order retail, culture and leisure. It also has an economic importance as a public transport hub. The vibrancy and focus of activity in the city centre also attracts significant numbers of visitors, and helps make the wider area an appealing place to live, work, invest and locate businesses.

The economy of this wide area of influence will benefit from ensuring that the city is accessible; the centre continues to thrive and is attractive to inward investment; and out of centre development complements the overall offer.

The Norwich Northern Distributor Road (NDR) will support the delivery of planned housing and jobs to the north and north-east of Norwich. It will improve strategic access to a wide area of Broadland and North Norfolk. Realising the full range of economic opportunities will benefit from cooperation. The Airport supports the economy of the area including the off shore energy sector.

Broadland, Norwich, and South Norfolk, with Norfolk and the Broads Authority, are working through the Greater Norwich Development Partnership (GNPD) on the planning of the area.

The Norwich Area Transportation Strategy (NATS) identifies the transport improvements needed over the next 15+ years. The NATS Implementation Plan (agreed 2010, updated 2013) sets out a range of transport measures with their intended phasing for delivery over the short to medium term. Both are due to be updated.

Cambridge to Norwich Technology Corridor

The corridor from Norwich to Cambridge, identified in Fig.6, includes a cluster of existing tech businesses and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line. These opportunities need to be supported and exploited to maximise economic benefits.

The corridor is identified as a key growth corridor in the New Anglia LEP's Strategic Economic Plan and the Greater Cambridge Greater Peterborough LEP are also part of the Cambridge Norwich Tech Corridor Initiative partnership. The Cambridge Norwich Tech Corridor initiative³² has been established to maximise the economic benefits of this high quality location for technology based businesses with its world class universities, research institutes and long established tech businesses. The partnership will capitalise on the talent pool, emerging sectors, low cost space, high quality environment, infrastructure networks and a fast growing economy to deliver innovation-led growth and investment.

In Norfolk the corridor extends through Norwich, South Norfolk and Breckland, and then into Suffolk and Cambridgeshire.

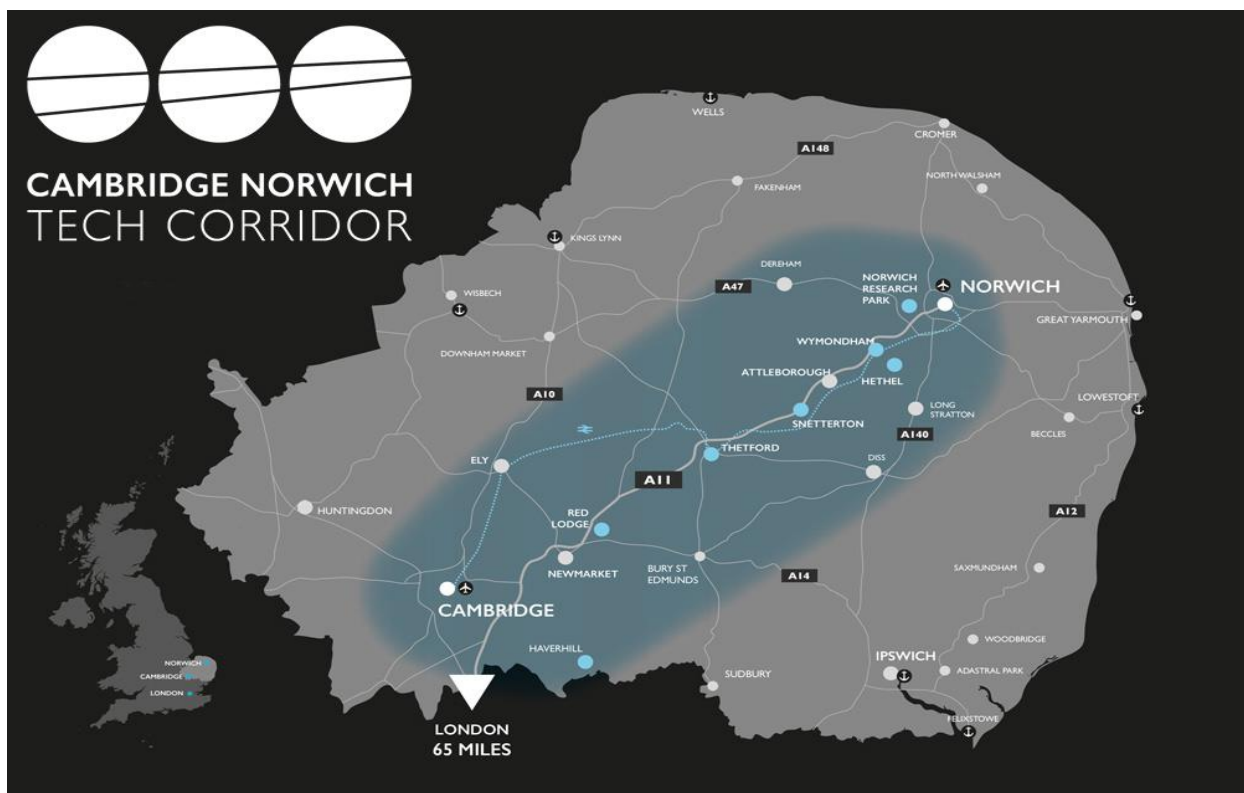


Figure 6: The Tech Corridor between Cambridge and Norwich, 2017

³² See <http://www.techcorridor.co.uk/> for further information

A47 Corridor

The A47 crosses the county and, directly or indirectly, affects all Norfolk's districts, parts of Suffolk and Cambridgeshire. The current limitations of the A47 act as a brake on economic growth, hindering investment, adding business and commuter costs, cause disproportionate accident and safety issues and contribute to the 'peripheral' image of Norfolk. Improvements to the road will unlock jobs, increase GVA and attract additional private investment all along its length.

The A47 Alliance comprises of representatives from all Local Authorities, the business community, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Alliance is working to make the case for improvements and to secure the necessary investment to implement these. Partners will need to consider how best to cooperate to realise the economic potential of improvements.

At Wisbech the emerging Garden Town proposal may result in up to 12,000 additional homes (on top of the 3,550 homes already allocated in the Fenland Local Plan) effectively doubling the size of the town. This is linked to a potential new rail connection which would put the town within commuting distance of Cambridge and Peterborough. The existing allocation relating to East Wisbech is incorporated into the emerging plan.

Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft

The ports of Great Yarmouth and Lowestoft are successfully developing their role in the huge growth in offshore wind generation and major planned gas field decommissioning in the southern North Sea, building on 50 years' experience in offshore energy.

These two ports, in close proximity, together form a strategically significant economic (and infrastructure) resource, generating employment and supply chains of regional significance. The sector is also supported by businesses and facilities, such as Norwich Airport, in Greater Norwich. The critical mass of facilities, infrastructure and businesses helps the area compete with areas elsewhere, including on the other side of the North Sea.

There is a long and continuing history of collaboration between Great Yarmouth, Waveney, Norfolk and Suffolk Councils to make the most of these opportunities.

Through close cooperation, these bodies and the LEP were successful in bidding for an Enterprise Zone (EZ) covering six sites in Great Yarmouth and Waveney to strengthen and build the offshore energy sector in the area. This EZ is one of the most successful in the country, the only zone to have exceeded the original EZ targets. The two Norfolk sites in Great Yarmouth are South Denes and Beacon Park.

Great Yarmouth Borough Council, Norfolk County Council, Highways England and the New Anglia LEP have cooperated closely on developing the road transport infrastructure to support the growth of the offshore energy sector in Great Yarmouth, with particular focus on bidding for a third river crossing, to provide direct access to the Port from the trunk road network, rather than through the heart of the town as at present, and improving the A47 link to the rest of the country.

Norfolk Coast, the Broads and the Brecks

The Norfolk Coast, the Broads and the Brecks are the 3 key cross boundary areas of the county where economic benefits include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and

environmental protection in surrounding areas. This is particularly the case for the Broads Executive Area, where the Broads Authority boundary is very tightly drawn.

In order to maximise the economic benefits a number of issues require coordination across planning authority boundaries, including coastal change, erosion and flooding; environment, landscape and habitats; as well as tourism and recreation itself. By working together the relevant authorities can ensure complementary measures, and maximise potential economic benefits.

All the Norfolk coastal districts, together with the Broads Authority (part of which is on the coast), Waveney District Council in Suffolk, and the Environment Agency have worked together on one or more of the three Shoreline Management Plans covering the Norfolk Coast, developing understanding of the technical and political challenges involved, and coordination of efforts to address these.

The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared

A10 corridor

The A10, and parallel rail line from King's Lynn to Cambridge (passenger and freight), provides a strategic transport corridor. The section from King's Lynn to Downham Market is identified as a growth location in the New Anglia SEP. To realise the growth potential of the A10 Corridor there is a need to improve journey times, reliability of services and enhancement of operational capacity. Cambridgeshire County Council have commissioned studies of the economic potential and transport options for the route north of Cambridge. A feasibility study is underway to strengthen the case for the Ely area improvements (road and rail) to enable more frequent rail services to operate in future; while longer peak hour trains should be able to run from King's Lynn by the end of 2018. A new Cambridge North railway station recently opened enabling improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents once longer trains are up and running. There is potential for large-scale job growth in the corridor at Downham Market; while the largest housing allocation in the west at West Winch/North Runcton requires the completion of the West Winch Relief Road and Hardwick junction improvements to be fully developed.

Agreement 9 - The emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

5.4 Strategic Principles of Economic Success

It is clear that Local Authorities will need to continue to work collaboratively with one another, LEPs and businesses in order to deliver the step change in economic performance that is necessary to deliver the shared objectives. Among the measures that are thought likely to be necessary at this stage are:

Supporting future economic growth

- supporting the development of businesses in identified priority sectors, including building on and making links with established and emerging clusters, and the provision of land and premises;
- facilitating physical regeneration and enhancement projects in areas of deprivation, involving the local community in the process;
- encouraging international trade and supporting increased inward investment

Education and skills

- supporting the creation, expansion and enhancement of education establishments, including further education, technical institutes and universities to increase the level of skills in the workforce; and
- enhancing the quality of the natural and built environment to ensure that the area remains attractive for its quality of life, and as a location for business.

Connectivity

- supporting employment allocations that minimise travel distance and maximise the use of sustainable transport modes;
- ensuring that investment in strategic transport infrastructure demonstrably supports economic growth, and also ensuring that economic strategies and Local Plans support the case for investment in that infrastructure; and
- enhancing the provision of infrastructure to enable digital connectivity that will facilitate economic growth.

Section 6 – Housing

Strategic Housing Objectives

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

6.1 Introduction

The overall objective of national policy is to ensure that sufficient homes of the right type, are built in the right locations, and at the right time to address all existing and newly arising needs for homes. This means meeting both the market *demand* for new housing and addressing the *need* for homes including the needs of those who are currently unable to afford to buy or rent a suitable home locally. Homes built should be of the right type having regard to needs of the existing and future population and should address the specific needs of groups such as the elderly, those with disabilities, students and the gypsy and traveller community. Local Plans should include measures to address the need for appropriate specific types of dwellings. These could include for self-build, starter homes and other tenures of affordable housing.

In February 2017 the Government published the Housing White Paper “Fixing our Broken Housing Market”³³. This document sets out a broad range of reforms that Government plans to introduce to help reform the housing market and increase the supply of new homes. Alongside the White Paper a number of supporting technical documents which provided the evidence underpinning many of the white paper proposals were also published and the government has recently launched a Housing Infrastructure Fund³⁴ targeted at unblocking delayed developments. It is clear that increasing the delivery of new homes is likely to remain a major priority for the UK government for the foreseeable future and the issue of delivery is considered further below.

³³ Available at <https://www.gov.uk/government/collections/housing-white-paper>

³⁴ Available at <https://www.gov.uk/government/publications/housing-infrastructure-fund>

By 2036 the population of the County is expected to grow from an estimated population in 2016 of 889,800 to 1,00,2000³⁵, a rise of 113,200 or 12.7%. Much of this growth is driven by net inward migration and an increase in the aging population.

Based on this population projection the evidence³⁶ suggests that the Norfolk Authorities will need to collectively plan for approximately an additional 84,000 (approx. 4000 per annum) homes between 2015 and 2036. Many of these new homes are already included within adopted Local Plan documents. In most parts of the County housing delivery rates have fallen behind existing plan targets and although building rates have improved in recent years the Authorities are currently aiming to deliver around 4,900 homes per year to address earlier shortfalls.

Since the draft NSF was published for consultation the government published a proposed standard approach to assessing local housing need. Overall this proposed methodology suggested that the annual housing need of Norfolk was similar to the needs that had been identified by the local authorities through the production of the Strategic Housing Market Assessments. The draft NSF had identified annual housing need as 3,966 homes whereas the standard methodology suggested a figure of 4,106 (3.5%) higher. Additionally the local authorities had, previously in draft agreement 16, suggested that they would agree to “The quantity of homes planned will be increased by a buffer equal to not less than 10% of their OAN requirement, such buffers to be treated as additional supply rather than as part of their housing target” and in agreement 13 the authorities producing the Greater Norwich Local Plan had suggested they would accommodate a further uplift from the City Deal. It is as yet unclear as to whether either uplift would be considered necessary on top of the need calculated by its proposed standard methodology.

Notwithstanding the overall similarity at the County level between the figures contained within the draft NSF and those within the government’s proposed methodology, the picture varied more considerably at the level of individual district, with each District figure being at least 15% different from that which had been locally calculated. This difference is illustrated in the table over the page.

³⁵ Mid 2014 based ONS population projections

³⁶ Central Norfolk, King’s Lynn and Great Yarmouth Strategic Housing Market Assessments

Table 8: Objectively Assessed Need (OAN)

Area	Annualised housing need Table 8 of draft NSF	Annualised housing need in proposed govt methodology	Difference
Breckland	584 ³⁷	680	+96 (16.4%)
Broadland	389	528	+139 (35.7%)
Great Yarmouth	420	338	-82 (-19.5%)
KLWN	670	525	-145 (-21.6%)
North Norfolk	405	511	+106 (26.2%)
Norwich	724	602	-122 (-16.9%)
South Norfolk	763	922	+159 (20.8%)
Broads Authority (Norfolk part)	11	n/a ³⁸	n/a
Norfolk	3,966	4,106	+140 (3.5%)

This potential different distribution of housing needs across the County potentially raises a number of cross boundary issues that will need careful consideration moving forward and it is clear that the agreements previously suggested will not necessarily be able to be maintained if the proposed standard approach is imposed on the local authorities. This matter will need further consideration in the early part of 2018 when the government announces its response to the consultation it has conducted and produces the draft revised NPPF.

It would appear that impacts of the considerable fluctuations at District level will be moderated by the fact that Broadland, Norwich and South Norfolk are intending to produce the Greater Norwich Local Plan allowing for redistribution of needs across the plan area. Furthermore, as Breckland District Council submitted its emerging Local Plan in November 2017 it will be covered by the transitional arrangements proposed in the consultation paper meaning that the assessment of OAN will be based on the Central Norfolk SHMA rather than the proposed standard methodology.

However, there will be a need to consider whether the scale of uplift in housing rates suggested for North Norfolk District is capable of being delivered without compromising either the principles of sustainable development or the special qualities of the District. This work will need to be done collectively in early 2018 as it could lead to potential redistribution of housing to elsewhere in the County.

³⁷ Note as the Breckland Local Plan is covering a period of 2011-36 its annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

³⁸ The Government Consultation said 'where local planning authorities do not align with local authority boundaries, such as National Parks, the Broads Authority and Urban Development Corporations, available data does not allow local housing needs to be calculated using the standard method set out above'. In these cases we propose that authorities should continue to identify a housing need figure locally, but in doing so have regard to the best available information on anticipated changes in households.

For the time being the agreements previously proposed for housing are proposed to be retained but it should be noted that these only apply insofar as the current evidence base of the SHMAs relate to and will need to be reviewed if the standard methodology is imposed.

6.2 Existing targets, supply, and delivery rates up to 2021

The NPPF requires that when Local Plans are prepared they plan for the required quantity of homes and that this quantity is deliverable over the period covered by each plan. In addition each authority should ensure that for each rolling five year period there are sufficient deliverable sites available to meet identified housing targets, address any historical shortfalls and provide for a buffer of either 5% or 20% of additional deliverable supply as a mechanism to extend choice and help ensure targets are met.

The number of dwellings built in the County since 2007 have generally fallen behind published Local Plan targets due to the impact of the recession. As a consequence, the required annual rate of housebuilding required to meet targets has been increasing by arithmetic as the targets seek for any shortfall in housing provision to be met in full over the plan period or the next five years (depending on the precise methodology). Additional uplifts in targets over the next five-year period are also necessary where there has been persistent under-delivery, to provide more choice and competition in the market. This can result in some areas having very high levels of deliverable housing sites that need to be identified in order to meet housing needs in the next five years.

It is likely that this trend of increasing annual rates of housebuilding requirements will not continue in the future, for two reasons: firstly, the rate at which housing is being delivered is increasing; and secondly, local planning authorities need to keep their assessments of housing need and local plans up to date. In reviewing housing need, the appropriate level of backlog that needs to be addressed is reconsidered and in parts of the County it appears that current levels of backlog arise in part from historic projections of levels of net in-migration in the period 2008-16 being considerably higher than the actual net in-migration levels that were observed during this period. Therefore, as new Local Plans are adopted, there may be tendency for rates of housebuilding required in the short term (i.e. the next five years) to reduce from their current levels due to reassessment of the backlog element within them.

It should also be noted that land supply issues may ease because since the recession and particularly the publication of the National Planning Policy Framework in 2012, the number of unbuilt planning permissions has also been increasing, so that by the start of 2016 there was a large stockpile of consented sites. Across the county as a whole, the Authorities assess that some 30,000 new dwellings could be built in the five years between 2016 and 2021 from currently available sites.

In practice, delivery rates of housing development will vary considerably from one year to the next, with significant periods of under-delivery in some years and over-delivery in others, depending on a wide range of factors including site availability, economic conditions, and the capacity of the local building industry. For this reason annualised targets represent a blunt instrument against which to assess delivery. Individual authorities will continue to consider carefully how new housing needs evidence might be taken into account appropriately in plan-making and the determination of planning applications.

Detailed information on the availability and deliverability of new housing is published annually by each authority in their Five Year Land Supply Statements.

6.3 Future Housing Demand and Need 2015-2036.

The National Planning Policy Framework requires that the Objectively Assessed Need (OAN) for homes within defined Housing Market Areas (HMAs) is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Working with others, Local Authorities should determine their OAN over an identified period and plan to ensure that this is addressed.

The evidence³⁹ concludes that Norfolk is covered by all, or parts of, three separate Housing Market Areas and this has led to agreement about producing evidence and appropriate planning areas.

Strategic Housing Market Assessments have been prepared for each of these Housing Market Areas which identify the objectively assessed needs for new homes within each HMA. This evidence has also been used to derive OAN figures for each planning authority area. New evidence, including revised national population and household forecasts, will be published at regular intervals and Authorities will use the latest available information from a range of sources in relation to both demand, and their ability to plan a sustainable supply, when determining final housing targets for inclusion in Local Plans.

To ensure better alignment of Local Plans all Norfolk Authorities have agreed to prepare new Local Plans which address the level of housing need for the period until at least 2036 and most have formally commenced the process of plan review. The latest Strategic Housing Market Assessments conclude that approximately 84,000 new homes (4,000 pa) will be required in the County between 2015 and 2036. As outlined earlier, a significant proportion of this is already included within the adopted Plans of the authorities, has planning permission or is under construction. New Local Plans being prepared by the Planning Authorities will need to address the remainder and clearly show how the OAN for each Housing Market Area is being addressed.

The current process of establishing OAN and translating this into housing targets is a complex one and the required approach and the underpinning evidence is subject to periodic change. Further changes have been signalled in the Housing White Paper and the recent consultation on Planning for the Right Homes in the Right Places. Furthermore whilst Housing Market Areas are by definition relatively self-contained there are clearly wider relationships with parts of Suffolk, Cambridgeshire, Lincolnshire and the wider south east which should be taken into account when determining housing targets for inclusion in Local Plans. It is not the role of this Framework to set the housing targets for individual Local Plans but to ensure that sufficient homes are built. All Norfolk Authorities have agreed to prepare Local Plans, either individual or joint plans, which will aim to deliver *at least* enough homes to address all OAN until at least 2036.

³⁹ **Central Norfolk Strategic Housing Market Assessment 2017** - covering Norwich, Broadland, and South Norfolk authorities, together with substantial parts of North Norfolk, Breckland and the Broads Authority, together with a more marginal interaction with other parts of Norfolk and Suffolk.

King's Lynn and West Norfolk Strategic Housing Market Assessment – Covering the administrative area of King's Lynn and West Norfolk Borough Council.

Great Yarmouth Strategic Housing Market Assessment - Covering the administrative area of Great Yarmouth Borough Council.

Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Table 9: Objectively Assessed Need (OAN) in Norfolk Housing Market Areas.
Source: CN SHMA 2017, KLWN OAN Update 2016, GY SHMA 2013, AMR 2016

Housing Market Area	Planning Authority Area	Total OAN identified in Assessment for the 21 years between 2015-2036	Annualised OAN
Central Norfolk SHMA**	Norwich City	15,201	724
	South Norfolk	16,032	763
	Broadland	8,160	389
	Breckland***	12,272	584
	North Norfolk	8,511	405
Central Norfolk Sub Total (excluding BA area)		60,176	2,865
King's Lynn and West Norfolk OAN Update 2016*	King's Lynn and West Norfolk	14,070	670
Great Yarmouth SHMA 2013*	Great Yarmouth Borough Council	8,820	420
Part Central Norfolk part Great Yarmouth HMA	Broads Authority (within Norfolk)	229	11
Norfolk Total		83,295	3,966

* Totals for Great Yarmouth and King's Lynn and West Norfolk assume annualised rates identified in published SHMAs are rolled forward to 2036. All SHMAs will be subject to periodic update and these updates and other evidence will be used to establish Local Plan housing targets.

** Based on CN SHMA June 2017 which reflects the 2014 household projections, excluding any additional provision needed to reflect the City Deal

*** Note as the Breckland Local Plan is covering a period of 2011-36 it's annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

The Broads

The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows: Table 9: Projected dwelling need within the Broads Authority area 2015-2036

	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
Total OAN	50	70	3	40	66	57

In view of the special qualities of the Broads there has been a long standing agreement between the BA and their overlapping local councils about the other areas planning to meet any housing needs arising in the BA area⁴⁰. Following various legal cases it has been considered necessary to change this historic approach and for the OAN to be calculated for the BA area. However, it would clearly not be in the best interests of good planning in Norfolk for planning in the Broads area to be driven by a need to meet statistically derived housing targets where this would be incompatible with the protection of the special qualities of the Broads.

Agreements 11 and 12 below addresses this matter although it should be noted that emerging evidence suggests, with the possible exception of the part of the BA area in Great Yarmouth Council area, that the BA will be able to find sufficient sites for housing to meet identified needs within its own area in locations considered to be compatible with the protection of the Broads.

Agreement 11 – The Broads Authority will meet its calculated portion of the wider housing need within each of the relevant SHMAs, as far as is compatible with the protection of the Broads landscape and special qualities.

Agreement 12 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Waveney District Council in Suffolk (and hence not signatories to this framework) have also agreed to do the same.

Implications of the City Deal for Housing

In December 2013 the Greater Norwich City Deal was signed⁴¹. The City Deal was expected to see 300 new businesses supported and secure an additional £100 million of private investment. The deal was also expected to create more than 19,000 jobs, including 3,000 high value jobs at Norwich Research Park, 2,000 jobs around Norwich Airport, 1,000 jobs based around Norwich University of the Arts and 6,000 construction jobs.

⁴⁰ See http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf

⁴¹ See <https://www.gov.uk/government/publications/city-deal-greater-norwich>

The housing implications of the City Deal were assessed thoroughly as part of the Central Norfolk SHMA. This calculated that the total adjustment needed to ensure sufficient homes are provided to meet the needs of the additional workers resulting from the City Deal was 9,505 over the period 2015-2036 across the five Central Norfolk Districts. However, as the OAN for the Central Norfolk Authorities already includes a response to market signals uplift, additional provision is only needed in the three Greater Norwich districts where the implications of the City Deal exceed the response to market signals already built into the figures.

Agreement 13 – In addition to their OAN, Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of 5,228 homes⁴² within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

6.4 Type of Homes

It is critically important to ensure that sufficient homes are provided but it is equally important that the homes that are built are the right type in terms of size, affordability and tenure. In this regard key issues affecting the County are providing suitable homes for:

- Those on lower household incomes who are unable to afford market prices and rents
- A rapidly aging population
- A growing student population in and around Norwich
- Gypsy and Traveller communities

Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations.

Unless there is a significant increase in earnings or a slowing rate of house price increases the evidence concludes that dwelling affordability will continue to be a major issue in most parts of the County. Delivery of affordable homes, as with other types of housing has failed to keep pace with existing and newly arising needs. Forecasts indicate that across the County as a whole some 26% of the total future housing requirement will need to be provided as affordable homes but this masks significant local variations.

The significance of this issue for Norfolk should not be underestimated. There would be particularly severe impacts on a number of key economic sectors if housing affordability worsens and there is not considerable increases in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. Essentially the situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

⁴² Paras 5.6-13 and table 96 of the Central Norfolk SHMA 2017 explain this in some detail. Overall if the additional jobs envisaged under the City Deal are delivered the requirement for housing in Greater Norwich will increase by 8,361 over the period 2015-36, however, 3,133 of this is already captured in the Objectively assessed need figure due to the response to market signals, therefore the additional requirement if City Deal job growth levels are achieved is 5,228 homes.

Inward migration from the rest of the UK, mainly due to retirement to the area, is forecast to be the major driver of population growth in the County over the next 20 years and a rapidly aging population, particularly outside of the three main urban centres will continue to increase the need for homes. By 2036 over 15% (163,000 people) of Norfolk's population is forecast to be over 75 years of age and if current trends continue this will increase the need for specialist forms of accommodation such as care, nursing and assisted living schemes. These specialist accommodation needs are not included within household projections and authorities should carefully consider the latest available evidence⁴³ and develop strategies to ensure these needs are met. If current trends continue an increasing proportion of elderly people will remain in their homes for longer periods.

Specialist types of accommodation

Strategic Housing Market Assessments are prepared to establish the likely total need for new dwellings over a given period. These assessments quantify the needs of those residing in households including gypsy and travellers and those living in caravans and houseboats but they do not account for those living in other types of communal accommodation such as care and nursing homes and student halls of residence. Therefore in addition to the target for new dwellings Local Plans will need to separately quantify and provide for other specialist types of accommodation and fully understand the relationship between the need for new dwellings and the need for different types of non-household accommodation.

Elderly People

The identified OAN of approx. 84,000 dwellings across Norfolk includes the conventional housing needs of elderly people, but does not include people residing in care and nursing homes. On this basis, all self-contained elderly person housing is counted within the housing supply; but the supply of bed spaces in residential institutions (Use Class C2) is not. If sufficient Class C2 bed spaces are not provided in the period 2015-36 then these people will not vacate existing dwellings and therefore more dwellings may be required. Evidence indicates that the current supply of beds in Care homes for Norfolk is estimated to be 9,921; this is around 660 beds less than the current identified need for 10,581 spaces. If current trends and policies continue and the proportion of people living in care homes remains static the estimated need in Norfolk by 2036 will be 17,949 beds, this is 8,028 more beds than the current supply and is equivalent to an increase of 382 beds per year. The study⁴⁴ also provides information on the distribution of existing and needed bed spaces throughout Norfolk.

Student Housing and the OAN

Planning Policy Guidance was updated in March 2015 to include specific reference to identifying the needs of students. It requires that Local Planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campuses.

The largest higher education provider in Central Norfolk is the University of East Anglia (UEA). The University has a campus in Norwich and a total of over 14,500 students, with around 90% of UK

⁴³ Norfolk Accommodation Needs of the Elderly Study 2016.

⁴⁴ Norfolk Accommodation Needs of the Elderly Study 2016

national students being full time (academic year 2016-17) and the remainder being part time. The University currently maintains 4,300 bed spaces on campus. Norwich also contains the Norwich University of the Arts which has 1,900 full-time students, City College with 11,000 full and part-time students and Easton College with 300 students.

The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes. If accommodation is provided in the form of student halls of residence or other specialist student accommodation provided by the private sector the OAN dwelling requirement can be reduced accordingly at a suggested ratio of one dwelling reduction for each three bed spaces provided.

Accommodation needs of Gypsies, Travellers, and other types of accommodation

The accommodation needs of Gypsies and Travellers, including Travelling Showpeople, and those residing in boats and mobile/park homes are included within the overall assessments of housing need and comprise part of that need rather than an additional requirement. These types of accommodation which are provided can therefore count towards addressing locally set housing targets. Locally authorities have prepared specific evidence to quantify the levels of need for such accommodation and use this evidence to inform Local Plan preparation. Five Norfolk authorities (Broadland, Gt Yarmouth, North Norfolk, Norwich and South Norfolk), plus the Broads Authority, commissioned a Caravans and Houseboats Needs Assessment to 2036, which was completed in October 2017⁴⁵. Breckland DC commissioned its own study⁴⁶ and the Borough Council of King's Lynn and West Norfolk is a partner in a Cambridgeshire-based needs assessment⁴⁷.

Agreement 14- The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Other forms of specialist accommodation such as self-build and accommodation for military personnel will be addressed by individual authorities but the Norfolk Strategic Planning Member Forum will keep this position under review.

Considerable comment was made on this document during the consultation stage that more should be done to control the impact that second homes and holiday homes are having on the availability and affordability of residential accommodation generally and particularly in coastal areas of the County. Whilst there may be significant concerns on these matters in parts of the County, and there are a range of actions that local councils are taking to promote the provisions of affordable and open

⁴⁵ See <https://www.south-norfolk.gov.uk/sites/default/files/Norfolk-Caravans-and-Houseboats-Needs-Assessment.pdf>

⁴⁶ See https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf

⁴⁷ See https://www.scambs.gov.uk/sites/default/files/2016_11_14_cambridgeshire_gtaa_final_report.pdf

market housing which meets the needs of local people, in practice there is nothing that can be done under the current legislative framework to control the occupancy of the existing housing stock in the way that appears to be favoured by a number of respondents of the draft NSF.

6.5 Capacity and Distribution

Some parts of the County are more constrained than others and their capacity to accommodate new growth is similarly variable.

Each Authority has, or is, preparing Housing and Economic Land Availability Assessments (HELAAAs)⁴⁸ using a standardised methodology which has been agreed by all Authorities. These are assessments of unconstrained capacity and take no account of the policy choices that each authority may make when preparing their Local Plan. Although this work has still to be completed it is anticipated that Norwich City, Broadland and South Norfolk will work jointly to address their shared housing need through the Greater Norwich Local Plan with other District Authorities having the capacity to address its own housing need.

Agreement 15 – All Local Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

6.6 Delivering Housing Growth

Over the past decade the quantity of new homes delivered in the County has not kept pace with published targets notwithstanding that the number of planning permissions granted typically exceeds the required quantity of development. This is likely to have been compounded by economic recession and poorer housing market conditions in some areas which may have reduced developer confidence.

Slower than required delivery rates have resulted in inadequate or marginal five year land supply positions resulting in the need to release unplanned development sites in some parts of the County. Recognising this, and reflecting the provisions of the recently published Housing White Paper the Norfolk Authorities have agreed to take a range of actions to improve future housing delivery. The situation will be reviewed in Spring 2018 in light of the new government methodology once this is published and the impact this will have on OAN for each district can be ascertained.

Agreement 16 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

⁴⁸ Housing and Economic Land Availability Assessments

However, such is the scale of delivery challenge facing the County there may well be the need for further actions to be taken to ensure housing targets can be met. Norfolk authorities have jointly commissioned a study to look further into the issues impacting delivery within the county. The report highlighted 10 measures to be considered which will be further addressed by Local Authorities in bringing forward their Local Plans:

- Allocating a balanced range of sites and scales of development
- Enable early stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage.
- Support and encourage allocation and development of retirement developments, bungalows, lifetime homes and extra care facilities for independent elderly living in suitable environments
- Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites
- Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff may be a shared resource between neighbouring authorities.
- Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions.
- Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes.
- Facilitate the creation of a county-wide developer forum
- Consider whether statutory powers can be used to assist with unlocking difficult sites
- Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL.

Alongside these possibilities there may also be other measures taken which would complement these actions:

- Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. Increasing the number of housebuilders active in the Norfolk market and increased use of modular (off-site) building techniques will also assist here;
- Action to stimulate the SME's in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided; and
- Action to stimulate the self and custom build sector considerably.

- Further joint working to improve the speed, customer focus, predictability and efficiency of the planning system; and
- A considerable drive to increase the number of people entering the construction sector across the board, particularly in the light of the probable impact of Sizewell C construction on the market of skilled construction labour in Norfolk.

The Norfolk Strategic Planning Member Forum is likely to give consideration to whether there is any benefit in doing further joint work on delivery issues in 2018.

Section 7 – Infrastructure and Environment

Strategic Infrastructure and Environmental Objectives

To realise the economic potential of Norfolk and its people by:

- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.
- strengthening Norfolk's place competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions as well as the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel away from car use towards public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

To improve the quality of life for all the population of Norfolk by:

- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land; where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and, enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

7.1 Introduction

Infrastructure and Environmental objectives have been considered together in the context of the Norfolk Strategic Planning Framework. The issues addressed are complex and multi-faceted and much of the work that has been completed on this subject by working closely with appropriate expert groups.

As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, it's historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought. Yet, as is also noted, Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England and will need significant enhancement if growth is to be delivered at the scale envisaged without compromising the quality of life and environment on offer.

It would appear that there is a growing recognition of the comparative under development of Norfolk's Infrastructure and a number of announcements have been made about funding of investment in key infrastructure enhancements, especially in relation to transport. These are detailed later in the document and it will be important to ensure timely implementation of these projects.

The Infrastructure Delivery Plan⁴⁹ (IDP) has been produced by the County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the IDP reflect the key

⁴⁹See <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies>

infrastructure needed to deliver the scale of growth ambitions outlined in the NSF. The IDP is a working document that will be regularly updated as information becomes available. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

7.2 Utilities

To deliver the rate of growth that is planned across Norfolk in the coming years considerable further investment will be needed in utilities infrastructure. A list of the main schemes that are thought to be necessary is outlined below.

Table 10: Priority Utilities Projects for Promotion⁵⁰

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Easton, Hethersett and Cringleford sewerage upgrade	Delivery 2011-2026	TBC	Private sector
Northeast Norwich Trunk Sewer	Delivery 2011-2026	TBC	Private sector
North and Northeast Norwich substations	Not Known	TBC	Community Infrastructure Levy and private sector
Snetterton energy supply	2017/18	£3.1m	Local Enterprise Partnership. Private sector, Local Authority Funding now agreed
Thetford energy supply	Not Known	£6.5m	Growth Deal and private sector
Thetford water supply	Not Known	£9.78m	TBC
Thetford Sewage Scheme	Not Known	£2m	TBC
Earlham Substation	Not Known	TBC	Community Infrastructure Levy and private sector
Heigham Water Works	Not Known	£30m	Private sector
Wymondham water supply connections	Not Known	£22m	Private sector
King's Lynn Sewerage improvements	Not Known	£1-1.2m	Community Infrastructure Levy and private sector
Increased surface water capacity North Lynn	Not Known	TBC	IDB/private sector

⁵⁰ The preparation of Anglian Water's Long Term Recycling Plan is currently at an early stage and is due to be formally published, following consultation, in summer 2018. It relates to the investment that will be made by Anglian Water as part of our business plans which are prepared once every 5 years to ensure that there is sufficient sewage treatment capacity to accommodate growth within our region. Water and wastewater infrastructure is funded and delivered through a combination of investment made by Anglian Water through their business planning process and developer contributions for water supply and foul sewerage network improvements which are sought under the provisions of the Water Industry Act 1991. As such there are existing mechanisms to ensure that any improvements are made to the water supply and foul sewerage networks to serve new development.

7.3 Electricity

Provision of energy, particularly electricity is fundamental to housing and economic growth as energy consumers require access to reliable energy supplies. Since 2004, the UK have been a net importer of energy, and this has changed the way we view our energy security (Annual Energy Statement 2014). Housing and employment growth will put a greater strain on the electricity network with many of the primary substations in Norfolk already reaching capacity.

The 33kV main transmission network in Norfolk is the main network for new on-shore electricity providers and major users such as employment sites and large scale residential development. It is essentially three networks with one in the west serving King's Lynn and West Norfolk and extending in a limited way into the western side of North Norfolk and Breckland; one centred in Norwich and extending to Attleborough and the central and eastern parts of North Norfolk; and one serving the towns along the southern border and extending round to Great Yarmouth. This leaves significant, largely rural, parts of the county some distance from potential connections to this network. This particularly applies to a central swathe running north south, and a southern swathe running east west.

The electricity network is subject to a number of operational constraints which challenge the ability to predict the future capacity of substations over the time periods that are typical for Local Plans. UK Power Networks (UKPN) will not normally invest to provide additional unassigned capacity and the costs of capacity upgrades falling on developers can be significant. The ability of developers to reserve supply, and unexpected windfall development adds further uncertainty to the forward planning process. In addition, the power requirements of end users of employment sites can vary significantly and are unknown at the time the land is allocated in a Local Plan.

In developing Local Plans it is clear that Local Authorities will need to work closely with UKPN to ensure that identified locations where housing and employment growth will require strategic enhancement of the electricity supply networks to support new developments can be delivered without delaying the delivery of development or rendering it unviable. Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments.

Additionally all Local Plans across Norfolk will need to promote new developments which minimises energy use; minimise reliance on non-renewable or high-carbon energy sources and promote and encourage the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies ensure that investment decisions help promote growth and overcome constraints and there are forward looking decision on energy investment.

7.4 Water

Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality, including the Broads

Anglian Water supplies water to the majority of Norfolk county with parts of Great Yarmouth and the Broads Authority being served by Essex and Suffolk Water. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

Anglian Water's Water Resources Management Plans to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development through appropriate supply and demand measures. Consideration is given to reducing the potential demand for water before proposing supply measures.

Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

Agreement 17 –Norfolk is identified as an area of serious water stress, the Norfolk Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

The disposal of waste water can be more challenging and impacts decisions on the location and phasing of growth. The capacity of sewage works, the capacity of receiving water courses and quality of outputs are all strategic issues.

It will be necessary to take a co-ordinated approach to water through water cycle studies to address water supply, quality, waste water treatment and flood risk. Flood risk assessments should be used effectively to ensure development is located appropriately, to help achieve this a Strategic Flood Risk Assessment (SFRA) has been commissioned jointly by most Norfolk authorities.

The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development to ensure that water quality is protected or improved, with no detriment to areas of environmental importance. Growth in several parts of the county is dependent on investment at sewage treatment works. The timing of these investments will have an important effect on the phasing of development.

Agreement 18 –The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. Each public body will have regard to River Basin Management Plan⁵¹ to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).

7.5 Telecoms

Broadband

Having access to high-speed and reliable broadband is now regarded as essential by many residents and businesses. The picture regarding superfast broadband coverage is rapidly improving, nearly 88% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁵², and through the extension of the Better Broadband for Norfolk (BBfN) programme it is aimed to make high-speed broadband available to more than 95% of Norfolk's premises by spring 2020.

The BBfN project was launched in 2012, with the aim of ensuring that by the end of 2015 more than 80% of Norfolk's premises could access superfast broadband (24 Mbps download, also known as Next Generation Access (NGA)). A second phase of the project, the Superfast Extension Programme, will help Norfolk reach the national target of 95% of UK homes and businesses by March 2018, which the Government has subsequently brought forward to the end of 2017.

It is difficult to get accurate maps showing currently available download speeds across Norfolk, as the situation is changing constantly. But a map produced by Better Broadband for Norfolk (BBfN) in 2016, and reproduced below, shows the availability of Next Generation Access (NGA) broadband across the county⁵³.

⁵¹ See <https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan>

⁵² See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

⁵³ Interactive up to date maps are available at <http://www.betterbroadbandnorfolk.co.uk/>

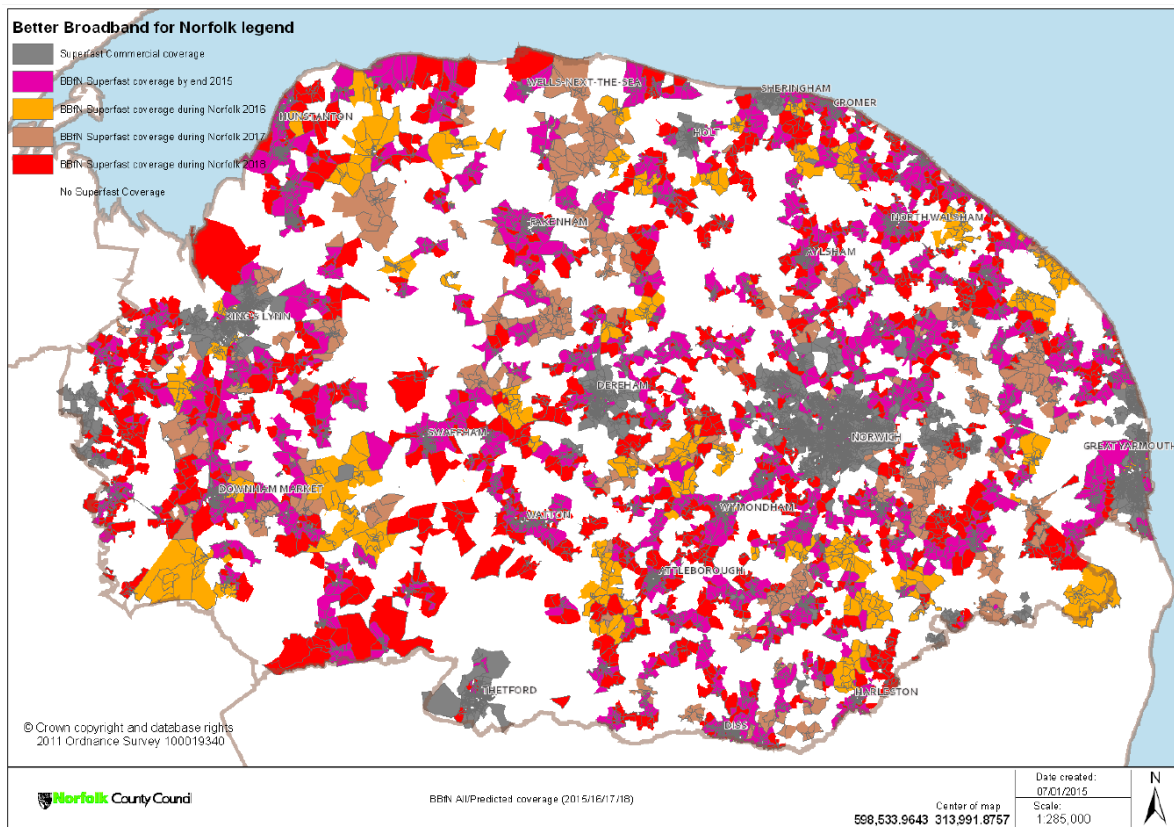


Figure 7: Map showing Next Generation Access (NGA). White areas don't have NGA broadband services.
Source: Better Broadband Norfolk, 2016

Areas where the existing broadband connection speed is less than 2Mbps are classed as “basic” broadband connections, and are not scheduled to receive improvements in the immediate future. However, they can apply for a subsidy towards the installation and setup of a satellite broadband solution.

In order to extend the provision of superfast broadband further, additional funding would be needed. Where this is not possible or feasible, wireless (Wi-Fi) solutions can be investigated as well as satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable.

In April 2016, changes to Building Regulations R1⁵⁴ were finalised. For applications made on or after 1 January 2017 new buildings are required to have physical infrastructure to support high-speed broadband (greater than 30Mbps). However, there is no requirement to provide external or site-wide infrastructure beyond the access point.

⁵⁴ See

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf

The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could require high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans.

Mobile telephony

Mobile telephone connectivity has, like broadband, become increasingly important. The most significant change in recent years has been the rollout of 4G services.

Coverage in Norfolk

Interactive mapping (available from Consumer Group Which⁵⁵) shows the general coverage for 2G, 3G and 4G data across Norfolk. The majority of areas across Norfolk receive a weak 2/3/4G signal, with the strongest signals in Norwich and market towns such as King's Lynn and Great Yarmouth. However, this data must be treated with degree of caution as the results are high-level and there are large areas where data is unavailable.

Nevertheless many mobile "not-spots" remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, although there are plans to improve this: for example, EE announced in 2016 that it intends to achieve 95% UK geographical coverage by 2020.

The next generation of mobile networks will be 5G. Whilst there is no agreement as to the precise standards of 5G, it will probably encompass the following:

- 60-100 times faster than 4G Instantaneous playback from downloading speeds and
- Sufficient bandwidth to enable a multitude of internet-connected devices to communicate effectively.

5G uses higher frequency radio bands which travel less well than 4G, and can be disturbed by buildings, trees, weather etc. Significantly more base stations, booster stations and new antenna technologies will be required. The rollout of 5G commercially is expected to commence in 2020, and take several years to complete. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSF.

By the time most of the next rounds of Local Plans have been adopted, 5G will be a reality (2020). The main benefit of 5G is that it could, in theory, provide ultra-high speed broadband access to all, without the bandwidth capacity challenges of 4G. This should enable location to be much less of a

⁵⁵ <http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map>

barrier to receiving broadband than previously, with benefits for homeowners and businesses. It could remove a barrier to location of employment opportunities, particularly home-based and rural-based businesses.

The main disadvantages appear to be that further base and booster stations will be required to ensure adequate coverage. As with 4G, it is likely that commercial considerations will play a role in coverage (particularly in the early days of 5G) but authorities will do all they can, through liaison with mobile providers, to ensure that rural areas of Norfolk get 5G as early as possible.

The key conclusion is that some consistency of approach from all Norfolk Planning Authorities is clearly important for 5G if the very high degree of nationwide coverage required for 5G to be effective is to be secured. Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be constructed, and common development management policy text to facilitate this should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes.

Agreement 19 - To maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities will seek to engage with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. The aim is to get this guidance agreed before the end of 2018 with it potentially being included in emerging Local Plan documents.

7.6 Social Infrastructure

Health

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to ensure that the health and wellbeing of the population, and health infrastructure is considered in plan and decision making.

The need for health infrastructure provision takes place in the context of:

- An increasingly ageing population, with impacts on health and social care provision and costs⁵⁶
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse. In 2009/10 alone, physical inactivity cost local healthcare authorities £6.2 million per year⁵⁷.
- Increasing problem of obesity and associated costs. A quarter of the UK's population is obese costing the tax payer £2.47bn a year⁵⁸, and if current trends continue over 50% of the population is predicted to be obese by 2050⁵⁹.

⁵⁶ The King's Fund: Future Trends, Demography, Ageing Populations

⁵⁷ British Heart Foundation, 2013: Economic costs of physical inactivity.

⁵⁸ Institute of Economic Affairs, 2017: Obesity and the Public Purse.

⁵⁹ NHS, 2015: "Britain: The fat man of Europe"

- Increase in demand for mental health and wellbeing services which continue to be affected by cuts.⁶⁰
- Changing approaches to healthcare delivery.

It is clear that health issues will become increasingly important considerations in the future planning activities. Therefore, development should facilitate a healthy lifestyle and provide opportunities for a high quality of life through a healthy environment where pollution is controlled and there is adequate access to open spaces and Green Infrastructure. Availability of suitable and affordable housing and employment opportunities are also important factors.

To ensure this happens work has been undertaken on developing a protocol for joint working between planning, public health and health sector organisations since 2015. Throughout this period support has come from several quarters, including each of the Norfolk Clinical Commissioning Groups (CCGs). The Protocol seeks to explain the relationship of land-use planning to public health, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The Protocol also includes NHS England giving the opportunity for monitoring how population change from housing development could have an impact on all aspects of acute and primary care services across Norfolk.

The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development. To assist with such negotiations, appended to the Protocol is population modelling data to give an indication of future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The second appendix to the Protocol is a *Health Planning Checklist* that consists of six place-making themes. Use of the Checklist is not mandatory; it is simply made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application.

Agreement 20: The authorities agree to endorse *Planning in Health: An Engagement Protocol Between Local Planning Authorities*⁶¹, *Public Health and Health Sector Organisations in Norfolk* and undertake its commitments.

Assuming this is formally agreed it is expected that each Norfolk CCG will formally agree the Protocol via its Governing Body, and NHS England will do via senior officer support.

⁶⁰ Norfolk Community Foundation, 2016: New mental health and wellbeing ‘match funding challenge’ for Norfolk.

⁶¹See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/Health%20Protocol%20Final%201.2docx.pdf

Education

Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will continue to grow over the next 10 years.

Primary age population including the influence of housing with full permission will rise by around 4% and secondary by 22% (children currently in the school system including the additional 4% covered by growth). Further housing coming forward is likely to produce a higher increase percentage.

More specifically, September 2017 school population is over 1300 more than in 2016. Year 10 currently has the lowest cohort of children and numbers have risen steadily since 2006 when that cohort joined the school system in reception. September 2016 reception cohort was nearly 800 pupils higher than it was 5 years ago. Recent years have seen a significant rise in the birth rate and demand for pupil places across the area. Pressure is mainly in urban areas which have seen the highest concentration of population growth. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils.

Standards in Norfolk schools have risen considerably over the past 5 years with 88% of schools being graded Good or Outstanding in 2017 compared with 70% 4 years ago. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, e.g. Dioceses and Academy Trusts to develop local schemes.

Norfolk County Council's School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned.

However, it is difficult to summarise what the strategic infrastructure priorities are and who will deliver against these. Also in the light of recent planning decisions it is questionable to what extent primary and secondary education provision can be seen as a constraint on residential development. Nevertheless the following is agreed:

Agreement 21: The Local Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

7.7 Transportation

Considerable work has been completed in relation to transportation matters in support of the NSF. Notwithstanding the recent and very welcome announcements for further investment in infrastructure there will be a need for considerable further investment in transport infrastructure if this is not to constrain growth.

A background paper has been produced summarising the state of the County's transport network, providing much of the evidence base for the production of the NSF and subsequent Local Plans⁶². The paper aims to identify: the current state of the transport system; the constraints (current and future); and opportunities and includes a review of transport constraints to identify issues that, without resolution, may prove a barrier to growth.

Current Network

Norfolk is served by two trunk roads: the A11 from London and Cambridge, and the A47 from the west. The A47 continues from Great Yarmouth to Lowestoft. The A11 is fully dual carriageway and the corridor will see some of the largest scale growth planned in the county (at Thetford, Attleborough, Wymondham, Hethersett and the Norwich fringe at Colney/Cringleford). The A47 is a mix of single and dual carriageway, both within and beyond Norfolk.

Away from the strategic road network, Norfolk's road network is a largely rural, single carriageway network. Much of it has not seen significant improvement schemes and so journey times can be slow, particularly away from the higher standard A-class network.

⁶² See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx

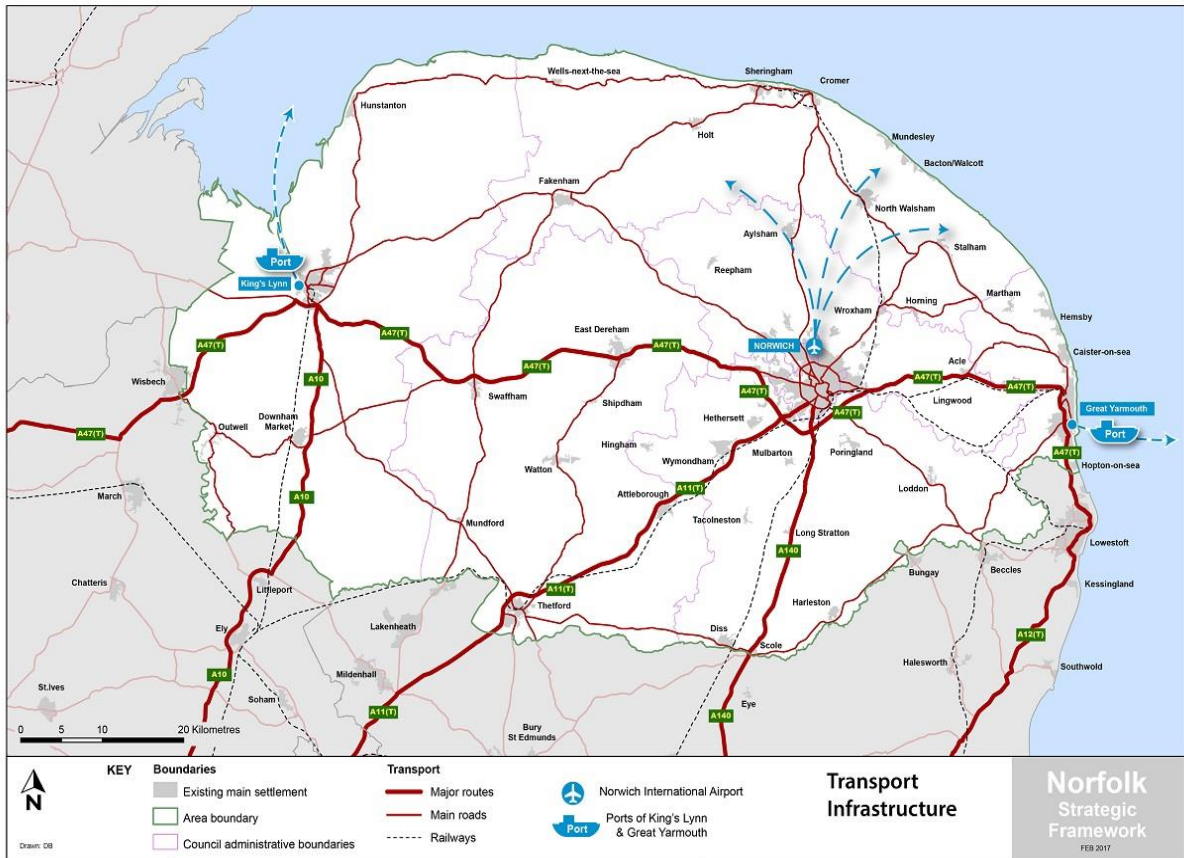


Figure 8: Norfolk Transport Infrastructure, 2017

Norfolk has a limited rail network, meaning that many of its towns are not served by rail. Also, the services offered provide a very limited range of destinations and frequencies. In particular, services to the Midlands and Home Counties are poor. Whilst rail generally provides faster journeys to other major centres compared to road, average rail speeds compare poorly with connections between major centres out of the County.

Norwich Airport is situated some 5km north of Norwich city centre. It operates a number of scheduled and charter flights and provides servicing for the offshore energy industries via helicopter flights. The airport terminal has capacity for 700,000 passengers per year. The airport is current consulting on a draft masterplan which envisages considerable growth in the coming years⁶³.

Great Yarmouth is the largest port in the county, seeing over 1,100 thousand tonnes of traffic in 2014, an increase of over 1/3 compared to 2013. Although 66% of this by tonnage is inward traffic there has been a tenfold increase in outward traffic since 2009, meaning that increasingly outward traffic has become more important to the port.

Levels of both walking and cycling to work are relatively high in Norwich. In South Norfolk and Broadland Districts levels of walking are comparatively lower than elsewhere in the county, probably

⁶³ See <http://www.norwichairport.co.uk/masterplan/>

reflecting that many people from these districts work in Norwich - too far to walk. A comprehensive cycle network has been identified in Norwich, and the city has also benefited from a large amount of funding that has been used to upgrade parts of the cycle network. There is still however a considerable amount of work required to upgrade the network in its entirety.

Accessibility by public transport to services and facilities is problematic in some more rural and isolated parts of Norfolk. Overall, accessibility tends to be poorest in the more rural districts of Breckland and West Norfolk, where there is a significant number of smaller villages, hamlets and isolated dwellings. Providing bus services within these smaller settlements is often unviable due to low population numbers.

Table 11 below lists some of the main committed road and rail projects that are planned to take place in Norfolk in the coming years. It will be important to ensure the timely implementation of these projects.

Table 11: Committed Transport Projects

Project Name	Estimated Start date	Estimated Cost	Funding sources
Norwich Northern Distributor Road	Started, open early 2018	£178 million	Funded - Government grant, growth deal and a local contribution
A47 Great Yarmouth Junctions	2018	TBC	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A140 Hempnall Roundabout	2019	£4.4m	NPIF, CIL, Developer funding, Growth Deal
A47 Blofield to Burlingham Dualling	2020	£50-£80 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A47 Easton to Tuddenham Dualling	2020	£100-£150 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A47/A11 Thickthorn junction	2020	£70 to £100 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
Great Eastern Mainline enhancements⁶⁴	Up to 2020	Unknown	Network Rail and Train Operating Company (Abelio)
Fen Line Service Enhancements⁶⁵	Up to 2020	Unknown	Network Rail and Train Operating Company (GoVia)

Timely delivery of the above list of commitments will doubtless serve to stimulate the local economy and enhance the prospects of delivery of planned growth. Whilst the growing recognition of the

⁶⁴ Existing services on the Norwich to London line are operated by Greater Anglia as part of the East Anglia franchise. Services operate every ½ hour (more in peak times) with a journey time of around 1 hour 50 minutes. As part of the recent franchise agreement, services will be upgraded to every 20 minutes; there will be new rolling stock; and some services will have journey times of 90 minutes

⁶⁵ Existing services on the Kings Lynn to London via Cambridge are operated by GoVia as part of the much larger Thameslink, Southern and Great Northern franchise. Currently services from King's Lynn operate every hour to London King's Cross, though they are ½ hourly at peak times. The franchise commitment for GoVia is to run ½ hourly services throughout the whole day from spring 2017, except that, on a maximum of two occasions each day, services can run hourly to allow for freight train usage of the line. For further details of Network rail's King's Lynn-Cambridge 8-car scheme.

need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Further details of some the schemes thought to be necessary in addition to the above commitments are set out in the sections below. These are focussed on certain priority schemes where it is considered that effort in the short term may result in a realistic opportunity to secure funding for delivery in the short to medium term.

Furthermore, the background paper produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited.

It should also be noted that the area of transport is considered to be an area where new technology may have a particularly significant impact during the duration of this framework and this makes predicting the full range of enhancements to travel networks difficult at this stage.

It is clear that providing suitable transport provision to meet the needs of existing and future populations while reducing travel need and impact will be one of the greatest challenges faced by Norfolk in delivering the level of growth that is anticipated over the coming decades. Given the overall scale of growth that is planned across the County a key matter will be ensuring that transport is a significant consideration in locating this growth and development levels are maximised in areas that are best served by transport networks and have the greatest potential for promoting the use of non-car based modes.

Improvements needed

The tables below set out some key shared priority schemes for transportation improvement that the Councils will work together to promote for funding. These projects reflect key infrastructure needed to deliver economic growth in Norfolk and will help to co-ordinate implementation, prioritise activity and respond to funding opportunities. Local Authorities have agreed to these projects being priorities which shall be promoted with focus on further work needed on business cases to promote the schemes for capital funding. It should be noted that in relation to transportation matters there are significant packages of infrastructure investment planned in a number of urban areas (the largest of which is the Norwich Area Transportation Strategy). Each of these could be considered to be strategically significant and unlock considerable housing and economic development potential but are typically better viewed as an amalgam of more localised improvements which will be funded from a variety of sources over many years and so are not included in the lists over the page at this stage.

Table 12: Priority Road Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich North-East Link Road	2017	£29m	Developer funding, Growth Deal, CIL, LIF
A140 Long Stratton Bypass	2019	£30m-£40m	Developer funding, Growth Deal, CIL
A10 West Winch Relief Road	2019	£45m	HCA, developer funding, Growth deal
A47 Hardwick Junction King's Lynn	2019	£25m	HCA, developer funding, Growth deal
Attleborough Link Road	2019	£12m	Developer funding, Pinchpoint bid, Growth Deal
A11 Thetford bypass junctions	2020	Not Known	Pinchpoint bid, Highways England Roads Investment Strategy 2 (2020-2025)
A47 Wisbech Bypass Junctions	2020	Not Known	Pinchpoint bid, Developer funding, Highways England Roads Investment Strategy 2 (2020-2025)
Great Yarmouth Third River Crossing	2021	£140m	Growth Deal, Local Major Transport Scheme, LA
Norwich Western Link (A47 to NDR)	2023	Not Known	Growth Deal, Local Major Transport Scheme
A47 Acle Straight dualling	2025	£120m	Highways England Roads Investment Strategy 2 (2020-2025)
A47 Tilney to East Winch Dualling	2025	£140m	Highways England Roads Investment Strategy 2 (2020-2025)

Table 13: Priority Rail Projects for promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich to London rail (Norwich in 90)	2019-2024	Circa £300 million	Network Rail Control Period 6
Great Yarmouth Rail Station	2019-2024	Not Known	Network Rail Control Period 6
Ely area enhancements	Around 2020	Not Known	Network Rail Control Period 6, Growth Deal 3 (required to fund development work for early (2020) delivery)
Broadland Business Park station	Mid 2020s	£6.5 million	Growth Deal 3
East West Rail (Cambridge to Oxford)	Late 2020s	Not Known	Government via special purpose delivery vehicle

In the consultation on the NSF a number of respondents suggested that the Local Authorities ought to formally agree a high level strategic approach to transport as a formal agreement within the final NSF. Although it has not been possible to produce such an agreement for inclusion in this document further consideration will be given to this matter in 2018 with a view to including such an agreement in future iterations of this document.

7.8 Flood Protection and Green Infrastructure

Flood Protection

Flood protection is a significant issue for Norfolk. Significant parts of the County are vulnerable to tidal, fluvial or surface water flooding from extreme weather events. Such events can pose a significant risk to life as well as property and affect, to a greater or lesser extent, the three main settlements in the County which all developed in their locations due in part to their access to tidal waters.

Much of the Norfolk coastline is reliant on flood defences to minimise flood risk to existing development. Considerable further information on the planned interventions that are necessary in order to protect our communities from coastal flooding are set out in the Coastal Evidence (Flooding and Coastal Erosion) background paper that is published in support of this draft NSF⁶⁶.

UK Government studies have concluded that climate change over the next 100 years is likely to result in hotter, drier summers and warmer, wetter winters, with more extreme weather events including droughts, floods and sea level rise increasing the level of risk from flooding that is faced by communities in Norfolk.

To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from flood plains wherever possible. Developers will need to work closely with the relevant public authorities risk management authorities in minimising flood risk from all sources through a combination of high quality urban design and green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) forming part of the overall design of developments. Early engagement with the relevant risk management authorities is required prior to the submission of some planning applications. Further guidance on how this will be done is available on the County Council website due to its role as the Lead Local Flood Authority for the County⁶⁷.

⁶⁶ See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/Infrastructure%20Group%20Coastal%20Paper%20DRAFT%20V7%201.docx

⁶⁷ See in particular <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf>

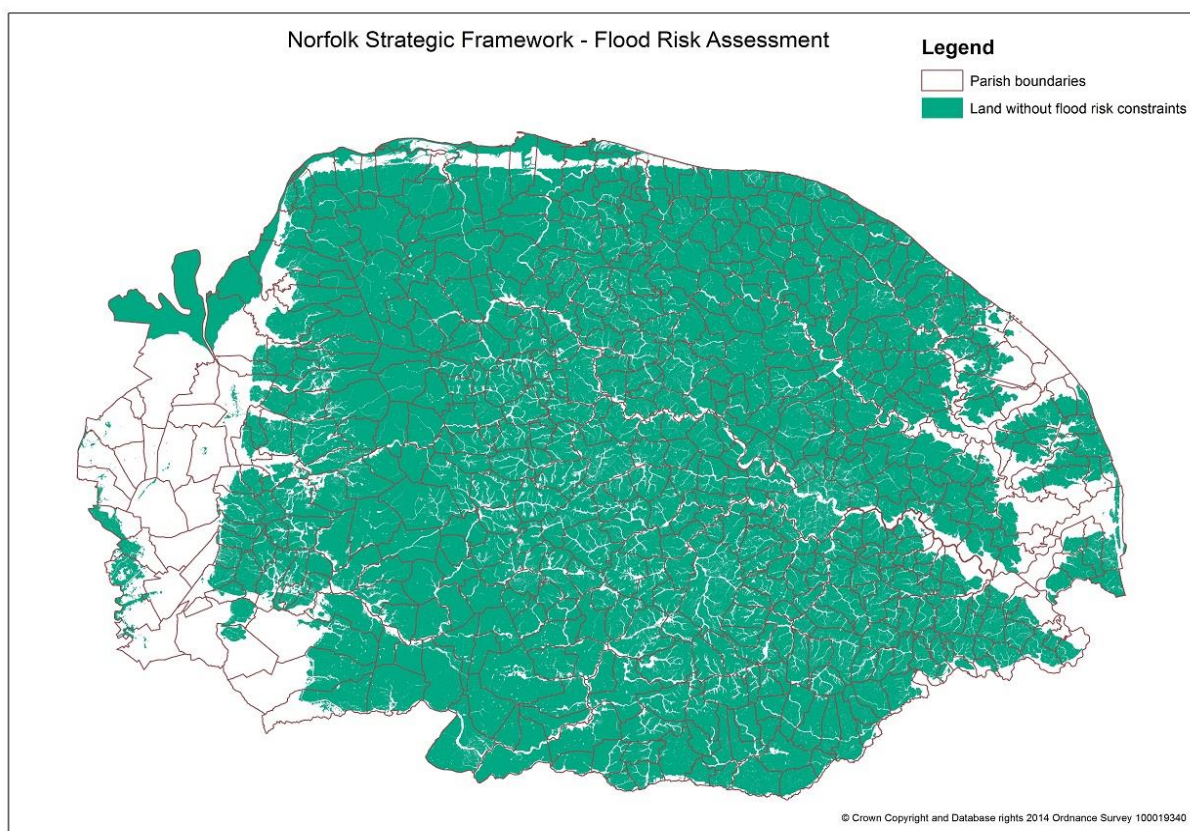


Figure 9: Norfolk Flood Risk Map. 2016

Figure 9 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints. Whilst it is clear that significant areas of the County are free from flood risk constraint it should be noted that many of the currently developed urban areas are at some risk of flooding. It will be important to ensure that a pragmatic approach is taken for new development and flooding as if planned correctly new development can significantly reduce the flood risk faced by existing communities in these areas.

As flood waters do not respect administrative boundaries there will be a need for the Norfolk Planning Authorities to continue to work closely together on assessing and minimising flood risk as well as on responding to emergencies when they do occur. For example, the Broadland Futures Initiative is a strategic project to explore how best to manage flood risk in the inter-related areas of the Norfolk and Suffolk Broads, the coast between Eccles and Winterton (which protects the Northern Broads) and the entrance to the Broads system through Great Yarmouth. The project will guide decision making over the short, medium and long term.

A number of significant investments have recently been made or are planned in the near future to help alleviate flood risk. These are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide IDP.

Table 14: Priority Strategic Flood Defence Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Great Yarmouth Tidal Defences 2017 onwards (Epoch 2)	2026	£27-76 million	LEP, Local Authorities and Local businesses
Bacton Walcott sandscaping scheme	2018	£19.3m	Public sector, Regional Flood and Coast Committee, Environment Agency, Defra, NALEP, private sector

Green Infrastructure and the Environment

Green infrastructure (GI)⁶⁸ is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and work. New GI can also mitigate impacts on existing sensitive sites and support heritage and conserve the historic environment. Access is an integral part of GI and PROW and 'Norfolk Trails' are an important asset.

The area has a wealth of environmental assets ranging from international and national status, to those of local importance. These must be safeguarded and enhanced for the benefit of current and future generations. Many of Norfolk’s natural habitats have been lost and fragmented with once extensive areas of habitats reduced to small remnants isolated from each other and surrounded by relatively inhospitable land uses, reducing biodiversity and increasing vulnerability.

⁶⁸ The definition of GI is set out in the Natural England document GI Guidance (<http://publications.naturalengland.org.uk/file/94026>) In terms of the NSF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.

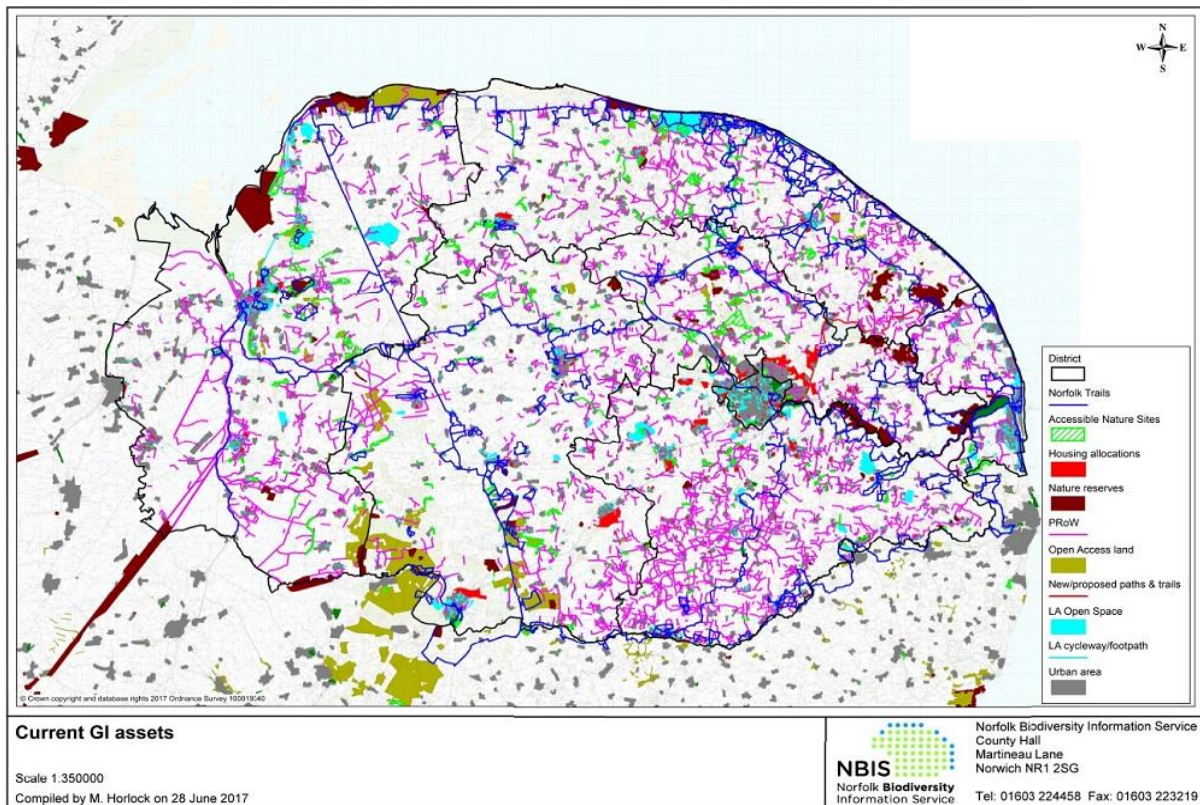


Figure 10: Norfolk's current GI assets. 2017

Current GI assets are set out in Figure 10⁶⁹. Green infrastructure should be provided as an integral part of all new development, where appropriate, alongside other infrastructure such as utilities and transport networks.

Planning for green infrastructure should occur at the evidence gathering (survey and analysis) stage of the planning process, so that green infrastructure responds to character and place, and that standards are set for green infrastructure accessibility, quantity and quality. Early integration of green infrastructure can also ensure that it is properly planned in advance of development or delivered alongside development on a phased basis. In this way green infrastructure can be planned as an integral part of the community. (Natural England Green infrastructure guidance, P43)

As Norfolk grows and changes in terms of its demographic profile considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also:

- Minimising the contributions to climate change and addressing their impact;
- Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value;

⁶⁹ Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>

- Ensuring existing and new residents many of whom may be elderly receive the health and quality of life benefits of good green infrastructure and are able to access appropriate recreational opportunities;
- Maintaining the economic benefits of a high quality environment for tourism; and
- Protecting and maintaining the Wensum, Coast, Brecks and the Broads.

As part of producing this Framework the authorities have commenced work on producing a GI strategy for Norfolk working with the Environment Agency, Natural England and the Norfolk Wildlife trust. This has produced:

- Accessible public open space and Countryside Access maps
- Ecological Network Maps
- Possible Green Infrastructure Corridors throughout the county (the 'GI network')

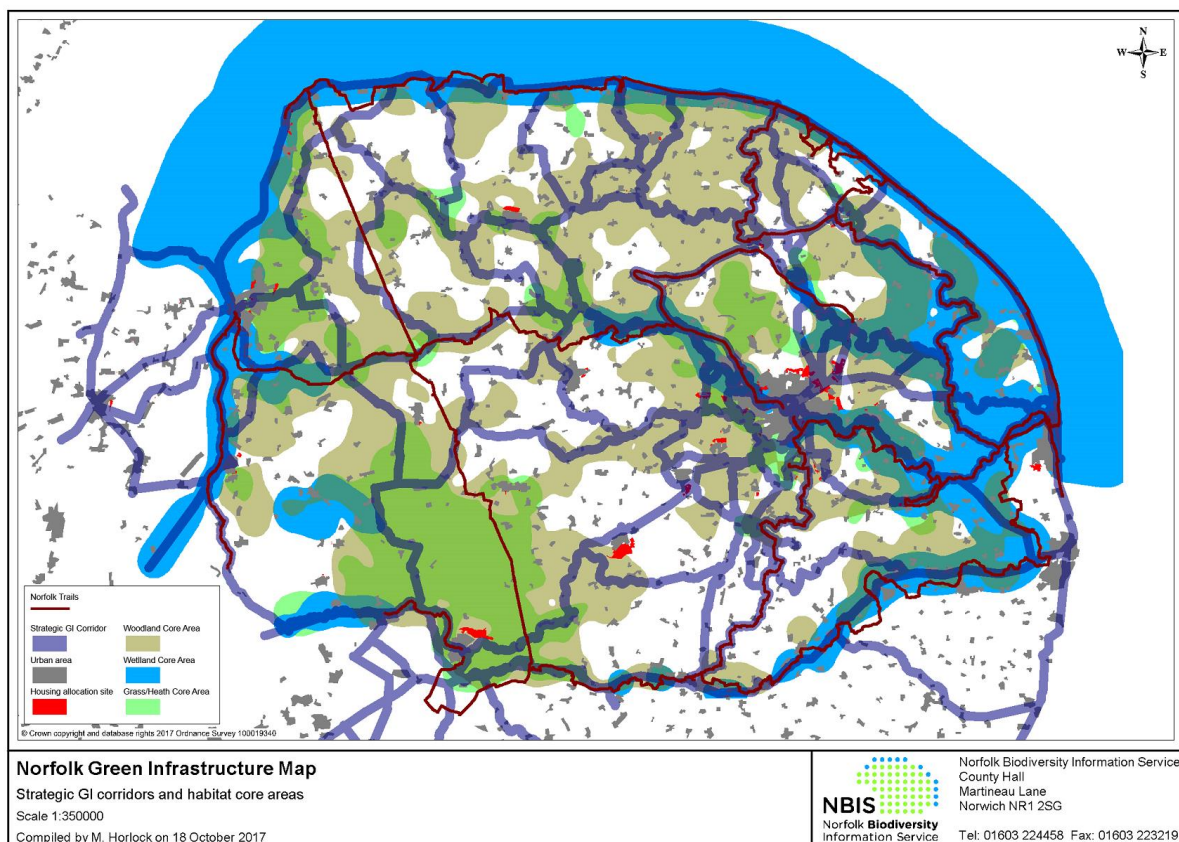


Figure 11: Norfolk's GI corridors. 2017

Figure 11 shows an emerging early draft of the identified potential Green Infrastructure Corridors. The intention is for this map to be further developed over the coming months and be incorporated into the Green Infrastructure Strategy. It should be noted that depending on the nature of corridor they may not constrain development, indeed in some circumstances promoting growth in these corridors may enhance their GI value.

One of the strategic aims for the Environment section is to 'protect, maintain and enhance biodiversity'. New growth in Norfolk must respect this aim, but the use of green infrastructure either existing or new can greatly aid the assimilation of new development. A commissioned report by Footprint Ecology on the impact of recreational pressures on Natura 2000 protected sites likely to

arise from new housing growth gave insights into the scale and location of that pressure. This is a complex area, many of the Natura 2000 sites attract large numbers of visitors, acting as green infrastructure, but are sensitive environments with specific legislative requirements. Mitigation measures and monitoring may be necessary, an action plan prepared by the Norfolk authorities is intended to address this in a co-ordinated way.

Agreement 22: In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;**
- b) the pressure that development in Norfolk could place on these assets; and**
- c) the importance of ecological connections between habitats**

the Local Planning Authorities will work together to produce a GI Strategy for Norfolk in early 2018 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

With regard to the emerging priority projects for short term effort to bring forward, the following are likely to feature within the IDP.

Table 15: Priority Green Infrastructure Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
The Green Loop (Walking/cycling route linking Norwich – Aylsham – Hoveton –NE Growth Triangle)	Not Known	Not Known	
East Norwich Gateway – Yare to Whitlingham Country Park section	2019/20	£1.5m	SusTrans/DfT/Lottery/CIL

Section 8 – Next Steps

With the forthcoming publication of a revised National Planning Policy Framework and a possible requirement to apply a new standardised methodology to assessing housing need and produce statements of common ground it is clear that Norfolk's local authorities will continue to need to work closely together to address strategic planning matters. Furthermore, it is also clear that in addition to keeping the NSF itself under review there will need to be some consideration of whether the NSF remains the most appropriate vehicle to address strategic planning matters or whether more formalised statements of common ground or seeking to move towards the production of some form of statutory strategic plan would better serve the County.

Decisions on such matters will be taken during the first half of 2018 alongside the following activities:

Reviewing and updating the NSF:

- Update the NSF in light of the publication of the new NPPF scheduled for Spring 2018
- Enhancing areas of the NSF where time and resource has limited progress and where highlighted through the public consultation - such as follow up work on delivery issues, enhancing the economic chapter, including a transport agreement and further work around how elderly housing could be delivered.
- Once all Housing and Economic Land Availability Assessments are complete work with authorities, where required, where not all housing needs can be met
- Ensure NSF aligns to LEP Economic Strategy
- Monitoring NSF and maintain links to other authorities

Coordinate Joint planning activities:

- Build on the NSF and support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Production of statements of co-operation to inform Local Plan examinations;
- Production of statement of common ground
- Reviewing of Objectively Assessed Need for housing in light new government methodology
- Support of Local Plan Process
- Jointly commission evidence for local plans to create savings over commissioning evidence separately.
- Coordinate responses to consultations etc.
- Look to complete and maintain some policy work across the county eg OAN methodology, Brownfield register, production of common policies

In order to allow this work to proceed the Norfolk Authorities have agreed to the following:

Agreement 23: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the signatories to this document agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Appendix 1 – NSF Contacts:

Please direct all representations relating to the NSF to the NSF Project as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

NSF Project Manager	
Trevor Wiggett City Hall St Peter's Street Norwich NR2 1NH Email: trevorwiggett@norwich.gov.uk 01603 212557	
Breckland Council	Broadland District Council
Phil Mileham Strategic Planning Manager Breckland Council and South Holland Council Elizabeth House Walpole Loke Dereham NR19 1EE Tel 01362 656803 Email : phil.mileham@breckland-sholland.gov.uk	John Walchester Spatial Planning Manager Broadland District Council Thorpe Lodge 1 Yarmouth Road Norwich NR70DU Tel 01603 430622 Email : john.walchester@broadland.gov.uk
The Broads Authority	Great Yarmouth Borough Council
Natalie Beal Planning Policy Officer Broads Authority Yare House 62-64 Thorpe Road Norwich NR1 1RY Tel 01603 756050 Email : Natalie.Beal@broads-authority.gov.uk	John Clements Principal Strategic Planner Great Yarmouth Borough Council 2nd Floor, Town Hall Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493 846624 Email: john.clements@great-yarmouth.gov.uk
The Borough Council of King's Lynn and West Norfolk	Norfolk County Council
Alan Gomm Planning Policy Manager Borough Council of King's Lynn and West Norfolk Kings Court Chapel Street King's Lynn PE30 1EX Tel 01553 616237 Email : alan.gomm@west-norfolk.gov.uk	Phil Morris Principal Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 222730 Email : phil.morris@norfolk.gov.uk

<p>North Norfolk District Council</p> <p>Mark Ashwell Planning Policy Manager North Norfolk District Council Council Offices Holt Road Cromer NR27 9EN</p> <p>Mail : mark.ashwell@north-norfolk.gov.uk Tel 01263 516325</p>	<p>Norwich City Council</p> <p>Graham Nelson Head of Planning City Hall St Peter's Street Norwich NR2 1NH</p> <p>Mail : grahamnelson@norwich.gov.uk Tel 01603 212530</p>
<p>South Norfolk Council</p> <p>Simon Marjoram Planning Policy South Norfolk District Council South Norfolk House Long Stratton Cygnet Court Norwich NR15 2XE Tel 01508 533810 Email : SMarjoram@S-NORFOLK.GOV.UK</p>	

Brownfield Land Register Update

Summary: This report provides an update to progress on the preparation and publication of the Brownfield Land Register.

Recommendations: **That the progress is noted and to agree to the recommended approach not to undertake Part 2 of the register at this time.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Sarah Tudhope, 01263 516011 sarah.tudhope@north-norfolk.gov.uk	

1. Introduction

- 1.1 The Town and Country Planning (Brownfield Land Register) Regulations 2017 (BLRR) came into force on the 16 April 2017 placing a new duty on local planning authorities (LPAs) to prepare, maintain and publish a register of previously developed land (brownfield land) that is suitable for residential development. The register was required to be published by 31 December 2017.
- 1.2 The register must be kept in two parts. The Department for Communities and Local Government (DCLG) have published a prescribed format that all local authorities must use to publish their data.
- 1.3 The first part of the register is the list of suitable brownfield land sites and the second part (which is a sub-set of Part 1 and in reality is only identified by certain other fields within the register containing information) is for those entries in Part 1 that the authority considers are suitable for 'permission in principle'¹. Part 2 of the register is discretionary.

2. The Register

- 2.1 The North Norfolk Brownfield Land Register (BLR) has been prepared in accordance with the regulations and was published on the Council's website² on the 22 December 2017. Seven sites have been identified for inclusion in Part 1 of the register, consisting of 5 sites with existing planning permission (either full or outline) and 2 sites without. No sites are currently proposed for a grant of permission in principle at this stage.
- 2.2 The Government has advised that local authorities should use existing processes to identify sites for inclusion in brownfield land registers. The main

¹ See The Town & Country Planning (Permission in Principle) Order 2017 and the National Planning Practice Guidance 'Permission in Principle' - <https://www.gov.uk/guidance/permission-in-principle>

² See https://www.north-norfolk.gov.uk/media/3783/northnorfolk_brownfieldregister_2017-12-19_rev1.csv

source of sites for consideration for the BLR has been the Council's Housing and Economic Land Availability Assessment (HELAA) which includes, but is not limited to, details of unimplemented planning permissions, allocated sites which are unimplemented, sites put forward through a 'call for sites' (18th January 2016 and 31st May 2016) and land in local authority ownership.

- 2.3 Sites that appear on the register must be appropriate for housing development (or housing led development), irrespective of their planning status, having regard to the criteria³ set out in [regulation 4](#) of the BLRR. Local authorities are also required to have regard to the development plan, including relevant neighbourhood plans, and the National Planning Policy Framework when making decisions about which sites to include on their registers. This means for example that a site that complies with the definition of brownfield land but is located within an area designated as countryside in the development plan would **not** appear on the register.
- 2.4 Approximately 330 sites were identified within the towns and service villages for further consideration. The list was then reduced by removing those sites that did not meet the definition of previously developed land, those sites that were less than 0.25ha and / or do not support at least 5 dwellings, and those sites that did not meet the definitions of suitable, available or achievable as set out in the regulations. The result of this process was the 7 sites which have been entered into the register (See **Appendix 2**). These sites amount to approximately 4.39 hectares of brownfield land with an estimated net minimum number of dwellings totalling 118.
- 2.5 In addition to the 7 sites that have been entered into the register there were, at the time of preparing the register (December 2017), 87 other brownfield land sites with extant permissions for, or including, housing development identified within the selected settlements. These do not appear on the register. This is because they are either already under construction, are not considered to be available (despite having permission), may be part greenfield land or mainly because they fall below the size and/or number of dwellings thresholds for entry in the register. These sites amount to a further 5.4 hectares of brownfield land with extant consent for 215 dwellings.
- 2.6 As Part 2 of the register is discretionary, inclusion of a site in Part 1 does not mean that it will automatically be granted permission in principle. The regulations set out the requirements for publicity and consultation where an authority proposes to enter sites on Part 2 of the register. There is no right of appeal where a LPA decides not to enter a site in Part 2 of the register and not trigger the grant of permission in principle. A person with an interest in a site has the option of submitting a planning application to the LPA in the usual manner.
- 2.7 Permission in principle is an additional tool that the Government has created and it must be carefully considered whether it is beneficial to use it, and if so where. The inclusion of sites on Part 2 of the register is at the Council's

³ The criteria referred to in paragraph (1)(b) of regulation 3 (BLRR) are, in relation to each parcel of land—

(a) the land has an area of at least 0.25 hectares or is capable of supporting at least 5 dwellings;

(b) the land is suitable for residential development;

(c) the land is available for residential development; and

(d) residential development of the land is achievable.

discretion and requires a clear, transparent and consistent approach. The regulations stipulate very precisely what matters can be taken into account when granting permission in principle, and which matters cannot. Crucially, unlike normal planning applications it would usually fall to the Council, and not the developer, to undertake any technical surveys necessary to confirm that a site is suitable and developable. Additional guidance from the Government on the practical steps required to create the new consent is anticipated.

- 2.8 At this moment in time it is considered that there would be very limited gains resulting from establishing and undertaking the process required for sites to be included on Part 2 of the register. Granting of permission in principle would be unlikely to lead to any significant increase in the number dwellings coming forward on brownfield land in the district. It is therefore considered that the resource implications (staff and financial) far outweigh any advantages of undertaking the process of granting sites in the register permission in principle.
- 2.9 Taking into account the above issues it is proposed that the Council does not progress with Part 2 of the register at the current time. This approach is in common with many other planning authorities establishing brownfield land registers for the first time. This situation will be kept under review alongside the required annual review of the entries in the register.

3. Recommendation

- 3.1 That the progress is noted and to agree to the recommended approach not to undertake Part 2 of the register.

4. Legal Implications and Risks

- 4.1 It is a legal requirement to prepare, maintain and publish a register. The register (Part 1) must be in place by 31 December 2017. It is considered that the duty to prepare and publish a register by 31 December 2017 has been met.

5. Financial Implications and Risks

- 5.1 A new burdens grant payment of £14,645 for 2016/17 has been received by the Council and further grant payments for 2017/18, 2018/19 and 2019/20 have been announced with the amount of funding from 2016/17 onwards being kept under review.
- 5.2 The brownfield land register must be reviewed at least once a year and therefore the process requires an ongoing officer commitment.

Appendix 2

Abbreviations

BLRR - The Town and Country Planning (Brownfield Land Register) Regulations 2017

LPAs - local planning authorities (LPA – local planning authority)

DCLG - Department for Communities and Local Government

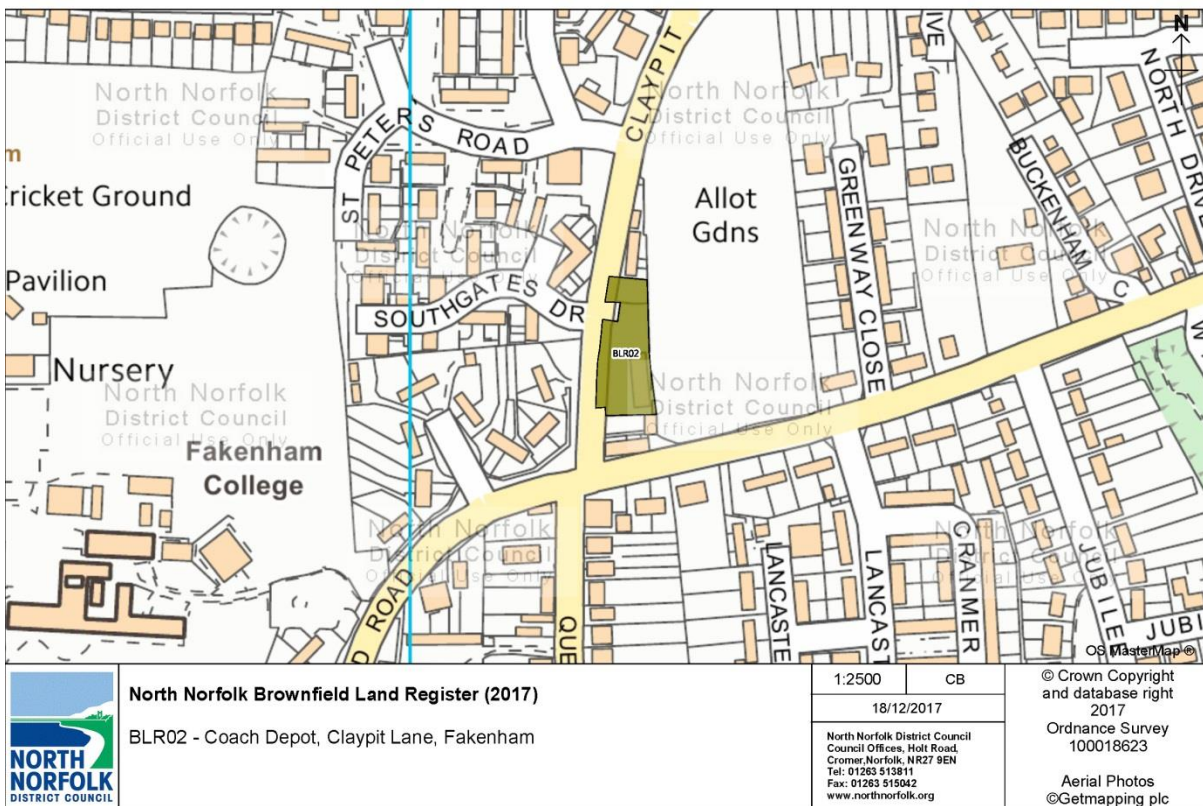
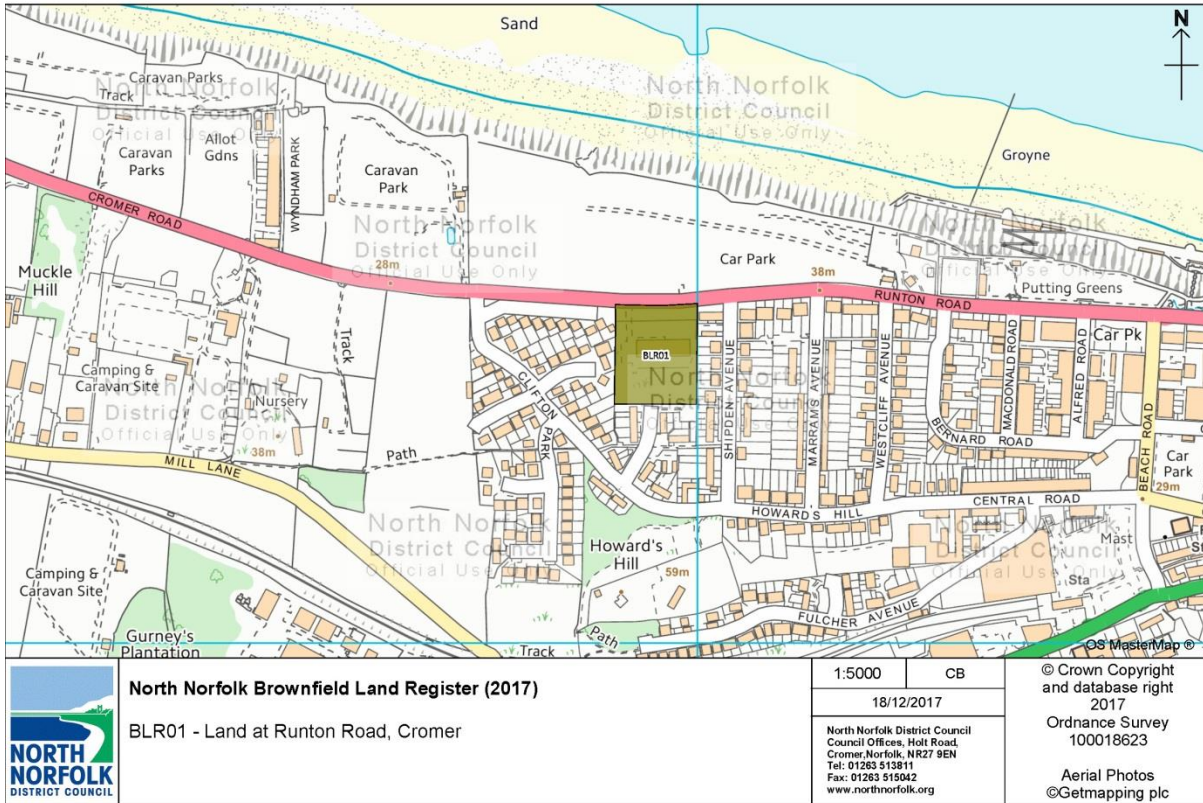
BLR - North Norfolk Brownfield Land Register

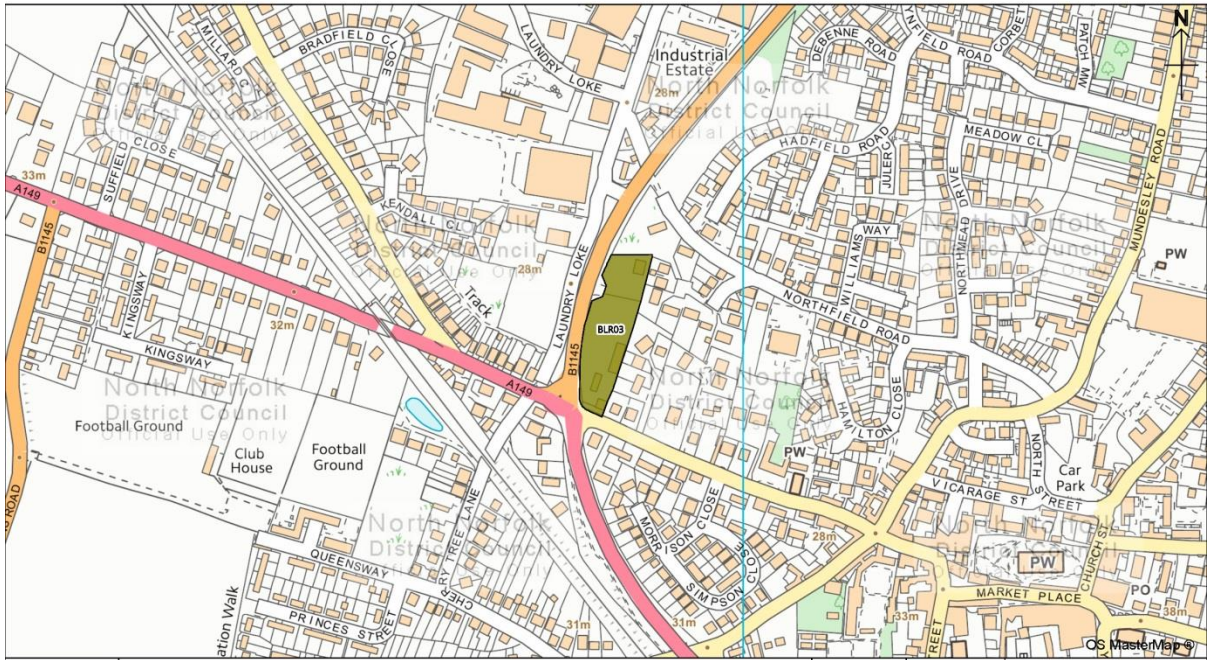
HELAA - Housing and Economic Land Availability Assessment

Brownfield Land Register Update

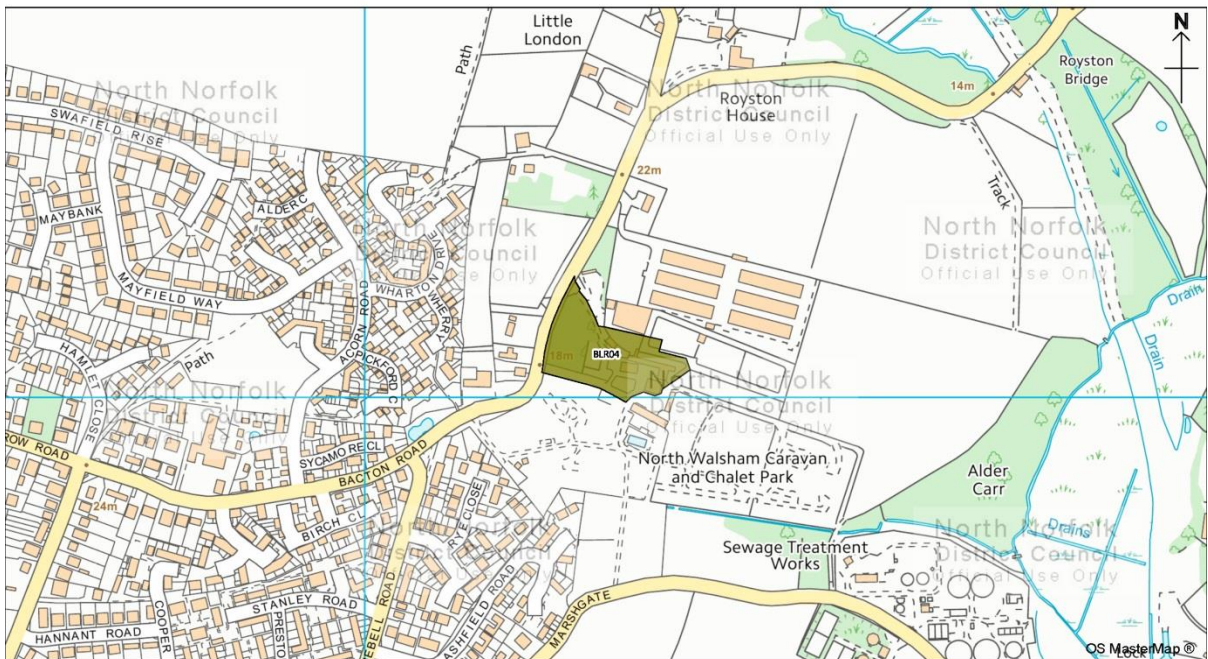
Appendix 2

BLR Reference No.	Address	Planning Permission Type/Reference	Source	Description
BLR01	Land at Runtun Road, Cromer	None	Call for sites	Estimated capable of accommodating between 25-29 dwellings
BLR02	Coach Depot, Claypit Lane, Fakenham	Full permission 13/0995	Outstanding permissions	Full permission for 7 dwellings. Expires 27/09/18
BLR03	Maces Yard, 34-36 Cromer Road, North Walsham	None	Call for sites	Estimated capable of accommodating between 20-23 dwellings
BLR04	Melbourne House, Bacton Road, North Walsham	Full permission 17/0756	Outstanding permissions	Change of use/conversion of main house to one dwelling and three flats and the conversion of outbuildings/barn to five dwellings
BLR05	29 New Road, North Walsham	Full permission 17/0579	Outstanding permissions	Demolition of existing buildings and erection of 45 retirement living apartments for the elderly including communal facilities, landscaping, car parking and ancillary development
BLR06	Land at Abbey Road, Sheringham	Full permissions PM/02/0556 – extant 15/1468 (one dwelling expires 09/03/19) 14/0143 (two dwellings expires 29/05/19) 13/0815 (two dwellings expires 22/10/18) 13/0345 (one dwelling expires 31/05/18)	Outstanding permissions	The wider site has extant permission (PM/02/0556) for 6 bungalows. There are currently 4 permissions for revised designs replacing the bungalows with one and a half, two and two and a half storey dwellings.
BLR07	Coach Depot, The Street, Catfield	Outline permission 16/0875	Outstanding permissions	Erection of 7 dwellings (details of appearance and landscaping reserved)

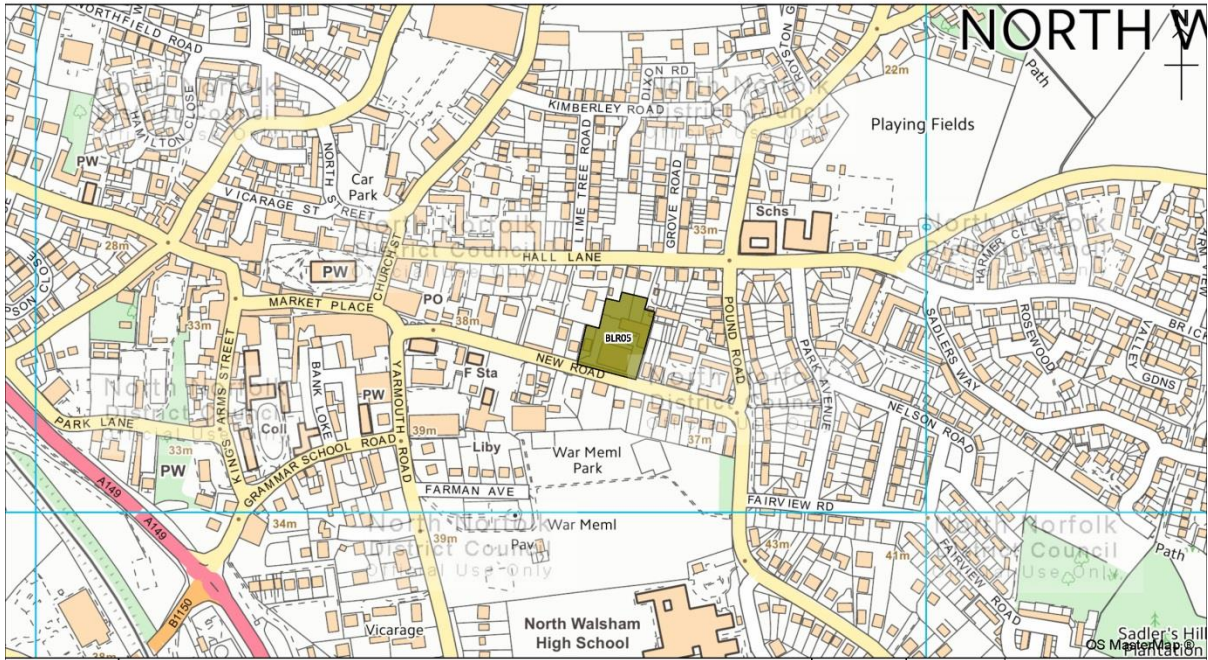





	North Norfolk Brownfield Land Register (2017) BLR03 - Maces Yard, 34 - 36 Cromer Road, North Walsham	1:5000	CB	© Crown Copyright and database right 2017 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc
		18/12/2017		




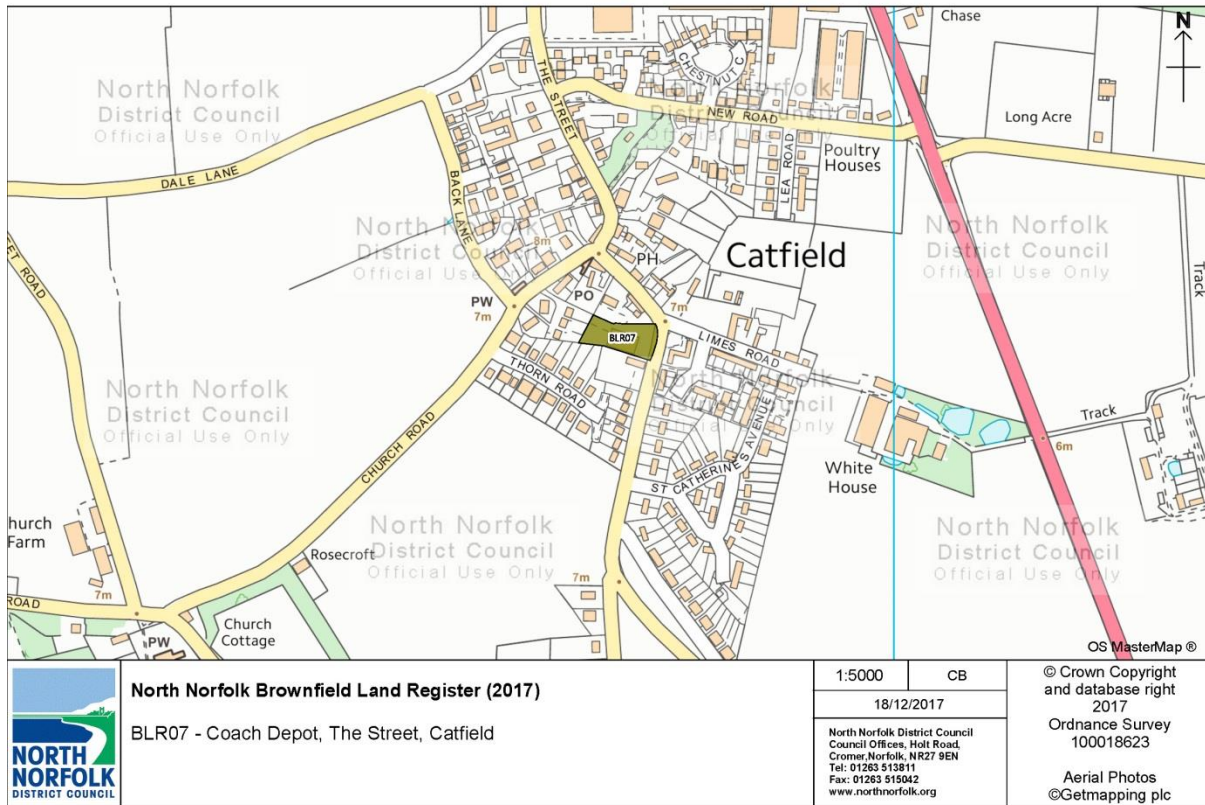
	North Norfolk Brownfield Land Register (2017) BLR04 - Melborne House, Bacton Road, North Walsham	1:5000	CB	© Crown Copyright and database right 2017 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc
		18/12/2017		



	North Norfolk Brownfield Land Register (2017) BLR05 - 29 New Road, North Walsham	1:5000	CB	© Crown Copyright and database right 2017 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc
		18/12/2017		



	North Norfolk Brownfield Land Register (2017) BLR06 - Land at Abbey Road Sheringham	1:5000	CB	© Crown Copyright and database right 2017 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc
		18/12/2017		



The sites total 4.39 hectares of brownfield land with an estimated net minimum number of dwellings totalling 118.

At the time of preparing the register (December 2017) there were 87 brownfield sites with extant permissions for, or including, housing development which officers identified within the selected settlements, which do not appear on the register. This is because they are either already under construction, are not considered to be available (despite having permission), may be part greenfield land or they fall below the size and/or number of dwellings thresholds for entry in the register. These sites amount to a further 5.4 hectares of brownfield land with extant consent for 215 dwellings.

Holt Neighbourhood Plan Pre Submission Consultation.

Summary: The report provides an update on the consultation version of the Holt Neighbourhood Plan and officers’ response.

- Recommendations to Cabinet:**
- 1. That the Council welcomes and supports the progress that has been made.**
 - 2. That Appendix 4 is agreed as the basis for this Council’s response to the consultation.**

Cabinet Members(s)	Ward(s) Affected
All Members	Holt
Contact Officer(s), telephone number and email: Iain Withington (Planning Policy Team leader) 01263 516034	

- 1.1 Holt Town council have published their emerging neighbourhood plan for consultation. This is a pre submission consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations. The consultation is publicised to run for six weeks between Thursday 11th January 2018 and closes on Friday 23rd February 2018.
- 1.2 The Holt pre submission neighbourhood plan, HNP is available to view as [Appendix 3](#) or on the town council’s web site: <http://www.holttowncouncil.org/council-info/neighbourhood-plan/>
- 1.3 This is the first formal consultation on the emerging neighbourhood plan which once “made” will form part of the statutory Development Plan. In this first stage of consultation officers have made broad comments on the overall content of the emerging plan, provided detailed professional advice designed to assist the neighbourhood plan steering group in tailoring the policies to align with the requirements of the legislation, meeting the Basic Conditions tests and sit alongside the existing Development Plan (and also prolong its

effective life to accord with the emerging Local Plan), reducing the risk of further amendments by the appointed independent examiner at the examination stage.

- 1.4 Following this consultation the Neighbourhood Plan group are required to reflect on the comments received, both from the Council and other consultees, and submit a revised plan (where revision is necessary) to the Council for checking against the regulatory requirements. Once the council is satisfied that these tests have been met the proposed Neighbourhood Plan and required supporting documentation is put forward for a further consultation and then examination and the Inspector checks compliance with the “Basic Conditions”. Following the incorporation of any amendments required the then proposed plan should progress to local referendum.
- 1.5 Comments are made on a number of policies, highlighting that there may not be adequate evidence / justification, potential conformity issues and duplication with the Development Plan process. This is something that is often picked up on by neighbourhood plan examiners, resulting in substantial amendments being required by them in order for the proposed plan to move forward to any referendum. Neighbourhood plans are not freestanding documents and are required to be developed in line with the Local Plan and strategic policies, underpinned with evidence so that they complement the existing policies by being in general conformity with the existing Development Plan, and where necessary add more local distinction and specific local policies provided they are justified by evidence. Only plans and policies that meet the legislative tests can go on and form part of the Development Plan for the District.
- 1.6 The consultation version of the HNP currently covers many general aspects of policy, in many places on the surface it does not seem to bring additional locally specific decision making criteria / policies to the table and repeats the thrust of many existing Development Plan policies, rather than focussing on specific added value opportunities.
- 1.7 As part of the Council’s support for neighbourhood planning a number of guidance documents including the identification of strategic and non-strategic policies & check sheets have been produced. These are available on the Council’s web site and it is recommended that these are reviewed as part of the next iteration of the HNP. It also suggested that the steering group would benefit from the offer of an informal review of policies and supporting evidence / justification of approach ahead of any submission NP.
- 1.8 The Government’s National Planning Practice Guidance – Neighbourhood Planning sets out the requirements for policies in Neighbourhood Plans. This includes: “How should the policies in a neighbourhood plan be drafted?”

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by

appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.

Paragraph: 041 Reference ID: 41-041-20140306”

And

“General conformity with the strategic policies contained in the Development Plan

What is meant by ‘general conformity’?

When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, 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 or Order and the evidence to justify that approach.*

Paragraph: 074 Reference ID: 41-074-20140306.”

The PPG states that a neighbourhood plan should support the strategic development needs set out in the Local Plan and plan positively to support local development as outlined in para 16 of the NPPF .

neighbourhoods should:

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; NPPF, 2012 para 16.*

- 1.9 It is recommended that the policies referred to are reassessed and amended to comply with the Planning Practice Guidance, PPG (e.g. they provide “an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that initial policy”) or that they are deleted, or that additional evidence / justification is provided. This additional evidence will be required to assist HNP in justifying its approach through the required Basic Conditions Statement at submission stage and examination.

In some circumstances it may be appropriate to change the particular policy to supporting explanatory text, or aspirational text.

- 1.10 In order to remain effective and useful in the determination of applications it is recommended that policies are worded so that they can be applied in a mindful way and should contain an operative clause (justified & evidenced). A failure to make the policy specific to a particular requirement will render it ineffective. If a number of policies remain this way collectively there is the potential to make the whole plan ineffective. Any repetition of national and local policies should be removed.
- 1.11 Concerns are raised around the robustness of the undertaking of the Strategic Environmental Assessment, SEA.
- 1.12 A detailed schedule of comments is attached in **Appendix 4**

2. Legal Implications and Risks.

- 2.1 Once made the Neighbourhood Plan will form part of the Development Plan for the District and will be used in part in the determination of planning applications in the Neighbourhood Planning Area. It is important that in its making of comments on the emerging plan that the Council not only provide supporting advice but also fulfil its duty in advising on the requirements of legislation and planning policy.
- 2.2 Neighbourhood Plans that do not meet the Basic Condition tests may fail at examination.

3 Financial Implications and Risks.

The HNP has been produced by a steering group of the Town Council; the risks of production are therefore theirs. The Council has supported the group financially and provided advice. For the next stages which include a further consultation, an examination and a referendum of any proposed neighbourhood plan, the Council is responsible for undertaking and financing these stages. Before the plan can proceed to such stages the Council however must satisfy itself that the required documents have been provided, are in the correct format and contain the level of detail to enable publication, public participation and examination.

4 Recommendations

- 1. That the Council welcomes and supports the progress that has been made.**
- 2. That Appendix 4 is agreed as the basis for this Council's response to the consultation.**

Appendix 3: Pre Submission Neighbourhood Plan (online)

Appendix 4: Schedule of Comments

Abbreviations

HNP - Holt Pre Submission Neighbourhood Plan

NP - Neighbourhood Plan

PPG – Planning Practice Guidance

Holt Neighbourhood Plan

Pre-submission consultation 11 January – 23 February 2018

Thank you for the opportunity to comment on the emerging Holt Neighbourhood Plan (HNP) during the formal pre submission consultation. The comments below and the attached schedule forms Officers formal comments on the emerging HNP at Regulation 14 stage of the Neighbourhood Planning (General) Regulations 2012 as amended.

General Comments

Comments are made on a number of policies, highlighting that there may not be adequate evidence / justification; potential conformity issues and duplication with the Development Plan process. This is something that is often picked up on by neighbourhood plan examiners, resulting in substantial amendments being required by them in order for the proposed plan to move forward to any referendum. Neighbourhood plans are not freestanding documents and are required to be developed in line with the Local Plan and strategic policies, underpinned with evidence so that they complement the existing policies by being in general conformity with the existing Development Plan, and where necessary add more local distinction. Only plans and policies that meet the legislative tests can go on and form part of the Development Plan for the district. The HNP currently covers many general aspects of policy, in many places on the surface does not seem to bring additional locally specific decision making criteria / policies to the table and repeats the thrust of many existing Development Plan policies, rather than being focused on specific added value opportunities.

The Development Plan consists of: the adopted Core Strategy, the Site allocations Development Plan Document (DPD), and the Proposals Map. Of material consideration are the Design Guide Supplementary Planning Document (SPD) and the Landscape Character Assessment SPD. Consideration needs to also be given to the emerging Local Plan and the refreshed evidence across a number of detailed evidence areas. As part of the Council's support for neighbourhood planning a number of guidance documents, including the identification of strategic and non-strategic policies, check sheets have been produced. These are available on the Council's web site and it is recommended that these are reviewed as part of the next iteration of the HNP. The Council would encourage you to take up its offer of an informal review of policies and supporting evidence / justification of approach, after this consultation and ahead of any final submission. This would provide advance comments on whether the emerging policies are likely to meet the basic conditions tests and could take the form of offering alternative wording to make a policy stronger and or to align with the emerging Local Plan in order to extend the HNP effectiveness. A copy of the guidance is available at:

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

The Government's National Planning Practice Guidance (PPG) – Neighbourhood Planning sets out the requirements for policies in Neighbourhood Plans. This includes:

“How should the policies in a neighbourhood plan be drafted?”

A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when

determining planning applications. It should be concise, precise and ***supported by appropriate evidence***. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.

Paragraph: 041 Reference ID: 41-041-20140306”

And

“General conformity with the strategic policies contained in the Development Plan

What is meant by ‘general conformity’?

When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, 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 or Order and the evidence to justify that approach*

Paragraph: 074 Reference ID: 41-074-20140306.”

The PPG states that a neighbourhood plan should support the strategic development needs set out in the Local Plan and should plan positively to support local development as outlined in para 16 of the National Planning Policy Framework (NPPF) .

Neighbourhoods should:

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;*

NPPF, 2012 para 16,

Comments are detailed in the schedule below to reflect this guidance and the legislative requirements in order to aid the HNP group in policy development and to refine the plan so that it has the greatest opportunity of meeting the Basic Condition tests and to sit alongside the existing Development Plan (and also prolong its effective life to accord with the emerging Local Plan), with the aim of reducing the risk of further amendments being required by the appointed independent examiner.

A number of policies refer to complying with the requirements of and policies of the HNP and the Development Plan etc. This seems superfluous in all cases, as determination of any planning

application must be in accordance with the Development Plan unless material considerations indicate otherwise. This is enshrined in national policy

It is recommended that the policies referred to are reassessed and amended to comply with the PPG (e.g. they provide “an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that initial policy”) or that they are deleted, or that additional evidence / justification is provided. This additional evidence will be required to assist HNP in justifying its approach through the required Basic Conditions Statement at submission stage and examination. In some circumstances it may be appropriate to change a particular policy to supporting explanatory text, or aspirational text.

In order to remain effective and useful in the determination of applications it is recommended that policies are worded so that they can be applied in a mindful way and should contain an operative clause (justified & evidenced). A failure to make a policy specific to a particular requirement will render it ineffective. If a number of policies remain this way collectively there is the potential to make the whole plan ineffective. Any repetition of national and local policies should be removed.

Following this Regulation 14 consultation there is an opportunity for the Neighbourhood Plan group to review and adjust the plan and the opportunity to document specific evidence before submission to the Council under Regulations 15 & 16. It is at this stage that the Council will review the Draft Neighbourhood Plan and submission documentation for conformity to the entire legal framework.

Concerns are raised around the robustness of the undertaking of the Strategic Environmental Assessment, SEA. We have previously advised that the Council will undertake this exercise on behalf of the group and this would reduce the risk at examination. Once the policies have been revised as a result of this consultation we would be pleased to undertake this exercise for you so that the HNP can be satisfied that this part of basic conditions is addressed ahead of examination. Further detailed commentary is included in the schedule below.

The advice contained in the schedule is compiled from across the authority and varying specialist departments. We trust that these comments are helpful and constructive. Should you wish to discuss any issues or require further explanations please contact a member of the policy team.

Schedule of Comments

Ref. No.	Page and Policy/ Paragraph No	Comment
1	General	In addition to the general comments made above comments are made on a number of policies, highlighting that there may not be adequate evidence / justification or that they duplicate other Development Plan policies. This is something that is often picked up on by Neighbourhood Plan Examiners, with substantial amendments made by them to the proposed Neighbourhood Plan. <u>Neighbourhood plans are not freestanding documents</u> and are required to be developed in line with the Local Plan and strategic policies, underpinned with evidence. The Government’s national Planning Practice Guidance (PPG) – Neighbourhood Planning sets out the requirements for policies in Neighbourhood Plans. This includes:

		<p>“How should the policies in a neighbourhood plan be drafted?</p> <p>A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</p> <p>Paragraph: 041 Reference ID: 41-041-20140306”</p> <p><i>And</i></p> <p>“General conformity with the strategic policies contained in the Development Plan</p> <p><i>What is meant by ‘general conformity’?</i></p> <p>When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:</p> <ul style="list-style-type: none"> • 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 or Order and the evidence to justify that approach <p>Paragraph: 074 Reference ID: 41-074-20140306.”</p> <p>Therefore, it is recommended that the policies referred to are reassessed and amended to comply with the PPG (e.g. they provide “an additional level of detail and /or a distinct local approach to that set out in the strategic policy without undermining that policy”) or that they are deleted, or that additional evidence / justification is provided. In some circumstances it may be appropriate to change the particular policy to supporting explanatory text.</p>
2	General	<p>Despite the supporting text implying otherwise, many of the policies are high level repetitions of national policy and or existing Development Plan policies. It would therefore be reasonable to expect that any additional policy included in the HNP would be to add a flavour of local distinctiveness rather than repetition of existing policies. To make the HNP distinctive and to be effective in the determination of planning applications many of the policies should be revised to give the document more of a bespoke feel and local purpose, adding detail to the Development Plan rather than duplicating its generality. More detail on these issues is provided in the specific policy comments below.</p>

3	General	A number of policies refer to complying with the requirements of and policies of the HNP and Development Plan. This is superfluous in all cases as determination of any planning application must be in accordance with the Development Plan unless material considerations indicate otherwise. This is enshrined in national policy and it is likely that any inspector will remove this reference from all policies across the plan.
4	General	It is recognised that it remains important to the NP group to reflect community aspirations however guidance is clear that Neighbourhood Plans do not seek to duplicate existing statutory and non-statutory policies or seek to introduce non land use planning matters. The Council advises that areas of duplication should be reviewed and removed prior to final submission.
5	General	<p>Before including policies on aspirations <u>first</u> it should be checked if there is an appropriate policy response in the Development Plan - this includes national policy approach as well as local policies as detailed above - and <u>secondly</u> that any aspiration is subsequently supported by evidence. Inspectors are increasingly commenting on the lack of evidence to support policy development and such approaches run an increased risk of alteration and deletion by the inspector. To aid in shaping the HNP it is recommended that some of the more recent Norfolk NP examination reports are reviewed.</p> <p>Detailed guidance on this is contained in the PPG published online by DCLG. This builds on the national policy approach outlined throughout the NPPF and in particular Para. 16 which states: neighbourhoods should:</p> <ul style="list-style-type: none"> ● <i>develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</i> ● <i>plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan;</i>
6	General	In order to remain effective and useful in the determination of applications it is recommended that policies are worded so that they can be applied in a mindful way and should contain an operative clause which should be justified and evidenced. A failure to make a policy specific to a particular requirement will render it ineffective. If a number of policies remain this way collectively there is the potential to make the whole plan ineffective. Any repetition of national and local policies should be removed. Ineffectively constructed policies will be difficult to apply and run the risk of deletion by the inspector.
7	General	<p>Conformity – throughout the plan there are references to the Core Strategy, Local Plan and Development Plan of the district. The neighbourhood plan is being brought forward ahead of the emerging new Local Plan and although the dates roughly align, in order to future proof the NP it is recommended that text is amended throughout the document and in places within specific policies so that the reference is made not only to the Core Strategy but to its subsequent revision (the emerging Local Plan) or simply refer to the Development Plan.</p> <p>To avoid the risk of policies in a NP being superseded by a later Local Plan it is necessary for the two plans to work in a complementary way. In general the emerging Neighbourhood Plan talks about the Local Plan policies contributing to support the NP policies. However, as detailed in the national guidance it is the NP policies that need to align with the Local Plan. It is the NP policies that</p>

		can bring specific local approaches and detail. Suggest that this is clarified in future iterations of the NP to avoid any misrepresentation and to provide a fuller understanding to the local community.
8	General	As above the NP should reference the 'emerging Local Plan' as well as the adopted Core Strategy / Development Plan. The HNP is being brought forward in advance of the emerging Local Plan and due to this timing there is an increased element of risk. It is the emerging Local Plan that will set the growth targets and strategic direction for the lifetime of the neighbourhood plan.
9	General	Supporting evidence – A NP is required to be 'justified and evidenced'. Although some evidence on local social, economic and environmental conditions and issues is included in the consultation document these are not referenced and no specific evidence based document has been made available on the HTC web site. <u>It is best practice to make all the evidence based documents available for public consultation / reference.</u> Plans should be informed by the most up-to-date information. It is considered that large parts of the evidence base developed for the emerging Local Plan is also likely to form part of the evidence base of the neighbourhood plan. As a minimum this evidence base – provided that it has been used - should be referenced and made available on the HTC website along with all the background information / feedback received from any previous consultation. This includes the SA Scoping document which is not available on the web site but was consulted on in the autumn of 2017. In addition the feedback given from all parties in respect of the SA Scoping report should also be publically available.
10	Images – General Point	Several of the maps are blurred and/or stretched. These should be formatted correctly and a scale applied. It may be that they have been copied from published documents rather than the source map requested or reproduced. If re-published the appropriate permissions should be obtained. The map detailing one of the conservation areas that cover the NPA is incorrect and based on out of date information. Specifically this will need to be replaced to reflect the true and most recent extent of the conservation area. If not the map and or policy could be deleted by the inspector as not being founded on the most up to date information and evidence.
11	General	The format of the document is in places misleading and additional clarifying text should be added. For example, the site allocation section, although factually true, i.e. the sites have been allocated through the Core Strategy, planning permission <u>has since been granted</u> on all of the residential sites detailed and work has commenced on some of these and other development sites across the town. It is misleading to imply that the emerging neighbourhood plan could influence development on these sites. Additional text should be used to clarify the wider spatial and strategic planning context and greater reference should be made of the relationship to the future allocations and future growth levels that the NP could influence through specific local policies. Consideration could be given to use this section to detail the future choices / direction of growth which the NP could influence. This information will be detailed in the forthcoming Local Plan consultation but is also publically available. Specific text, along with other matters of advice can be discussed with officers, should you wish to take up the offer of

		<p>informal review sessions and ongoing discussions.</p> <p>On a similar vein the consultation feedback sections could be misconstrued as the only justification for a particular policy approach. Although you may have identified some community support for the key themes shown, any policy must be founded in evidence and a review undertaken to understand how such an approach aligns with the strategic priorities, before developing a policy approach. This is how the NP will be examined. This is also the first time the general public and the Council have seen the emerging policies.</p>
12	General	<p>Theme 2 and Theme 4 appear to cover much of the same information and review many of the same issues - consideration could be given to combining the sections to reduce repetition As it stands many of the policies do not meet the basic tests outlined in the PPG– Paragraph: 041 Reference ID: 41-041-20140306. See above extract.</p>
13	General – draft plan	<p>It is noted that the PDF version made available on the HTC’s web site is configured so that no section can be copied or comments added. This is acceptable for this stage but your attention is drawn to the NNDC guidance that at submission stage an <u>editable version will be required</u>. This is preferably in Microsoft Word format, but an unlocked PDF may be possible to work with. This reflects the legislative requirement that it is the Council who are required to amend the plan should it accept any recommendations made by the inspector prior to any referendum. A failure to supply the appropriate document will run the risk of delay and prevent the NP from moving to the next stages.</p> <p>Submission check sheets can be found on https://www.north-norfolk.gov.uk/tasks/planning-policy/neighbourhood-planning/</p>
14	Page 2	Second line – Title - Typo - repetition of the word ‘Council’
15	Page 3	Welcome the reference to future growth for the town.
16	Page 3	<p>Reference to encouraging all residents and stakeholders to respond - it is the steering group’s responsibility for <u>informing and seeking representations from</u> those who may not be residents but nevertheless have an interest in the parish as well as statutory consultees. Not all stakeholders such as land agents, land owners, developers and infrastructure providers live in the parish. Failure to adequately advise of a consultation could increase the risk of challenge at later stages. In any submitted consultation statement you will need to justify / demonstrate how such parties have been offered the opportunity to inform the plan at this stage. As previously advised, information is held by the Council on site ownership and promoters which could assist you in satisfying this requirement.</p>
17	Page 4	Map like others throughout is blurred and/or stretched – this should be amended in the submission. Text should be added that clarify that the neighbourhood plan area is the area that the emerging plan covers and has influence over.
18	Page 6	<p>Section 1.2 – As detailed above the starting point is the identification of key issues from the community. It is recognised that it is important to the NP group to reflect community aspirations, however, should the introductory text explain in more detail that before including policies on such aspirations <u>first</u> it should be checked that there is not an appropriate policy response in the Development Plan - local as well as national as detailed above and <u>secondly</u> that any aspiration and policy approach identified to address the aspiration is subsequently supported by evidence. Inspectors are increasingly</p>

		commenting on the lack of evidence to support policy development and such approaches run an increased risk of alteration and deletion by the inspector if it is not supported by more than just community feedback. This section provides the opportunity to explain how the NP sits with the Development Plan and should not be read as a standalone policy document.
19	Page 6	Section 1.2 – All Development Plans including neighbourhood plans need to be worded in a positive way to influence and facilitate development. Suggest the removal of the word ‘Protect’ - this is restrictive in this context and contrary to the NPPF – other such references should also be reviewed.
20	Page 10	In 2.3.1, 2.3.2 and 2.3.5 ‘The Holt Vision Document’ is referred to as ‘the Vision project’, ‘The Vision’ and ‘the Vision Study’ – could it just be referred to in one way? This is also an evidence document and therefore needs to be made publically available. The Vision Document was undertaken some time ago is it still relevant? Are you able to demonstrate that it remains relevant?
21	Page 11	2.4.3 Typo – ‘processes’ should read ‘process’
22	Page 12	2.5.3 the term ‘excluded development’ should appear in the glossary
23	Page 19	<p>Review your objectives as you progress your plan: You should always keep your vision and objectives in mind as you develop your plan; they should act as a marker. The policies should clearly flow from the issues and themes that you have identified in the vision and objectives. This will help you to structure your plan and remain focused.</p> <p>As the HNP is developed, new issues may come to light or you may decide to change your priorities. This could be as a result of significant comments received during community consultation or you may find that there is insufficient evidence to justify a particular policy approach. Your objectives (and even the vision) are not set in stone and could require review and amendments to reflect these changes.</p> <p>The views of the wider community and the issues collectively that the steering group and community think the plan should address may not of themselves be sufficient evidence to justify your vision, objectives and policies. As discussed above you will need to substantiate them with evidence. The study references the objectives as derived by “2012 Vision document” <i>which was formed by town councillors and other partners.</i> (HNP Page 10)</p> <p>Objectives should be deliverable and in the process of plan review these should be revised to remain connected to the emerging policies. –</p> <p>For example</p> <ul style="list-style-type: none"> • There is no objective relating to the natural environment despite there being a policy theme on environment. For that reason the Inspector could reasonably expect to see an objective relating to this theme. • In addition objective three has the potential to conflict with statutory policies around the Council’s allocation policy and should be revised in line with comments on policy 4 below in order to provide the appropriate link through the document and avoid conformity issues through examination. • Objective 1 refers to preserving the character of Holt but surprisingly does not refer to enhancing it. Whilst it does mention improving

		design, this is not necessarily the same thing. It is therefore suggested that the wording should be expanded to include the positive as well as the neutral. This would then align more closely with the statutory duty under s72 of the Planning (Listed Buildings & Conservation Areas) Act, 1990 as amended, which requires those exercising planning functions within conservation areas to pay special attention to preserving and enhancing. The objective would then align with national policy and avoid potential conformity issues with the inspector - this would need to be carried through to any appropriate policy.
24	Page 21	6.1.1. does not list all the documents that make up the LP – should also include: North Norfolk Proposals Map 2008 And list the North Norfolk Design Guide 2008 SPD & North Norfolk Landscape Character Assessment 2009, SPD as material considerations For clarity and consistency the Core Strategy and the Site Allocations references should have 'North Norfolk' as part of the titles. LDF is also old terminology – LDF's have been replaced by the term Local Plan A simpler way of reference would be the Development Plan of North Norfolk.
25	Page 22	6.3 To remain effective the emerging NP needs to also reflect the emerging Local Plan. Future iterations should detail the emerging spatial priorities. This section should be expanded to cover the emerging preferred overarching housing need and updated spatial strategy. It could and should also provide updates to the future broad areas of identified growth that this NP's policies will, once part of the Development Plan, influence development proposals. Officers can assist the Steering group should you wish to update this section. As referenced above NP's are required to plan positively to support local development outside the strategic elements of the Local Plan (NPPF, para 16). Given the fact that the NP is now emerging close to the revised Local Plan it is not unreasonable for any inspector to seek greater conformity or spatial context of the Local Plan contained in the NP.
26	Page 23	6.4.5 – the current status of these sites should be included here. As you are fully aware all these sites have planning permission. It is misleading to imply that the NP will have influence on these sites. Future iterations of the NP offer the opportunity to include this important contextual information.
27	Page 23	6.4.8 – Additional large scale development is also being undertaken on Cromer Road as part of current development in the town. For completeness an illustration/map of this site(s) should be included. To create mapping yourselves, either through your consultant or through the on line mapping available to Parish Councils the facility at http://www.parish-online.co.uk/ could be used.
28	Page 27	7.2 add word previous to results of <i>previous</i> consultation
		Design and Character.
29	Page 28 - 41	General - The Holt Society have undertaken much work in raising awareness of the importance of good Design. In particular, some of their published advice on colour and signage in a Georgian context could have been

		<p>transcribed into policy and thus given the HNP a more tailored, local feel, and the Society could be contacted for assistance. As it is, it could be seen by the inspector that some of the content of this policy / section is rather general and repeats some of the existing Development Plan.</p> <ul style="list-style-type: none"> • Whilst the desire to include building for life standards is laudable, these are classed as industry standards for new housing developments as published by the Design Council in January 2015. The Ministerial Statement of March 2015 identified that planning policies should <u>not</u> identify local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This included policies requiring any level of compliance with the Code for Sustainable Homes and others to be achieved by new development. The use of such standards has been overtaken by national policy. The examination process requires that the Plan is examined against national policy at the time of the examination rather than at the time of its preparation, (2013- 2018). Any requirement is likely to be removed on conformity basis. As can be seen in examiners reports for previous examinations of NP's across Norfolk the inspector has recommended deletion of any such policy requirements. However, the deletion of the policy does not in itself prevent the construction of dwellings to standards above the Building Regulations in general, or to Building for Life 12 standards in particular. This will be a matter for commercial judgement but cannot be enforced through a policy. It is recommended that clarifying text is added to section 8.7 so that the public are not mislead as to the level of influence of the NP and that policy 1, 1st sentence is amended appropriately (Page 38). This could form part of an aspiration outside the policy. A failure to accept this national policy compliance could result in the proposed approach being deleted by the inspector. • General comment regarding the structure of the chapter. It usefully begins by talking about the importance of good design, however, at 8.12 it then jumps into the world of demographics and social issues before briefly returning to design at 8.34. Whilst some of these issues obviously do have an influence on design, their intervention here does not help the flow and continuity of the document. Would they not merit a separate chapter? The demography and other local issues could be usefully documented in a spatial portrait of Holt in the early chapters rather than intertwined with the aim of justification to each approach. • Bullet point 1 - This is a duplication of CS Policy EN4 and, as currently worded, is not required in the NP. See first General Comment, above. • Bullet 2 policy 1 – This is a duplication of CS Policy EN8 and, as currently worded, is not required in the NP. See first General Comment, above. Irrespective a supporting reference to the Conservation Area (CA) should be added into this Theme's justification text. As written a supporting reference does not appear until much later in the document (at 9.15 in Key Theme 2). Even here, however, there is no explanation as to what a CA is or what it means in practice. There is also no mention / any recognition within the document of the Glaven Valley CA to the west of the town and which covers large parts of the HNP area not covered by the Holt CA. The Glaven Valley CA abuts the Holt CA and <u>should also be shown on a plan in the NP</u>. Whilst admittedly this designation is slightly unusual
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		<p>and currently under review it does have significant implications for any design and character considerations in the parish and should be detailed in the plan. The Council’s conservation officer will be able to assist the steering group more specifically if assistance is required.</p> <ul style="list-style-type: none"> • Bullet point 1 policy 1 – whilst the recommendation that schemes should include one and two bedroom properties is welcomed, the Development Plan policy H01 already includes this requirement and sets a percentage. Part of this policy is identified as strategic and the NP approach potentially raises conformity issues for the inspector. The proposed policy requirement in the NP has no percentage requirement and could be met by providing 1 x 1 bed + 1 x 2 Bed property in a scheme of any size followed by the remaining dwellings being larger. This bullet point should therefore be removed and a reference to the Council’s relevant planning policy should be included in the NP supporting text. In addition it is likely that the emerging Local Plan will develop a new strategic policy on tenure in line with wider issues of need and viability. It will be important to keep this policy approach under review as the LP evidence is updated. The risk being that the policy requirement will be superseded by the LP. • It is unclear why the paragraphs on waste disposal close out the supporting text here - might they not be more usefully be included under the infrastructure theme? • 4th bullet, although this can happen (e.g. Alysham), there is no known evidence to suggest that a policy is required in Holt or that it has been raised as an issue. How will the policy requirement be applied in areas of the parish where there is no main sewage system and septic tanks are the only available means? Suggest the word ‘mains’ is removed from the sentence. It may be appropriate for a new mains sewerage station to be provided, e.g. If development occurs in the more rural parts of the parish, such as through barn conversions. In these instances there may not be a mains sewerage system in the vicinity. Note the appropriate solution may be a package treatment plant or a septic tank or in rare cases a cess pit – this is determined by the submission of a foul drainage assessment with any application where applicants propose not to connect to mains – applicants have to be able to provide evidence as to why connection to a mains sewer is not feasible. The Environment Agency as the statutory consultee will provide statutory advice on any application and such advice would potentially be given more weight in any determination of an application. • 5th bullet this is not a design requirement, other than the requirement that affordable housing is tenure blind • Bullet point 7 – this is not a design or character requirement. The Council would not support the proposed approach which is more restrictive than the approach already in use and so the proposed approach could have an unintended negative impact. In Section 106 agreements the Council stipulates that it will use its best endeavours to spend financial contributions for affordable housing in the parish from which they were received <u>but will use them in an adjoining parish</u> if it is not possible to spend in the host parish or ultimately in any parish in North Norfolk. This approach ensures that the monies, which are time limited by law, can be spent and will not be required to be returned to the planning applicant if it is not possible (due to a lack of sites or the cost of purchasing an existing
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		<p>dwelling) to spend the monies in the host parish in the specified period. This approach is particularly important when small sums are received. The policy could also be seen as restrictive. The policy wording should be amended as a minimum to include adjoining parishes and should reference the Council’s strategic housing allocation policy.</p> <ul style="list-style-type: none"> • Bullet 8 – ref garage. This policy could restrict the provision for garages in flats and other affordable housing products as well as market housing. E.g. where a terrace of housing is proposed. Is such a requirement sufficiently evidenced? • Bullet point 11 - It should be acknowledged that developments may contain some private roads within them. It would be unreasonable to expect no sections of private road within a development (e.g. cul-de-sacs for a small group of houses). Suggest that this is un-workable and unreasonable and should be re-drafted. • Policies 2, 3 and 4 are not design policies and it would be useful to sit under a <u>housing and community theme</u> whose principal focus is on social issues. Such a structure would better reflect the issues the HNP is trying to cover and make the HNP more reflective of local issues rather than what appears to be a generic template used by some other NPs produced in Norfolk. That said: • Policy 2 – as above with regard to standards – the incorporation of dementia friendly principles being supported into a design policy does not lead to an effective policy. As above it could be seen as more of an aspiration outside the policy. Nowhere in the document does it set out what the ‘principles’ are. These need to be made clear. Developers and decision makers would need to be clear as to what is being encouraged. Should this only apply to certain types of development? Adding the wording “have regard to the principles”may be acceptable or a requirement for developers to submit a statement demonstrating how any proposal will have regard to the principles and how the proposal would / could (subject to viability) incorporate the principles could be a way around this issue. However it should be noted an inconsequential effect may be that all development needs to reflect the policy, what if the application is for one dwelling or designed for the younger generation e.g. ½ bed flats? • Policy 3 - Residential Care Accommodation - This is more a restatement of other policies than actually supporting the provision of <u>more</u> appropriate accommodation and confuses residential homes and supported housing. Housing with Care (sometimes known as extra care) is separate from retirement housing and separate from residential care properties. Not clear what is meant by a requirement to show a local need – how will this be evidenced or justified? It is unclear why this policy is needed and what it adds or how it could be applied. • Policy 4 - The pre-amble to this policy states that only affordable homes to rent would be subject to this policy and it would apply to initial and all subsequent lets and suggests that it is designed to allow younger people to remain in Holt; a) the wording is not carried through to the policy, b) the proposed policy will not achieve this requirement of keeping younger people in Holt. • It is not clear what the rationale for up to 25% of affordable homes being subject to these criteria is and why this percentage was chosen –
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		<p>any requirement needs to be supported by evidence and a reasoned justification on what the policy aims to achieve and how it is therefore relevant.</p> <p>The policy as it stands raises significant conformity issues with the Development Plan and the Council’s statutory duties for the operation of the Housing Allocations Scheme through which affordable housing in North Norfolk is allocated. The statutory guidance on allocations schemes states that “local lettings arrangements must not be used in such a way that there will be a failure to meet the requirement to give reasonable preference to statutorily specified groups”, removing up to 25% of affordable homes to rent (and especially if some types of properties which are especially needed in Holt are bound by the policy) is expected to negatively impact on the Council’s ability to ensure it is able to provide reasonable preference to those that are entitled to it. The Council has carefully designed the Housing Allocation Scheme so that affordable housing provided on Exception Housing Schemes are subject to the Local Allocations Agreement which provides priority to applicants who have strong local connections to the parish in which a scheme is located and the adjoining parishes. In addition, the Two Stage Allocation Process, allows all properties not on Exception Housing Schemes or subject to the transfer quota, which are not needed to house an applicant entitled to reasonable preference, to be allocated to an applicant with a local connection in accordance with the Local Allocations Agreement. This approach is already used for all vacancies of affordable housing in Holt and will continue. The inspector is likely to rule that such an approach if left in is in conflict with the Development Plan and undermines the national legislative requirement of the Council. Furthermore if the policy is not amended it is likely that it will also be queried how the decision is made as to which of the affordable homes are subject to this policy and who makes the decision? The selection of properties for being subject to this policy could increase the negative impact of the policy on the Council’s ability to meet housing need as it could remove those properties which are most needed to meet the housing need in Holt. The Council identifies what affordable housing in terms of the size and type of homes are needed to meet housing need in Holt and address existing shortfalls in provision.</p> <p>The implementation of the policy would be complex with affordable homes to rent on the same scheme having different allocation criteria, this is likely to cause confusion which could lead to incorrect allocations being made, especially as the proposed local lettings cascade is out of step with the Local Allocations Agreement which is built into the Council’s Housing Allocations Scheme and which provides a consistent approach to local housing need allocations.</p> <p>If the policy is retained the Council’s Housing specialist advises the following changes are needed:</p> <ul style="list-style-type: none"> • The policy refers to up to 25% of affordable housing to be made available to people on the Council’s ‘Housing Register’ – if this policy is retained this should refer to the ‘Housing List’. • Clarification of the minimum percentage or number of homes which should be captured by the policy is needed. The wording of up to 25%
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		<p>creates uncertainty, would a scheme delivering 1% such local homes be acceptable? Who would make the decision as to whether the proposed percentage is acceptable?</p> <ul style="list-style-type: none"> • Clarification of the local connection criteria is required. For example to have the highest priority how long do you need to have lived in Holt? Is this a day, a year, 2 years? Criteria v) and vi) should be deleted as they are outside the scope of the intention for this policy. People with family connections to Holt should also be eligible. <p>This however does not negate the principle of how the inspector will review the policy approach in the first case. Nor remove the conformity issue.</p> <p>An alternative local policy suitable for a NP policy would be to have a permissive policy for provision of further Exception Housing Schemes on sites outside the existing settlement boundary of Holt which could then be subject to a local lettings requirement and it is suggested that the Council's Local Allocations Agreement is used to determine local connection and the degree of priority based on strength of local connection. This would also create consistency for any new Exception Housing Scheme with the existing Exception Housing Scheme which serves Holt and the adjoining parishes.</p> <p>The NP has in its powers the ability to allocate such sites in addition to the strategic sites allocation process that is being brought forward through the Local Plan review.</p> <p>As above the council can assist in the development of such a policy.</p>
30	Page 30	8.12 The table 'figure 1' needs a date for when the figures pertain to
31	Page 32	8.16 Provides a figure of '86% increase'. It is unclear what this means in terms of number of people i.e. how many to how many?
32	Page 32	8.20 Refers to the 'principles' of dementia friendly communities. It would be helpful to list what the principles are. A copy of the Document should also be made available as part of the evidence base and / or web link provided.
33	Page 34	<p>8.26 Policy H02 of the adopted Development Plan requires 45% affordable housing, subject to viability and the reference to viability needs to be added to this paragraph.</p> <p>The policy also is aligned to national policy on 10 or more dwellings - the para needs to be amended to reflect the Development Plan policy H02 correctly.</p> <p>Please note specific viability evidence has been commissioned to inform the Local Plan review of this policy.</p>
34	Page 34	8.28 - delete reference to 'reasonable preference criteria' in wording about the Housing Options Register
35	Page 34	8.24 Typo line 4 remove 'the' from '...scale in <u>the</u> locating...'
36	Page 34	8.28 –the SHMA reference needs to include the year it was produced and should detail the time line the figure refers to. It is different from the HNP time line and differs between versions. The figure quoted is from an older version and is not the most up-to-date evidence – update to reflect the 2017 SHMA - the OAN is 8,581 <u>not</u> 10,067 which is a longer time period and

		<p>reported in an earlier version. Additional text should be added that the Council will use this to inform the setting of a housing target which may be higher.</p> <p>Note the Government have consulted on a revised housing needs methodology and it is expected that once published the required methodology could result in a higher OAN being identified.</p> <p>8.28 Typo – full stop required at end of last sentence.</p>
37	Page 35	8.30 – text would need to be amended to reflect the required policy review
38	Page 35	8.31 – reference to ‘some people’ – what does this mean – is there a better way of saying this?
39	Page 37	<p>8.38 Lists 13 documents which it states ‘support’ Policies 1, 2, 3 & 4. Use of the word ‘Support’ is misleading. Perhaps could use ‘inform’</p> <p>Some of the titles of the listed documents are not provided in full and / or do not state the year of publication. As above, quotes used have been incorrectly referenced. The documents and the necessary facts used in the NP should be checked.</p> <p>There is no indication given of where people can view these documents. At least 2 of these are not available using a google search.</p> <p>As stated above, all supporting documents used should be made available to the public through the HNP website or links added to where they can be found. These inform the plan so it is reasonable to allow those commenting on it to judge if the evidence is being used correctly and for the NP group to provide transparency in the plan making process</p> <p>This matter is repeated on pages 49 (9.28), 56 (10.19), 63 (11.20) & 68 (12.20)</p>
40	Page 39 and every policy	<p>8.40 ‘Core Spatial Planning Core Aims’ not sure what this is meant to refer to – possibly should say ‘North Norfolk Core Strategy Core Aims and Objectives’ – This wording is used after each policy and will need to be amended accordingly. Such a statement here is also not required and is superfluous. At any submission stage there is a requirement to demonstrate in the Basic Conditions Statement how each policy is seen to be in conformity. The correct document to refer to and to use in formulating the HNP policies is the conformity guidance note published on the NNDC website – link provided earlier in this review.</p>
		ENVIRONMENT
41	Page 43	9.6 Typo line 3 insert ‘and’ after ‘pine’
42	Page 44	<p>9.11 Typo line 1 ‘north Norfolk’ should read ‘North Norfolk’</p> <p>Consider rewording as it is unclear how new footpaths and cycleways ‘aid wildlife movement’. Green corridors, which would allow for the movement of wildlife as well as people, may include footpaths/cycleways but should also incorporate other green infrastructure (e.g. trees, hedgerows, grassland etc.)</p>
43	Page 45	9.12 repeats paragraph 9.2
44	Page 46	Typo line 2 ‘hall’ should read ‘Hall’
45	Page 46	The Holt Conservation Area Map under 9.17 is out of date and does not reflect the boundary revisions made as part of the review concluded in 2010; i.e. three areas were removed from the boundary at this time. In order to

		prevent the inspector from removing superseded information this map will need to be updated and reflect the current position.
47	Page 48	Important open space. For planning purposes, it is important to undertake a review of the open space to determine their special / important qualities. What is the underlying evidence supporting table 1? How has the list of important open spaces been determined and qualified? The starting point is no doubt consultation feedback but the sites then need to be assessed.
48	Page 50	Policy 6 This is duplication of CS Policy CT1 and, as currently worded, is not required in the NP. See first General Comment on duplication above. If the NP wishes to include a policy on Open space then it should be locally specific and not duplicate the existing policy. For example It is not clear what ' <i>demonstrated that the benefit to the local community outweighs the loss</i> ' means. The policy instead could list the, criteria that should be used by an applicant to measure this? And be locally specific.
49	Page 51	Policy 7 – section 66 of the Planning (Listed Buildings & Conservation Areas) Act, 1990 as amended requires heritage assets to be preserved not protected. Change policy heading – delete protection and replace with preservation (to accord with legislation and NPPF). As worded the policy focusses quite narrowly on listed buildings. Heritage is much broader than this and covers all traditional properties within the area (whether they be listed, locally listed or not listed). It also is inextricably linked to conservation areas which are covered under the previous theme. Due to this narrowness the policy issue is already covered in the existing Development Plan policy EN8, it is also in part a duplication of HNP policy 1 and is not necessary on both counts (as it is duplication). The Council advise that areas of duplication should be reviewed and removed prior to submission. Areas of duplication are one of the examiners tests and it is highly likely that such as policy will be deleted. Holt benefits from a distinctive commercial offer which comprises small scale retail outlets and gallery spaces. This aligns quite nicely with the Georgian architecture and the general ambience and thus helps set the town apart from some of its competitors. It would therefore be reasonable to expect that any additional policy on heritage is tailored specifically to the Local identity of Holt. It is recommended that these unnecessary policies are rewritten to specifically value and preserve/enhance these qualities - again giving the document more of a bespoke feel and local purpose.
		Tourism and employment
50	Page 52	10.2 line 2 – Typo 'north Norfolk' should read 'North Norfolk'
51	Page 55	10.15 The text <i>new employment in the countryside will be supported where it can be demonstrated it would make a positive contribution to the conservation area?</i> What is meant by this – the conservation area covers the town, it reads like a policy but is not a policy as it is in the body of the document. The supporting text goes on to require applications to be assessed against criteria set out for the protection of the character and appearance of Holt. However, no such criteria are detailed. Any policy should be written to include an action and in this case require a proposal to demonstrate the potential amount of impact on the town centre. This then raises the acceptable amount of impacts. Any acceptable level will need to be in line

		with the NPPF and be backed by appropriate evidence. Overall this approach runs the risk of being considered unreasonable.
52	Page 54	<p>10.9 The referenced study requires the year to be included in order to accurately identify it. The study, as part of the evidence, should be made available on the HNP web site or at least a link provided to the NNDC web site where it is published.</p> <p>Clarification – although the Aldi store has not come forward there is an extant planning permission for retail development on the site. The section should be updated to reflect that rather than the specific end user.</p>
53	Page 57	<p>Policy 8 - This policy appears to duplicate existing Development Plan policies EN4, EN9, EN13, EC1, EC3 and conflicts with SS2 and EC2 – it does not add any local distinctiveness to the Development Plan policies. As such it is likely that the inspector will delete such duplication.</p> <p>The first part of the policy (the intro) which details the requirement to comply with the HNP and Development Plan is again superfluous as determination of any planning application must be in accordance with the Development Plan unless material considerations indicate otherwise.</p> <p>The use of ‘unacceptable’ is difficult to measure. Would suggest this is changed to ‘significant’.</p> <p>It is not clear what would constitute a ‘negative effect’ or how this would be measured. It should be clearer on what is expected of developers and how the policy should be interpreted; as written it will be ineffective as it details no specific operational or measurable criteria.</p> <p>National guidance states that <i>“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306”</p> <p>As it stands there is a distinct risk that the policy will be deleted by any inspector.</p>
54	Page 58	<p>Policy 9 - again a duplication of a strategic policy – a NP needs to reflect the published guidance sheet on strategic conformity in line with the PPG guidance issued by DCLG. The existing Development Plan details the acceptable locations of tourism development in the principle settlements through policy EC 7 and requires a sequential assessment of sites in the countryside. Policy 9 does not add any local distinctiveness to this policy and will be ineffective. Consider deletion, re wording or the identification of a specific suitable and available site for allocation.</p>
		Leisure and Tourism
55	Page 59	<p>Figure 4 requires a date for when the data relates to and would benefit from adding the source link.</p>
56	Page 60	<p>11.5 line 4 – Typo remove ‘a’ from after ‘of’</p>

		11.9 confusion here with earlier section on open space
57	Page 63	<p>Policy 10 - The policy has no operational element that would require additional facilities to be provided and is therefore ineffective. As worded it is an aspiration and contains no policy mechanism to achieve it. Policy CT3 of the Development Plan supports provision of community facilities and is aligned with the NPPF para 70. This policy is therefore seen as duplication.</p> <p>In order to add local distinctiveness the policy could be revised to include specific community facilities that could be provided / supported in light of growth; i.e. the evidence should include a review of existing facilities and the requirement for additional facilities in line with a national methodology. The policy could also add local detail through focussing on what to do in the event of a loss of any facilities through a specific proposal; e.g. alternative facilities of better quality, improved access etc. should be provided. However care will be needed not to duplicate existing Development Plan policies.</p>
		Infrastructure
58	Page 65	<p>12.2 – delete ‘and via a S106 agreement / S278 agreement’ as ‘through planning obligations’ already covers this.</p> <p>- Typo – delete ‘a’ after ‘of’ in line 3</p>
59	Page 66	12.14 – Typo line 4 – insert ‘are’ before ‘currently’
60	Page 68	<p>Policy 12 - The aspiration is welcomed, however caution is advised – as reads as if such applications came forward that all such application would be supported regardless of any impacts and location - is this what is intended? What if an application came forward for the next generation of mobile technology 5G? These use higher frequency radio bands which travel less well than existing 4G and will require further booster stations to ensure adequate coverage. Should the policy review where and how such infrastructure could be located? E.g. it could comment on appropriate issues in the conservation area. What is meant by ‘superfast broadband’?</p> <p>Note as a requirement of building regulations (as of 1st January 2017) there is a requirement for new buildings to have physical infrastructure to support high speed broadband (>30Mbps). However, it remains that there is no requirement to provide external or site wide infrastructure beyond the access point. Improving broadband is often a commercial decision, however the HNP could explore ways in which site wide infrastructure is provided at the time of development in order to bring improvements and to align with the objective and ensure new development is provided with high speed connections at occupation.</p>
61	Page 69	<p>Policy 13 - As worded the policy does contain some local distinctions from the existing Development Plan policy CT5 in that it requires some enhancement of existing networks and does add some local flavour. However, there are other areas that the policy seems to add no value or local distinction and could be considered as disproportionate.</p> <p>The NPPF however, stipulates that proposals cannot be refused on transport grounds unless the residual cumulative impacts of development are severe. The NPPF states that a Transport Statement or Transport Assessment is required where a development will generate significant amounts of movement. Any policy needs to identify which type of submission is required. It is questioned how and why the threshold of 11 or more dwellings and all</p>

		<p>commercial development has been arrived at. Is this supported by evidence? And has the Highway authority been involved in the development of such an approach.</p> <p>The adopted NNDC validation list currently includes the requirement to provide a transport statement as between 50 -100 dwellings and a full transport assessment for proposals over 100 residential units. There are also varying thresholds for different amounts of types of commercial development and of commercial floor space. Any policy should align to these requirements which are informed by NCC as the Highways statutory body and form part of the Councils adopted policy.</p> <p>If all new development needs to comply with this policy then, as currently worded, even a development of one dwelling would be required to provide a footpath/cycleway or public transport improvement; this is not reasonable and disproportionate. Is it what is intended?</p> <p>Similarly there are large variations in Use Class and scale of commercial development which could be located throughout the district under the banner of commercial development. Requiring “all commercial development” to contribute / provide various assessments is unrealistic and disproportionate.</p> <p>Once the assessment is undertaken, how is the assessment to be used in the determination of planning applications. The NPPF only requires refusal where it is proven the cumulative effects are severe. It is therefor considered the requirement is potentially onerous and disproportionate and runs the risk of failing the Basic Condition tests.</p> <p>The policy calls for any such assessment to include surrounding parishes. The neighbourhood plan jurisdiction is confined to the defined NP area and any requirement to apply a policy outside is beyond the jurisdiction of the plan and runs the risk of deletion.</p> <p>Overall and on balance it is considered that this policy is not a justified or effective policy and should be deleted or converted into supporting / aspirational text. The assessment of traffic is part of the process in determining a planning application. Any such assessment is provided by the statutory highway body as part of the normal process in line with national policy.</p>
62	Page 69	<p>Policy 14 is not a policy as currently worded, it is an aspiration; there is no mechanism to be applied. A general policy encouraging community facilities is not necessary as this would be dealt with under existing Development Plan policies. The inspector is likely to find it is not required.</p> <p>If it is intended to give further encouragement specifically to healthcare and educational facilities then a different policy approach would be needed, e.g. setting out the reasons for exception to the general policies. Specific justification would be needed for this.</p> <p>FYI the identification and provision of additional healthcare and associated health infrastructure is the responsibility of Health service providers. In</p>

		conjunction with the CCG / NHS England the local health practice identify growth requirements in order to support residential growth. The Council have signed up to a Norfolk Wide Health Protocol along with NHS England and the North Norfolk CCG. Applications are consulted on with the relevant healthcare providers. A s106 contribution has been collected for health care improvements in association with recent larger scale planning permissions in Holt as requested by the local providers. It is an ongoing commitment and part of the Development Plan. However it remains up to the health providers to identify the need and decide how the monies are spent.
63	General	Infrastructure section General – given the aspirational nature and duplication of most elements of policies in this section would it not be better to undertake a full review of the existing Development Plan policies and seek to provide one NP policy covering local aspects which can add some meaningful value to the existing policies rather than seeking to duplicate the general existing policies?
		Delivery , implementation and Monitoring
64	Page 71	13.15 line 2 – Typo – amend ‘maybe’ to ‘may be’
65	Page 73	Description of ‘Broadband’ explains speeds of broadband. – This should be in the policy. Could include description ‘a high-capacity transmission technique using a wide range of frequencies, which enables a large number of messages to be communicated simultaneously’.
66	Page 74	Description of ‘Brownfield land or Previously Developed Land’ only cites part of the definition from the NPPF. Amend text to include the whole definition so that it is understood what land is excluded.
67	Page 76	Description of ‘greenfield land’ – states ‘does not include residential garden land’ – this is not entirely correct. Amend text to reflect actual situation.
68	Page 76	Description of ‘Listed Building’ In line 1 second sentence; the correct order of importance for the grades is ‘I, II* or II’ rather than ‘I, II or II*’
69	Page 77	Description of ‘Permitted Development’ – correct citation of the legislation is ‘The Town and Country Planning (General Permitted Development) (England) Order 2015’ – amend the text
70	Page 78	Definition for settlement boundary - is poor and should be amended. A settlement boundary is a line that is drawn on a plan around a settlement, which reflects its built form, it is a policy tool reflecting the area where a set of plan policies are to be applied. This could include policies within your Neighbourhood Development Plan. In general, there is a presumption in favour of development within the settlement boundary. Any land and buildings outside of the boundary line are usually considered to be open countryside where development would be regulated through other policies of the Development Plan
71	Page 79	‘SPD’ – update definition - it is a document that adds further detail to the policies in the “Local Plan”. SPD’s can be used to provide further guidance for development specific issues; they are a material consideration in planning decisions.
Sustainability Appraisal		
72		It has been previously advised that the production of an SA is not a requirement of the neighbourhood plan process, as detailed in the PPG, and can confirm that given the general content of the emerging plan the production of an SA has limited value. Through the Basic Conditions

		<p>Statement there is requirement to demonstrate how the HNP contributes to sustainable development and the production of an SA in this case is seen as disproportionate and an obvious and unnecessary onerous task. The document is not an examination document and although it contains a number of serious errors and omissions, given that the examination will focus on the Basic Condition tests and not the SA, it is considered that a full critique does not warrant the resource necessary, especially as previous detailed commentary has been given.</p> <p>However as the steering group have decided to continue in the production of an SA and given that the legislation requires that it is iterative and used to inform plan development the SA should be kept up-to-date. The previous comments on the scoping report provide a starting point. Going forward the document should be updated to incorporate the information previously supplied. It would be expected that the comments supplied at the time of consultation are in any case detailed along with the other statutory bodies' replies and a response justified in the required Consultation Statement at any submission stage.</p> <p>If the intention is to use the SA report to demonstrate that the HNP contributes to sustainable development, as a minimum the SA objectives need to be expanded to include the full 16 SA objectives of the Local Plan - otherwise how can it be used? These have previously been sent to the steering group / consultant tasked with the production of the HNP but should you require an additional copy please get in touch.</p> <p>As advised in correspondence on the 17.11.17 an alternative approach would be to use the full framework but to develop a simpler matrix SA rather than a full blown appraisal of all the policies. It is considered that this would be a much more cost effective, proportionate and simpler approach and considerably less work and broadly acceptable in demonstrating sustainability objectives. The matrix could then help address one of the basic conditions tests without repeating the inaccuracies contained in the SA as well as the cost.</p>
Compliance with the SEA Directive.		
73		<p>As previously advised and to avoid any ambiguity it is the Council as the Local Planning Authority and as the responsible body under regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004, that has to satisfy itself that the regulations have been adhered to. It was agreed that as part of the support offered to HNP at the meeting on the 08.11.17 that a screening opinion would be requested from the Council once the policies of the plan had become known. This would be done through the submission of a screening report detailing the environmental considerations such as the locations, type and characteristics of the relevant European designated sites. E.g. Holt Lows SSSI, Holt Lows and Valley Fens SAC, County Wildlife Sites, country parks, ancient woodlands, Public Right of Ways, priority habitats etc. Much of this information can be obtained from Natural England and "magic maps". The Council as the responsible body will review the information provided and consult on its determination and the provided evidence with the statutory bodies.</p>

		<p>The SA report includes an attempt at a screening determination which appears to be the same version consulted on at the time of the SA scoping documents (as detailed in text page 29 of the SA). This was undertaken prior to developing any of the HNP policies and the detailing of any of the known environmental considerations that need to be taken into account. Furthermore the responses of the three bodies listed, plus the County Council and NNDC, have not been provided in order for HNP to demonstrate to NNDC as the responsible body that the regulations have been applied and adhered to. At this stage the Council remains to be convinced that the screening determination is robust or based on any knowledge of the relevant considerations and is not satisfied that the regulations have been fulfilled.</p> <p>The legislative requirement placed upon the Council to satisfy itself that the SEA has been complied with and the NP regulations at submission stage of a neighbourhood plan require that the Council's must satisfy itself that the required documents have been provided, are in the correct format and contain the level of detail to enable publication, public participation and examination.</p> <p>In order for both HNP and the Council to meet the respective legislative requirements and obligations it is considered that the steering group submit the required screening report and request an up to date and robust screening opinion from the Council, as previously agreed. The screening opinion is an examination document and will be required in order to proceed. It is suggested that given the potential for significant amendments to the emerging plan that this request is received following further work on the policies but prior to final submission of the NP.</p>
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Housing & Economic Land Availability Assessment (Part 2)

Summary: This report provides updated evidence to inform the preparation of the Local Plan. The Housing Economic Land Availability Assessment Part 2 has been prepared to determine the employment land supply from identifiable land in North Norfolk over the next 20 years.

Conclusions: That the report is published as a source of information to support the emerging Local Plan.

Recommendations: **This report recommends that the Working Party recommend to Cabinet:**

- a) To accept and publish HELAA Part 2 which covers employment land as a source of evidence to support the emerging Local Plan for North Norfolk to cover the period 2016-2036.**
- b) That delegated authority is given to Planning Policy Manager to undertake minor amendments to the report and associated mapping in order to publish.**

Cabinet Member(s)	Ward(s) affected
ALL Members	All Wards
Contact Officer, telephone number and email: Stuart Harrison, Planning Policy Officer. 01263 516308. stuart.harrison@north-norfolk.gov.uk	

1. Introduction

- 1.1 The purpose of Housing and Economic Land Availability Assessment (HELAA) Part 2 Report is to provide information on the range and extent of land which could be considered for development to meet the needs identified for employment land in North Norfolk across the period 2016-2036.
- 1.2 The HELAA Part 1 report was presented to members at the April 2017 Working Party which detailed the position on residential land availability.
- 1.3 The HELAA Part 2 provides a high level assessment of potential and existing employment sites identified from a number of sources. The attached report provides the context of land supply in the district and provides:

- An updated baseline figure for the amount of land in employment use throughout the District;
- An assessment of the amount and location of existing and available employment land for economic growth;
- Evidence to inform the detailed site assessment and the subsequent identification of preferred options for the emerging Local Plan.

1.4 It is important to note that the HELAA does not represent policy and will not determine whether a site should be allocated in the Local Plan or granted planning permission. Nor is it the purpose of the HELAA to identify what locations are “sustainable”. It is in effect a ‘pool’ from which Local Plan proposal sites can be tested and bought forward. It also represents a ‘snapshot’ of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at January 2018.

2. Methodology

2.1 The methodology for this assessment is in accordance with the guidance set out in the Housing and Economic Land Availability Assessment section of the National Planning Practice Guidance (27 March 2015). In line with the guidance this methodology was made available for consultation, (21 March - 3 May 2016) and informed by key stakeholders’ views on the approach to be used to assessing the amount of land available for development in the area. The full methodology was detailed in the HELAA Part 1 report and will not be repeated, in full, in this document.

2.2 The HELAA has been prepared from sites which are designated or allocated employment sites, known employment sites and other sources which are detailed in Table 1 below. A total of 126 employment sites have been identified as sites that have an existing employment use or have potential capacity for employment use.

Table 1: Source of Sites

Source	Number of Sites
Designated Employment Sites	23
Enterprise Zones	2
Allocated Employment Sites	9
Employment Land Review sites	6
Call for Sites & developer nominations (including mixed use)	40
Parish and Town Council Workshops	23
Existing Employment Sites (not designated)	21
Publically owned land	27
It has to be noted that these figures includes duplication – as sites have been included from a number of sources. i.e. a site may have come forward via parish council workshop and through call for sites, etc.	

- 2.3 The HELAA Part 2 report contains the following:
- Details of the methodology used to assess the suitability, availability and achievability of sites for economic development;
 - Analysis of findings from the site assessments;
 - Summaries of all site assessments and associated mapping which includes online mapping.

3. Employment Land

- 3.1 Employment Land is defined as land allocated for business, general industrial and storage/distribution uses as defined by Classes B1, B2 & B8 of the Town and Country Planning (Use Classes) Order 1987 or with an extant planning consent for such uses. Employment uses exclude retail, leisure, residential care facilities, mineral extraction and waste disposal. Employment uses include:
- B1a: Offices other than in a use within Class A2 (Use Class Order 2005 Definition);
 - B1b: Research and Development – Laboratories, Studios (UCO 2005 Definition);
 - B1c: Light Industry (UCO 2005 Definition);
 - B2: General Industrial (UCO 2005 Definition);
 - B8: Storage or Distribution (UCO 2005 Definition).

4. Key Findings

- 4.1 A total of 126 sites were assessed for their potential economic land capacity. Of these sites 38 were excluded owing to not meeting the site size thresholds or having an absolute constraint (as detailed at Appendix 2 of the [full report](#) (available online only due to size). This resulted in a total of 88 sites that were assessed using the full HELAA assessment methodology.
- 4.2 Following the assessment there were 58 sites identified with employment land capacity with a total potential capacity of 168 hectares. Table 2 provides an overview of the sources of sites and indicative area and floor space which form the potential economic land supply for the district.

Table2: Overview of Assessment

	No. of sites	Site total size (ha)	Area in Employment Use (ha)	Area available (ha)	Estimated Floorspace available (sqm)
Total Number of Employment Sites	126	652.6	277	241.3	965,194
Number of sites assessed using HELAA methodology	88	585.3	233.7	240	959,834
Sites assessed to be Suitable	82	528.3	232.9	214.1	856,474
Sites assessed to be Available	59	479	232	172.0	688,091
Sites assessed to have Capacity	58			168	671,895
Capacity within Towns	38			92	357,939
Capacity in Service Villages	1			5	20,000
Capacity in Countryside Villages	18			71	283,956

- 4.3 The assessment has identified that, District wide, there is a total of 277 hectares of land currently in employment use and has identified that there is the potential for 168 hectares of employment land available during the plan period. If all this land was developed for employment purposes there would be 445 hectares of employment land available in North Norfolk over the plan period 2016 to 2036.

Table 3: District wide - Employment Land Baseline & Potential Capacity

District	Area (ha)	Estimated Floorspace (sqm)
Existing Employment Land in use (baseline)	277	1,108,000
New Employment Land Available	168	671,895
Total Potential Employment Land	445	1,779,895

- 4.4 In the towns of North Norfolk there is around 145 hectares of land currently in employment use and the assessment has identified that there is potential capacity of an extra 92 hectares of land on those sites which were assessed through the HELAA methodology. This equates to an increase of potential capacity of around 64% in towns. The majority of this extra capacity, in the towns, is on new sites or extensions to existing employment sites.

Table 4: Towns - Employment Land Baseline & Potential Capacity

Towns	Area (ha)	Estimated Floorspace (sqm)
Existing Employment Land in use (baseline)	145	58,000
New Employment Land Available	92	367,939
Total potential Employment Land	237	425,939

- 4.5 There will be further capacity on those sites which were ruled out due to not meeting the minimum site size threshold.

5. Next stages

- 5.1 The findings of the HELAA will be used alongside other evidence documents, to inform the production of the Local Plan by helping to identify development options for consideration and assessment.
- 5.2 Further work will be carried out to identify the most appropriate location and distribution of employment land and the approach to allocations and designations over the plan period in line with the development strategy in the emerging Local Plan.

6. Legal Implications and Risks

- 6.1 The National Planning Policy Framework (NPPF) requires that Local Planning Authorities (LPAs) maintain an adequate supply of employment land in their area. As part of this, they must establish realistic assumptions about the supply of suitable and available deliverable housing and economic land to meet the identified need for housing and economic uses within their area over the plan period.
- 6.2 The National Planning Practice Guidance, PPG provides guidance on what the assessment should contain which this methodology has taken on board.

7. Recommendations

- 7.1 This report recommends that the Working Party recommend to Cabinet:
 - a) **To accept and publish Housing Economic Land Availability Assessment Part 2 Report which covers employment land as a source of evidence to support the emerging Local Plan for North Norfolk to cover the period 2016-2036.**
 - b) **That delegated authority is given to Planning Policy Manager to undertake minor amendments to the report and associated mapping in order to publish.**

Appendix 5: Housing Economic Land Availability Assessment Part 2 Report
[\(online\)](#)

Appendix 6: Site maps **[\(online\)](#)**

Local Plan – Approach to Amenity Land

- Summary: The background evidence paper provides a review of open land designations to inform the preparation of the emerging Local Plan. The study will inform the emerging Local Plan with final proposals undergoing public consultation as part of the consultation on the 1st Draft Plan Regulation 18 consultation. This document will form part of the background evidence.
- Conclusions That the report is published as a source of information to support the emerging Local Plan
- Recommendations: **This report recommends that the Working Party recommend to Cabinet to accept and publish the Amenity Green Space Topic paper as a source of evidence to inform the emerging Local Plan for North Norfolk to cover the period 2016-2036.**

Cabinet Member(s)	Ward(s) affected
All members	All Wards
Contact Officer, telephone number and email: Iain Withington, 01263 516034 iain.withington@north-norfolk.gov.uk	

1. Introduction

- 1.1 As part of the updating of the evidence base required informing the emerging Local Plan, Officers have undertaken work to review the current Local Plan Open Space Designations. At the same time Town and Parish Councils were invited to submit site suggestions for the new designation of Local Green Space. The review will inform land use decisions in the emerging Local Plan for those sites judged to make the most significant contribution to providing open space in relation to settlement character and appearance, play an important community role and or provide for educational and formal recreation. (See [Appendices 7 & 8](#) (online))
- 1.2 The review will inform the emerging Local Plan with final proposals undergoing public consultation as part of the consultation on the 1st Draft Plan Regulation 18 consultation. This document will form part of the background evidence. The First Draft Local Plan will detail overarching policies on how these important Designations will be taken into consideration in the decision making process.
- 1.3 For the purposes of this review Amenity Space, Education and Formal Recreation Areas include: Public & private open space, School Playing fields, sports pitches, Churchyards, Village Greens, and Urban Woodlands. The purpose is to update the district’s designated Open Space, Education and

Formal Recreation designations in line with updated national policy through a review of existing designations within settlements and to incorporate a new designation of local green space which was introduced through the National Planning Policy Framework, NPPF into policy.

Amenity space Designations.

- 1.4 The approach follows a review of settlements which have existing designations as shown on the 2008 adopted proposals map, many of which were carried over from the previous adopted Local Plan in the 1990's.
- 1.5 All of the existing designated sites have undergone a desktop review and site visit. A site visit proforma has been completed for each site, designed to record essential site characteristics, appearance, accessibility, visibility as well as any other observations around the qualitative nature of the site.
- 1.6 Initially sites that lie outside the existing settlement boundaries and therefore benefit from open countryside policy were excluded from the further consideration for future designation in this review. However during the course of the review it became apparent that there were a number of inconsistencies across the District in relation to the designation and non designation of similar sites adjacent to the settlement boundary. These sites along with suggestions from Town and Parish Councils have been picked up in the review to provide a comprehensive evidence base to inform plan making.
- 1.7 Whilst acknowledging that very small areas of amenity greenspace on housing estates and road side verges make an important contribution to appearance of an area, the approach has generally been to discount such small sites from any recommendation and future designation. Recommendations are generally confined to those larger areas of land that contribute to the character of a settlement and provide functional open space.
- 1.8 Where the extent of a proposed designation has changed the new extent has been mapped and proposed changes recorded in the results table. Minor changes to the extent as a result of changes in base mapping are not intended to be specifically detailed.
- 1.9 Sites in Corpusty and Saxthorpe have been proposed through the pre submission Neighbourhood plan and are therefore excluded from this review. Once adopted any such designations will form part of the proposals map.

Local Green Space Designations.

- 1.10 The recommendations for Local Green Space (LGS) designations follow a review of sites suggested by Town and Parish Councils. In line with the requirements of the NPPF and national Planning Practice Guidance (PPG) all sites put forward for LGS have been assessed against a set criteria.
- 1.11 The NPPF sets out how local communities can identify green areas of particular importance to them and seek to designate land as Local Green Space. Local Green Spaces should only be designated when a Plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period¹. Paragraph 77 states:

¹ NPPF, 2012, para 76

The LGS designation will not be appropriate for most green areas or open spaces. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land.*

- 1.12 Any designation of spaces must be based on evidence to demonstrate why the green area is demonstrably special to a local community and holds a particular local significance. The PPG provides additional guidance and states that:

Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.

Paragraph: 007 Reference ID: 37-007-20140306 - Revision date: 06 03 2014

- 1.13 The guidance goes on to provide further detail to NPPF paragraph 77 from which decisions on the suitability of sites should be based upon. Such considerations include if the site has been proposed for development or already benefits from an environmental designation of protection.

- 1.14 Only those sites put forward by town and parish councils have formed part of the LGS assessment. Where large tracts of land have been suggested or sites are remote /removed from the settlements, in line with the criteria in the NPPF, they have been discounted. Where no supporting justification of why land was thought to be demonstrably special to a local community was received the assessment is based on officer's judgments and the available information at the time of assessment. Similarly, where no location map was provided sites have been identified from descriptions provided and best endeavors.

2 Results

2.1 Total Sites Considered

Amenity Green Space & Education / Formal Recreation Areas * (256)
Local Green Space suggestions (226)

Recommendations

Amenity Green Space (232) including 12 Education / Formal Recreation Sites** + 125 Local Green Space sites.
Local Green Space (7)

Alternatives Considered

Local Green Space (94)

Amenity Green Space & Education / Formal Recreation Areas (13)

Total Land Mass Designated (ha)

Local Green Space (1.1)

Amenity Green Space (350.6)

Education / Formal Recreation Areas (148.7) ***

* Includes existing and additionally identified sites

**60 Sites are designated as Education / Formal Recreation Areas. Of this figure 49 are also designated as Amenity Green Space and therefore when totalling the number of sites considered for AGS / REC 49 duplicates have been deducted, leaving 11 sites with Education / Formal Recreation Area designation.

***To avoid double counting, the figures for 49 of 60 sites which also have Amenity Green Space designation have been excluded.

3. Recommendation

- 3.1 This report recommends that the Working Party recommend to Cabinet to accept and publish the Amenity Green Space Topic paper as a source of evidence to inform the emerging Local Plan for North Norfolk to cover the period 2016-2036.

Appendix 7 – Amenity Green Space Topic paper (online)

Appendix 8 – Alternatives Considered. (online)

Abbreviations:

NPPF- National Planning Policy Framework

PPG – Planning Practice Guidance

LGS – Local Green Space.

Site Assessment Process

Summary: The purpose of this report is to inform Members of the proposed process for Site Assessment and agree the timetable for the selection of preferred options for inclusion in the emerging Local Plan consultation

- Recommendations:
- **That Members consider the contents of this report and the proposed site review methodology is used as a basis for future site assessment in the emerging Local Plan**
 - **That Members agree the proposed methodology as a basis for future site selection and agree the proposed site visit dates.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Jodie Rhymes , 01263 516304 jodie.rhymes@north-norfolk.gov.uk	

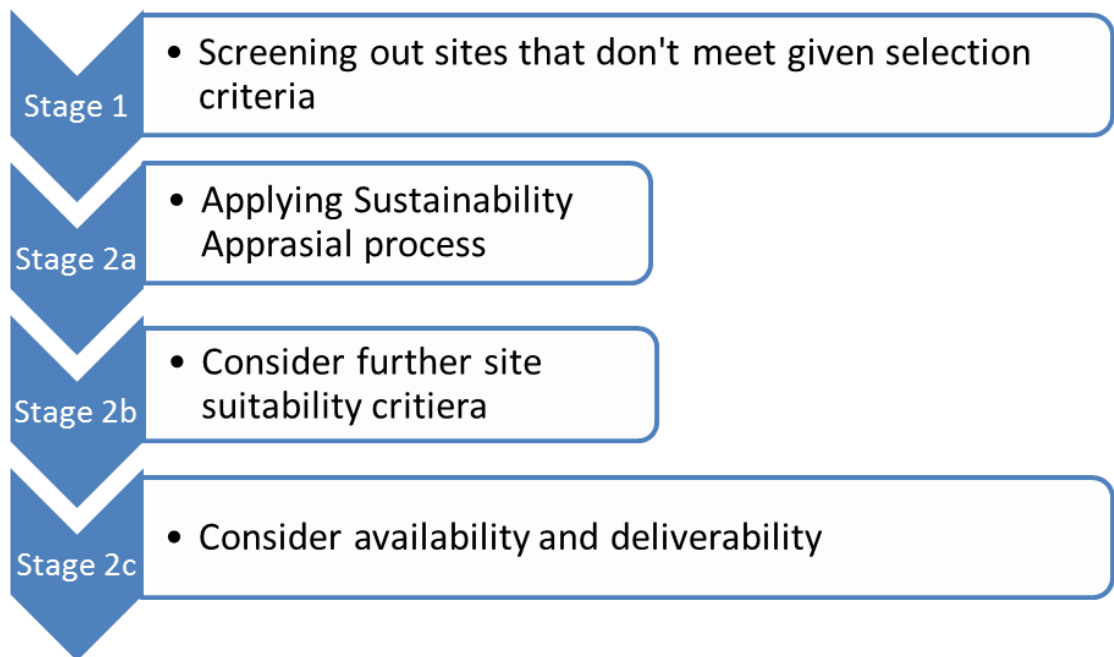
1. Introduction

- 1.1 North Norfolk District Council is producing a new Local Plan. This new Plan reviews and updates our currently adopted Core Strategy and Site Allocations Development Plan documents and when adopted, it will replace these and together with any Neighbourhood Plans will form the adopted Development Plan for the District. The new Plan will cover a twenty-year plan period commencing in 2016 through to 2036.
- 1.2 As well as identifying how much development the district needs over the Plan period (2016-2036) the Plan will also need to allocate sufficient land to meet the development requirements.
- 1.3 The NPPF, Paragraph 47 states that there is a need to ensure that Local Plans identify key sites which are critical to the delivery of the housing strategy over the plan period. Furthermore, paragraph 157 states that Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.
- 1.4 In order to identify sites for allocation in the Local Plan it is necessary to clearly set how sites will be identified and then assessed in order to determine which sites are appropriate and should be taken forward as preferred options. In order to do this a Site Assessment Methodology (**Appendix 9**) has been developed. Further consideration will be given to other factors including results of public consultation to inform which sites will be selected and included as proposed site allocations in the later Draft North Norfolk Local Plan.

- 1.5 The methodology will enable the assessment of potential sites to ensure they contribute to sustainability objectives, offer the most benefit to the community and minimise any adverse impacts on the environment. Publication of the methodology and the results of it are a key stage in plan making and show clearly how the authority has considered a range of alternative options when determining its preferred development sites. The methodology will be used to:
- Assess the suitability of potential development sites for allocation including the;
 - Review of existing residential allocations not yet brought forward including employment sites.
- 1.6 In 2017 work commenced on the Housing and Economic Land Availability Assessment (part1 – residential sites). This work is a high level exercise to establish the potential capacity across the district to accommodate growth. The HELAA did not determine whether a site should be allocated or granted planning permission but identify the effective “pool” or land supply from which the Local Plan could review.
- 1.7 In taking the site assessment process forward the Council needs to assess all potential sites and make choices about which sites to allocate and for what purpose. Not all of the sites put forward to the council identified in the HELAA and the Call for Sites will fit with the spatial strategy outlined in the Local Plan or are required to meet development needs.
- 1.8 It is essential that site allocation can be justified and they are supported by a clear audit trail which demonstrates how sustainability objectives are taken into account. In addition any assessment must:
- Take account of national planning principles
 - Be transparent
 - Enable a consistent basis for comparison between sites
 - Enable unsustainable sites to be filtered out and development to contribute to making existing settlements more sustainable.

2. Site Assessment Methodology

- 2.1 The Site Assessment Methodology for site selection follows that advocated in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance.
- 2.2 Broadly the assessment will involve the following:
- Stage 1: Screening out sites that don't meet given selection criteria
 - Stage 2a: Applying Sustainability Appraisal process
 - Stage 2b: Considering further site suitability criteria
 - Stage 2c: Considering Availability and Deliverability



- 2.3 **Stage 1: Screening out sites that don't meet given selection criteria -** This excludes sites from further consideration which are subject to absolute constraints such as those being within a non-selected settlement, coastal erosions zone or within flood risk zone 3. This stage also removes sites that are not capable of delivering **5 or more dwellings, or are less than 0.25 hectares** (or 500m² of commercial floor space) as the Council will not allocate such small sites for development.
- 2.4 **Stage 2a: Applying Sustainability Appraisal process:** This measures each site against measurable site assessment criteria based on the SA Objectives and the SA is used to inform site selection.
- 2.5 **Stage 2b: Considering further site suitability criteria:** Sites are assessed against further suitability criteria considering the wider issues and policy context and evidence. The assessments are informed by engagement with relevant consultees such as NCC Highways which form the statutory highway authority and Anglian Water.
- 2.6 **Stage 2c: Considering Availability and Deliverability** Sites are assessed against further availability and deliverability criteria considering the wider issues and policy context and evidence.
- 2.7 It is intended that the approach will remain an iterative one. If it is identified that the emerging housing/economic strategy cannot be achieved there will be a requirement for a further review of the assumptions and methodology.

3. Work Programme

- 3.1 The intended work programme outlined below includes site visits and decisions on sites as is divided into groups of settlements which will ensure a spatial focus and allow Members to consider sites in manageable chunks. The process also allowing time to receive further information required for the more detailed assessment for the key sites.

- 3.2 The site visits will allow the Working Party to familiarise themselves with the individual sites and help inform future decisions on the identification of preferred sites that will be included within the First Draft Plan (Reg 18) Consultation.
- 3.3 The following programme of site visits and review meetings for the Working Party is suggested but this could be condensed into two sets of site visits for East and West of the District if thought preferable :

Reserve Committee Date	Working Party Date	Visiting Sites in:	Times
08/03	19/03	Hoveton, Ludham, Mundesley, Stalham	11am Depart NNDC Offices, Cromer 3pm Return NNDC Offices, Cromer
05/04	23/04	Briston, Cromer, Fakenham, Walsingham	11am Depart NNDC Offices, Cromer 3pm Return NNDC Offices, Cromer
03/05	21/05	Blakeney, Holt, Sheringham, Wells	11am Depart NNDC Offices, Cromer 3pm Return NNDC Offices, Cromer
31/05	18/06	North Walsham	11am Depart NNDC Offices, Cromer 2pm Return NNDC Offices, Cromer

4. Recommendation

That Members consider the contents of this report and the proposed site review methodology is used as a basis for future site assessment in the emerging Local Plan

That members agree the proposed methodology as a basis for future site selection and agree the proposed site visit dates.

Abbreviations

HELAA- Housing and Economic Land Availability Assessment

NNR – National Nature Reserve

SA – Sustainability Appraisal

SACs – Special Area of Conservation

SSSI - Sites of Specific Scientific Interest

SPAs – Special Protection Area

Local Plan Site Assessment Methodology

1. Introduction & Context

North Norfolk District Council is producing a new Local Plan. This new Plan reviews and updates our currently adopted Core Strategy and Site Allocations Development Plan documents and when it is adopted it will replace both of these documents and together with any Neighbourhood Plans it will become the adopted Development Plan for the District. The new Plan will cover a twenty year plan period commencing in 2016 through to 2036.

As well as identifying how much development the district needs over the Plan period (2016-2036) the Plan will also need to allocate sufficient land to meet the development requirements.

This paper explains the methodology for identifying suitable sites for residential and employment development to meet identified needs, the most suitable of which will be chosen as preferred options which will then be subject to public consultation. Further consideration will be given to other factors including the results of public consultation, any changes to national policies, and additional information that may become available to inform which sites will be selected and included as proposed site allocations in the final North Norfolk Local Plan.

The site selection methodology (SSM) takes account of relevant government policy and practice guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), respectively.

The core planning principles identified in paragraph 17 of the NPPF note that local plans “... *should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of residential and business communities...*”. Going on to state that “*Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework...*” and “*encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value...*”. In respect of plan-making, paragraph 157 states that “*Crucially, Local Plans should ... allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate*” and “*identify land where development would be inappropriate, for instance because of its environmental or historic significance*”.

The NPPG states (paragraph 11 of the Local Plans section) that where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).

Paragraph 47 of the NPPF, the Council should: “*identify... a supply of specific deliverable ... sites sufficient to provide five years [sic] worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land...*” and “*identify a supply of specific, developable ... sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15*”. The terms “*deliverable*” and “*developable*” are defined in the NPPF (at footnotes 11 and 12, respectively), in the following terms:

Finally, paragraph 152 includes the following overarching policy advice: *"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate"*. Accordingly, the process of site selection must adhere to these principles and avoid significant social, environmental, or economic harm, within the context of other policies within the NPPF.

It is essential that site allocation can be justified and is supported by a clear audit trail showing how sustainability objectives are taken into account. In addition any assessment must :

- Take account of national planning principles
- Be transparent
- Enable a consistent basis for comparison between sites
- Enable unsustainable sites to be filtered out and development to contribute to the delivery of sustainable growth

As part of the early engagement stage of the new Local Plan, a 'call for sites'; was undertaken between 18th January and 31 May 2016 to establish which sites land developers and other interested parties wished to be considered for development through the new Local Plan. Consultees on the Local Plan database were notified of this exercise and asked to fill in a form to ascertain their intentions for the land. The stage was publicised through press releases, events and on the Council's website.

A total of 308 sites were put forward for consideration for various proposed uses through the Call for Sites.

Since 31st May 2016 a number of additional sites have been put forward to the Council for consideration through the emerging Local Plan by land owners and developers prior to the start of the assessment process.

As well as land put forward through the Call for Sites. Land was also identified by the Council when undertaking the HELAA in 2016. The HELAA was an extensive survey of both existing and potential development sites with an aim to identify the overall capacity of North Norfolk to accommodate development.

Between October 2017 and February 2018 an assessment of land required for employment purposes was undertaken which offers a high level assessment of the capacity of potential and existing employment sites identified from a number of sources. This assessment forms Part 2 of the HELAA and provides the context of potential employment land supply in the district.

In accordance with the NPPF (Para 159), the HELAA was based on realistic assumptions about the availability, suitability and the likely economic viability of land ... in order to identify suitable land to meet the identified need for housing over the plan period. This is reinforced in the Planning Practice Guidance which goes on to state that:

"...Once need has been assessed, the local planning authority should prepare a Strategic

Land Availability Assessment to establish realistic assumptions about the availability suitability and the likely economic viability of land to meet the identified need over the plan period...”²

The HELAA site surveys adhere to the PPG which sets out that the following information should be recorded:

- site size, boundaries, and location;
- current land use and character;
- land uses and character of surrounding area;
- physical constraints (eg access, contamination, steep slopes, flooding, natural features of significance, location of infrastructure/utilities);
- potential environmental constraints;
- where relevant, development progress (eg ground works completed, number of units started, number of units completed);
- initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

The HELAA identified constraints on a number of sites and in July 2017, a letter was sent to developers calling for supporting evidence to be submitted to address any of the concerns raised in the HELAA.

It was not for the HELAA to determine which sites are to be allocated, as this is a matter for the Local Plan. The HELAA however forms the starting point for the identification of potential sites that could accommodate residential growth to meet the identified needs through the Local Plan.

The Council needs to assess all potential sites and make choices about which sites to allocate and for what purpose. Not all of the sites put forward to the council identified in the HELAA and the Call for Sites will fit with the emerging spatial strategy of the new Local Plan or are required to meet development needs. In the early stages of the site assessment process such sites will be discounted and will not be appraised further.

Further targeted consultation took place in December 2017 to ascertain site availability information and ownership confirmation. A letter was sent to developers and landowners of sites identified from other sources in the HELAA where availability information was not known.

2. Summary of Site Appraisal Methodology

This section explains the process used to evaluate each site and includes detailed criteria against which proposed sites will be assessed and compared. The consideration of sites needs to demonstrate that all reasonable alternatives have been assessed consistently and thoroughly.

Stage 1: Screening out sites that don't meet given selection criteria - This excludes sites from further consideration which are subject to absolute constraints such as those being within a non-selected settlement, coastal erosions zone or within flood risk zone 3. This stage also removes sites that are not capable of delivering **5 or more dwellings, or are less than 0.25 hectares (or 500m² of commercial floor space)** as the Council will not allocate such small sites for development.

Stage 2a: Applying Sustainability Appraisal process: This measures each site against measurable site assessment criteria based on the SA Objectives and the SA is used to inform site selection.

Stage 2b: Considering further site suitability criteria

Sites are assessed against further suitability criteria considering the wider issues and policy context and evidence. The assessments are informed by engagement with relevant consultees such as NCC Highways which form the statutory highway authority and Anglian Water.

Stage 2c: Considering Availability and Deliverability

Sites are assessed against further availability and deliverability criteria considering the wider issues and policy context and evidence.

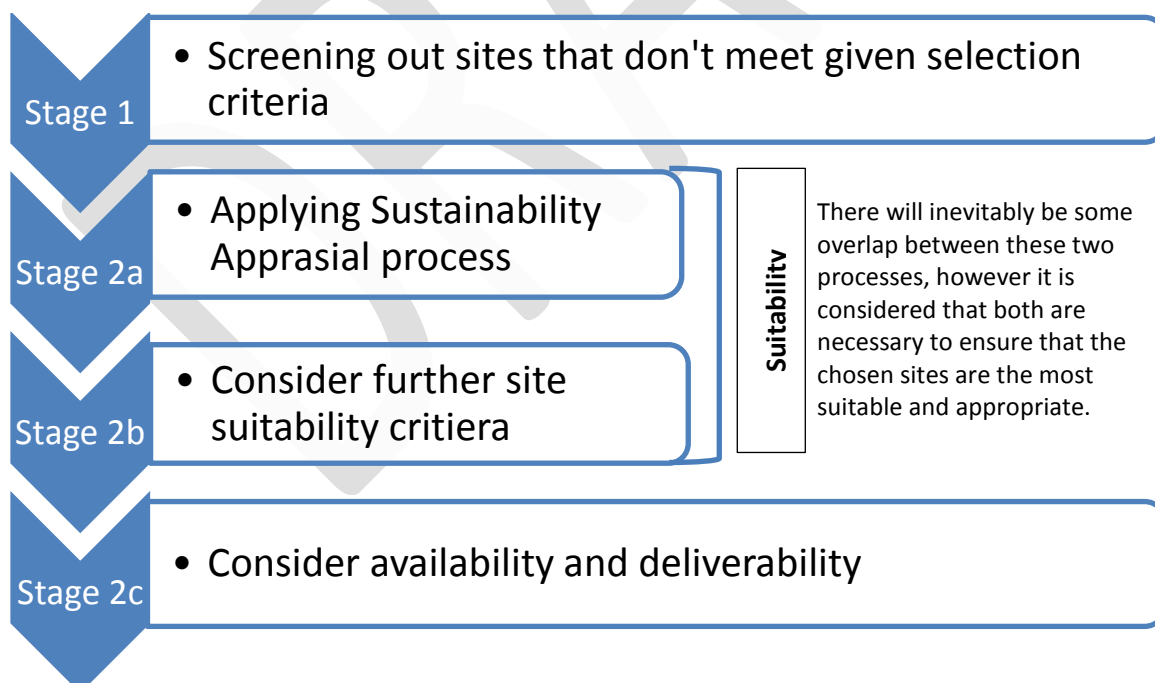


Figure 1: Stages of Site Assessment Process

3. Detailed Site Assessment Methodology

Stage 1: Screening of sites for appraisal

Starting with all sites identified from the evidence base including those considered as part the HELAA and put forward through the Call for Sites.

The scoring will comprise a 'yes' or 'no' score against the criteria indicating whether a site should be removed from the sift. If a site scores 'yes' on one or more criteria it will be removed from the sift and will not be taken forward to Stage 2.

Sites which score 'no' for all criteria will be taken forward to Stage 2.

No.	Major Policy constraint	Justification for major policy constraint
1	<p>Remove sites where no part of the site is well related to a selected settlement</p> <p>Removal of sites in designated residential areas which do not require allocation in order to be developed.</p>	<p>The NPPF contains a presumption in favour of sustainable development (paragraph 14). The core planning principles identify as part of this that planning should <i>“take account of the different roles and character of different areas promoting the vitality of our main urban areas, protecting Green Belts around them, recognising the intrinsic character and beauty of the countryside...”</i> and <i>“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”</i>.</p> <p>The NPPF therefore indicates a preference for development to be located in areas which can access services and facilities. Reflecting this, the council has identified settlements in North Norfolk which are identified as more suitable for development.</p>
2	<p>Discount sites where it is known they are no longer available</p>	<p>A site is normally considered available, based on the best information available, if the site is in the ownership of a developer or landowner who has expressed an intention to develop or sell land for development. This was ascertained primarily through the Call for Sites process, but also through further targeted consultation towards the end of 2017 with developers and landowners of sites identified from other sources through the HELAA.</p> <p>Sites with unresolved ownership problems such as multiple ownerships with no agreements, ransom strips, tenancies and covenants were not considered available unless there was a reasonable prospect the constraints can be overcome.</p> <p>The NPPF (Paragraph 47) states that planning authorities should <i>“identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged”</i>.</p>
3	Discounted Sites not	The Settlement Hierarchy/Spatial Strategy identifies those

	capable of delivering 5 or more dwellings, or are less than 0.25 hectares (or 500m² of commercial floor space) in size	<p>settlements where new development will be focussed. Sites within those settlements that are not capable of delivering 5 or more dwellings and or less than 0.25 hectares in size were not considered further.</p> <p>The PPG states that: <i>“Plan makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate. The assessment should consider all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. Where appropriate, plan makers may wish to consider alternative site size thresholds”.</i></p>
4	Remove sites entirely within Flood Risk Zone 3b.	<p>Paragraph 100 of the NPPF states that <i>“inappropriate development in areas of risk of flooding should be avoided by directing development away from areas of highest risk...”</i> and then sets out that the Sequential Test and if necessary the Exceptions Test should be applied. Table 3 (flood risk vulnerability and flood zone ‘compatibility’) in the PPG provides further guidance on flood zones including where development may be appropriate.</p> <p>It confirms that with the exception of essential infrastructure (where the Exception Test would need to be applied) and water compatible uses, other uses should not be permitted in Zone 3b. The Strategic Flood Risk Assessment will provide the basis for the identification of the flood zone extents and for applying any requirement for the Sequential and or Exception Tests.</p>
5	Remove sites which are fully within nationally and internationally designated sites of importance for biodiversity. Including SACs, SPAs, Ramsar sites or within SSSI , NNR and Ancient Woodland.	<p>Sites were excluded from the HELAA if they fell within these designated areas, as it would contravene with national planning policy and/or legislation.</p> <p>Paragraph 109, bullet 3, of the NPPF confirms that the planning system should contribute to <i>“minimising impacts on biodiversity and providing net gains in biodiversity where possible.../”</i></p> <p>Paragraph 110 goes on to confirm that <i>“Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.”</i></p> <p>The sites falling in these designated areas were removed on the basis that there were adequate alternative sites elsewhere as identified through the HELAA.</p>
8	Remove sites within Coastal Erosion Constraint Area (100 year Shoreline Management Plan line).	<p>The NPPF states that <i>“A Coastal Change Management Area will only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change. And that only “time-limited development, such as those requiring a coastal location and providing substantial economic and social benefits may be appropriate.”</i> And it goes on to state that; <i>“Permanent new residential development will not be appropriate within a coastal change management area”.</i></p>

Having excluded these types of sites, all remaining options progress to Stage 2.

Stage 2a: Sustainability Appraisal

A Sustainability Appraisal of the potential sites further informed the site selection process. Following consultation on the SA Scoping Report the Interim SA Scoping Report sets out the Sustainability Objectives and SA Framework used to assess sites covering three main themes; social, economic and environmental.

The SA Framework scores sites as having significant, moderate contribution, neutral impact or moderate, significant impact against each site specific question, with an overall summary of each indicator and an overall conclusion.

A RAG rating system identifies those sites with most dark green (++) and least red scores (--) contributing significantly towards the Sustainability Objectives and considered the most suitable. In order to fully assess the sites in terms of their suitability an element of planning judgement is required. Different weight may be given to each of the criteria reflecting the characteristics of the sites being assessed. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site is documented in the conclusions. The Sustainability documents form part of the consultation process.

	Existing SA wording	New emerging wording
++	Contributes significantly towards Sustainability Objectives	Likely strong positive effect
+	Contributes moderately towards Sustainability Objectives	Likely positive effect
0	Neutral impact	Neutral/no effect
~		Mixed effects
-	Detracts moderately from Sustainability Objectives	Likely adverse effect
--	Detracts significantly from Sustainability Objectives	Likely strong adverse effect
?	Uncertain effect	Uncertain effect

Stage 2b: Additional Site Selection

It is important that site selection is not based solely on measurable criteria. Using the SA criteria alone would omit consideration of wider issues that are difficult to quantify but important in the decision making process. It is therefore for this stage to consider sites through a more detailed site selection process.

The process of site selection is undertaken in the planning strategy context and involves making professional and planning judgements to produce a portfolio of sites that would be suitable for allocation in the Local Plan.

To guide the identification of the most suitable candidate Preferred Sites, each settlement will be considered in turn. The assessment will consider the relative merits of the sites and combinations thereof and then identify the more appropriate sites.

Stage 2b is the undertaking of a more detailed assessment of sites to identify relative suitability of sites for housing and employment development. The assessment criteria are included at Appendix A, which applies a RAG rating system utilising a scale of three scores.

The criteria are grouped into the following:

- Physical Constraints
- Landscape and Townscape
- Compatibility of uses

In general, applying the RAG rating system in Appendix A, those sites with the most dark green (++) and least red scores (--) are likely to be the most suitable for allocation. However, in common with all site selection/allocation processes, the identification of candidate Preferred Site will involve an element of planning judgement, the effect of which on outcomes cannot be prejudged. It should also be noted that in exercising planning judgement different weight may be given to each of the criteria reflecting the characteristics of the sites being assessed. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.

Evidence on the initial suitability of sites is available from the Housing Land Availability Assessment (HELAA). Though this is updated and refined through the more detailed site appraisals.

Stage 2c: Deliverability

The purpose of Stage 2c is to consider the deliverability of sites. The term "*deliverable*" is defined in the NPPF (at footnote 11), in the following terms:

"To be considered deliverable, sites should be available now, 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. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans."

The key principles to be considered are whether the sites are: 'suitable', 'available' and 'achievable' as set out in the National Planning Policy Framework (NPPF). Stage 1, 2 and 3 considered the suitability of the sites and, therefore, this stage focuses on whether a site is deliverable.

Information collected from promoters Call for Sites forms have been supplemented by updated information from promoters/developers/landowners and further technical studies used to assess the sites deliverability.

The availability of sites was primarily ascertained through the Call for Sites process, but also through further targeted consultation towards the end of 2017 with developers and landowners of sites identified from other sources through the HELAA. Where up-to-date landownership information was not held by the Council, landownership searches were undertaken at HM Land Registry.

The availability and deliverability assessment criteria are included in Appendix C, which applies a RAG rating system utilising a scale of three scores. Different weight, based on planning judgement, may be given to each of the criteria reflecting the characteristics of the sites being assessed. Where this is the case, the rationale for applying different weight to the criteria in relation to a particular site will be documented.

The findings of 2b and 2c process are captured in a site proforma which informs the identification of preferred sites and where necessary provide details on form, scale, access and quantum of development where it is necessary to deliver / co ordinate specific infrastructure i.e require policy guidance on form of development to ensure infrastructure provided. Where necessary it will also provide for identified special need – elderly / promotion of a specific development type. The site proforma will include justification and clearly explain site selection decisions. Consultees and Stakeholders

In addition the site selection is informed by :

- Responses received from statutory consultees and stakeholders.
- Habitats Regulation Assessment and further stakeholder SA consultation

Statutory bodies listed as specific consultation bodies in the regulations will be consulted. This will provide general comments about the sites and provide details of any constraints facing the sites that need to be borne in mind when considering potential allocations and / or what mitigation measures may be in place should the site come forward.

These specific consultation bodies include:

- Anglian Water
- Norfolk County Council (Highways)

Where responses are received these will be summarised and included within the individual appraisal results for each site.

A separate Habitats Regulation Assessment is undertaken

The Draft and Publication Site Allocations DPD document will be subject to further assessments to assess any implications of the draft plan in terms of the Habitat Regulations and equalities impacts.

Appendix A: Site Selection Criteria

This part sets out the additional site selection criteria which will be used to assess the suitability of the sites during stage 2b of the sites assessment.

Physical Constraints

Access to Site		
Red No possibility of creating access to the site	Amber There are potential access constraints on the site, but these could be overcome through development	Green Access by all means is possible
Combination of site visit and consultee advice from the Highway Authority will be consulted to understand the access implications for sites.		

Transport and Roads		
Red Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.	Amber Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	Green Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.
The Highway Authority will be consulted to ascertain any potential cumulative impacts on the functioning of trunk roads and local roads.		

Highway Assessment Comments

Sustainable Transport		
Red Car-dependent	Amber Some sustainable transport opportunities including walking, cycling and buses.	Green Full range of sustainable transport options available from the site.

Impact on utilities infrastructure		
Red Major utilities across site	Amber Utilities require diversion infrastructure present on the site that could affect the development potential.	Green No constraints from utilities infrastructure.
Strategic utilities infrastructure include (either under or over ground) power lines, gas pipelines, water supply pipes, sewers or pumping stations.		
Utilities Capacity		
Red No available utilities capacity and no potential for improvements.	Amber No available utilities capacity but potential for improvements to facilitate capacity.	Green Sufficient utilities capacity available.

The capacity of utilities includes electricity, gas, and water supply together with the wastewater network and treatment facilities.

Contamination and ground stability		
Red Heavily contaminated and/ or has ground stability issues.	Amber The site is potentially contaminated or has potential ground stability issues that could be mitigated.	Green The site is unlikely to be contaminated and has no known ground stability issues.

Flood Risk		
Red Part of the site is within the functional flood plain (Zone 3b)	Amber The site is within flood zones 2 or 3a (taking into account climate change) and/or is within an area at high, medium or low risk from surface water flooding (including Climate Change).	Green The site is at low risk of flooding (within Zone 1).

The SFRA flood zones will be used for the purpose of this assessment.

Landscape and Townscape

Nationally and Locally Significant Landscapes		
Red Development of the site would have a detrimental impact on sensitive or other landscapes which cannot be mitigated. ¹	Amber Development of the site would have a detrimental impact on sensitive or other landscapes which could be mitigated.	Green Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on sensitive landscapes or their setting.

Townscape		
Red Development of the site would have a detrimental impact on townscapes which cannot be mitigated. ²	Amber Development of the site would have a detrimental impact on townscapes which could be mitigated.	Green Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact, on townscapes.

Biodiversity and Geodiversity		
Red Development of the site would have a detrimental impact on designated sites, protected species or ecological networks ⁱ which cannot be reasonably mitigated or compensated as	Amber Development of the site may have a detrimental impact on a designated site, protected species or ecological network ¹ but the impact could be reasonably mitigated or	Green Development of the site would not have a detrimental impact on any designated site, protected species or ecological networks ¹ .

¹ See paragraph 115/116 of the National Planning Policy Framework.

² See paragraph 116 of the National Planning Policy Framework.

appropriate.	compensated.	
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Historic Environment		
<p>Red Development of the site would cause substantial harm to a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset ⁱⁱ which cannot be reasonably mitigated.³</p>	<p>Amber Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset ⁱⁱ, but the impact could be reasonably mitigated.</p>	<p>Green Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assetsⁱⁱ.</p>

Compatibility of uses

Loss of other beneficial use		
<p>Red Development of the site would result in a loss of the existing beneficial use which is either not surplus to requirements or could not be replaced locally.</p>	<p>Amber Development of the site would result in a loss of an existing beneficial use which is surplus to requirements or could be replaced locally.</p>	<p>Green Development of the site would not result in the loss of an existing beneficial use.</p>

Compatibility with Neighbouring/Adjoining Uses		
<p>Red Neighbouring/adjoining uses to the proposed site would be incompatible with the proposed development type with no scope for mitigation.</p>	<p>Amber Development of the site could have issues of compatibility with neighbouring/adjoining uses; however, these could be reasonably mitigated.</p>	<p>Green Development would be compatible with existing and/or adjoining uses.</p>

Overall conclusions on Suitability		

³ See paragraphs 132-133 of the National Planning Policy Framework & Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Availability and Deliverability Criteria

This part sets out the availability and deliverability criteria which will be used to assess the achievability of the sites during stage 2c of the sites assessment.

Site Availability

Site Ownership		
Red Site ownership is unknown or is in multiple ownership and the other owners are either unknown, oppose the development or are promoting another conflicting scheme.	Amber Site is in multiple ownership where landowners are promoting independent schemes that are not in conflict, or working collaboratively on a scheme, and there is an agreement in place between the parties.	Green Site is in single ownership.
Existing uses		
Red Existing uses on-site where the use could cease in more than 10 years or the timescale for on-site uses ceasing is unknown.	Amber Existing uses on-site which could cease between two and 10 years.	Green There are no existing uses on-site or existing uses could cease in less than two years.
Availability		
Red Site not expected to be available for at least 10 years or site availability is not known.	Amber Site is expected to be available within 10 years.	Green Site is expected to be available within 5 years.
Overall conclusions on Availability		

Deliverability		
Red Site is not being actively marketed	Amber Site is being actively marketed for development	Green Planning Application for the site is under discussion

Overall conclusions on Deliverability

DRAFT

ⁱ Designated sites are those with national or international protection, namely:

- Special Areas of Conservation (including possible Special Areas of Conservation)
- Special Protection Areas (including potential Special Protection Areas)
- Ramsar sites (including proposed Ramsar sites)
- Sites of Specific Scientific Interest
- National Nature Reserves
- Ancient Woodland

Footnotes:

and those with regional or local protection, namely:

- Regionally Important Geological Sites
- Local Nature Reserves
- County Wildlife Sites
- County Geodiversity Sites
- Roadside Nature Reserves
- Priority habitats, veteran trees, ecological networks;
- Priority and/or legally protected species populations.

ⁱⁱ Heritage Assets are buildings, monuments, sites, landscapes and places identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest.

Designated heritage assets include:

- Listed Buildings (grade I, grade II* and grade II)
- Registered Parks and Gardens
- Scheduled Ancient Monuments
- Conservation Areas

Non-designated Heritage Assets can include locally listed buildings, non-registered parks or gardens sites with archaeological potential and sites identified as having local heritage significance in the Norfolk Historic Environment Record (HER).

Local Plan Spatial and Housing Strategies – Preparing strategies for consultation.

Summary: This report considers the options that could be taken in the new Local Plan in relation to the overarching Spatial Strategy and the Housing Strategy including the quantity of new homes in the District, their distribution and the policy approaches which could be used to manage the delivery of the required development. A Member steer is sought to inform further work.

Conclusions A number of reasonable options will need to be subject to detailed Sustainability Appraisal and public consultation before the final approach for the Local Plan is agreed. The options identified in this report are being presented for discussion and to provide a steer for further policy development.

Recommendations: **That the Working Party recommends to Cabinet that the options identified in this report are subject to further development and Sustainability Appraisal prior to public consultation and that the Council indicates that, pending this further work, its preferred/intended approaches are:**

- a) **An overarching Spatial Strategy based on three defined geographical areas (West, East and Central North Norfolk) with growth focussed around existing settlements and that the strategy recognises the specific issues facing the coast.**
- b) **A Housing Strategy which seeks to deliver not less than 9,000 dwellings over the 20 year plan period of which around 3,500-4,000 will be provided for on allocated sites, and around 2,000 (21% subject to viability) of which will be affordable, with specific provision made to address the needs of elderly people.**
- c) **A distribution of development based on a five tier settlement hierarchy (Large Growth Towns, Small Growth Towns, Service Villages, Villages and Countryside) with acceptable locations for development defined via the use of development boundaries in Growth Towns and Service Villages, designated residential areas, and specific allocations of residential land.**
- d) **The acceptance of rural building conversions to residential use across the district (a separate report will be prepared on the detail of a rural buildings policy).**
- e) **Continued application of a rural exceptions**

policy to the delivery of affordable homes and acceptance of a proportion of market housing within such schemes (a separate report will be prepared on the detailed approach to affordable homes).

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

1. Introduction

1.1 When preparing local plans the authority is subject to a number of legal and regulatory requirements. This includes specific requirements to consider a range of *reasonable* alternative approaches and subjecting these alternatives to a process of Sustainability Appraisal and public consultation before determining the final approach. It is proposed to publish the first consultation draft of the Local Plan during the summer of 2018 and as part of this consultation the Council will need to publish and seek views on the alternative options which have been considered. At this stage it is proposed that the Council should identify and seek views on reasonable options which could be considered and indicate its preferred approach as part of the consultation. The final content of the draft consultation plan will be considered further by the Working Party and Cabinet prior to formal consultation commencing. At this stage officers require a steer in relation to key elements of the emerging strategy in order that consultation documents can be prepared.

1.2 Local Plans typically include two types of policy - Strategic Policies and Development Management policies. Strategic policies are intended to set out the high level approaches which will be necessary to deliver the objectives of the plan and to set the framework which is subsequently used to prepare detailed Development Management policies. Both types of policy are material to the determination of planning applications. The new plan is likely to include Strategic Policies relating to:

The presumption in favour of sustainable development. – Required under national guidance this policy will state that the Council will support sustainable development.

Spatial Strategy for North Norfolk –Will deal with the role of towns and villages, the settlement hierarchy, protecting the countryside, approach to managing development in the coastal area, the AONB, Broads and their setting, and other high level influences on distribution and types of development. (Included in this report)

Development in the Countryside – Will specify which types of development are acceptable in the area defined as Countryside.

Housing Strategy – Deals with the number of dwellings, their distribution, type and tenure. This policy could also include high level design requirements. (Included in this report)

Economic Development Strategy- The approach to jobs, employment land and the different sectors of the local economy including retail, and tourism and perhaps health and social care if not addressed by infrastructure strategy.

Environmental Strategy- Dealing with the natural and built environment, landscape and wildlife designations, flooding and coastal erosion.

Infrastructure including transport, roads, rail, green infrastructure (open space) and possibly social infrastructure such as health and social care.

Delivery and Monitoring- approach to delivery including developer obligations, any phasing requirements and how progress will be monitored including a trajectory of expected delivery rates.

1.3 This report considers the options for both an overarching Spatial Strategy (Part A) and a Strategic Housing policy (Part B). As the overarching Spatial Strategy should include content relating to housing, the economy, the environment and society it is likely to evolve over the coming months as these matters are considered in further detail and as the other strategic policies are prepared. Examples of early drafts of both policies are included as **Appendix 10**.

2. Options and Sustainability Appraisal.

2.1 The plan making regulations require that the Authority is able to demonstrate that it has produced a sound plan which represents the most appropriate approach for addressing development needs in the district having regard to the particular characteristics of the district in terms of the three key strands of sustainability (economy, environment and society). To deliver development there may be a number of options available and the plan making process must show how *reasonable* options have been considered when arriving at the intended approaches. There is no requirement to appraise unrealistic options. As outlined above the options should be subject to public consultation and a formal process of Sustainability Appraisal.

2.2 A Sustainability Appraisal Framework report has been prepared which identifies sixteen key sustainability indicators against which the Council will appraise both the emerging policies and new site allocations (see separate report on site selection process). The details of this formal appraisal process, together with all of the evidence upon which the Council relies, will be published alongside the consultation draft of the Plan in order that those commenting on the plan can see how the Council has arrived at preferred policy approaches and site allocations. Officers have considered the options presented in this report against the identified sustainability criteria and consider that the options presented represent a reasonable range of alternatives and that the recommended 'preferred approaches' perform well against the Sustainability Framework.

2.3 The decisions being sort at this stage are to identify the range of options and an interim preferred option for consultation purposes. Officers will then prepare the detailed consultation documents and supporting material which will come back to Members for further consideration and for authority to consult. Following the consultation the Council will need to consider the representations and amend the

draft plan as appropriate and consult further prior to formal submission for independent examination.

Part A – Spatial Strategy

3. What is Spatial Strategy?

3.1 The role of a Spatial Strategy is to provide a broad indication of the overall scale, distribution and type of development (not just housing) that is planned for the district and the direction of travel in relation to high level strategic issues. It should recognise and respond to the unique characteristics of the District and be rooted in the Plan Objectives which in turn are derived from an understanding of development needs and the land use issues to be addressed. The Spatial Strategy is about places and should take account of many factors including:

- The relationship of the District with the wider area and issues which cross district Council boundaries (the duty to co-operate)
- The role played by each settlement in terms of meeting housing, employment, service and other needs.
- Local housing and other development needs which are likely to arise.
- The evidence which has been produced in relation to infrastructure capacity, retailing, flooding and so on
- The potential constraints which may impact on delivery of growth.
- The results of sustainability appraisal.
- The potential to address local issues and secure improvements.
- National planning guidance.

3.2 The Spatial Strategy need not address every issue in detail as these will be picked up in the other Strategic and Development Management policies which will be included in the plan - it is a high level statement of intent. As a minimum it is recommended that the Strategy should include content which recognises:

- That the district is very rural with few larger settlements which are widely dispersed across the district with large areas of undeveloped and sparsely developed countryside where there are limited services and that the undeveloped countryside is a defining characteristic of the district which underpins the local economy (tourism, agriculture, fishing and recreational activities) and contributes positively to quality of life and health and well-being of those that live in, and visit, the district.
- It is a coastal district with specific issues facing coastal communities.
- There are high levels of affordable housing need and high demand for homes across much of the district.
- The population is forecast to grow and get increasingly elderly.
- The area has a relatively low wage economy, low economic activity rates, and jobs growth is forecast to be limited.
- There is a high degree of environmental constraint and some parts of the district are nationally and internationally important landscapes and wildlife habitats.

3.3 The Strategy should also reflect the key requirements of national planning policy including but not limited to:

- Taking account of and managing the potential impacts of climate change.
- Reducing the need to travel, particularly by car.
- Making efficient use of resources, reducing carbon emissions, and promoting renewable energy.
- Promoting high quality inclusive design.

3.4 Where there are sensible and reasonable alternative approaches these should be considered and the most appropriate option should be identified and justified by the evidence.

4. Spatial characteristic of North Norfolk

4.1 North Norfolk is a large rural district, it has seven larger settlements (six towns and Hoveton). Three of the towns, North Walsham, Cromer, and Fakenham are larger than the remainder and provide a broader range of housing, employment, retail and other services. These three towns are located in the east, central and west of the district respectively and each serves a large separate rural hinterland with a limited degree of overlap. Cromer, Sheringham¹ and Holt form a loose cluster of towns in the central area of the district and perform some complimentary roles, for example, Holt lacks a public secondary school so pupils travel to Sheringham, whilst Cromer acts as a higher order shopping destination and centre for health care and public administration for a relatively wide area including the two adjacent towns. The three larger towns in the district are the natural focus for day to day services and facilities, local job opportunities, and provide homes for a significant proportion of the districts population (around 25% of total population). All three are accessible via the A road network and Cromer and North Walsham lie on the main line rail network providing services to Norwich and beyond. For these reasons they are considered the most 'sustainable' locations for growth in the District and the spatial strategy should reflect this.

4.2 The smaller towns all perform as local service centres but the range of services, employment, and housing opportunities is more limited and to varying degrees residents must travel elsewhere to access these.

4.3 Most of the many villages in North Norfolk are very small and contain few, if any, day to day facilities. Only Mundesley, Briston and Melton Constable (combined), Blakeney and Ludham have a reasonable range of essential² services including convenience shopping, primary school doctor's surgeries, and a limited range of other day to day facilities. As a result these villages act as service centres for adjacent communities although this role is fairly limited. Outside of these four locations there are a wide variety of villages, some are relatively large, Trunch and Wicken Green for example, whilst others are little more than small hamlets some of which could be described as remote. (**Appendix 11** – Settlement Profiles)

4.4 The district has a coastal frontage of approximately 68km stretching from Holkham in the west to Horsey in the south-east. This coastal zone offers places for

¹ By population Sheringham is a similar size to both Cromer and Fakenham but the opportunities for further growth in the town appear restricted by environmental constraint and the town has a limited employment function.

² As defined in the North Norfolk Settlement Profiles 2017.

tourism, recreation, wildlife, maritime industry and employment. It is a defining feature of the district with iconic saltmarshes, eroding cliffs, sandy beaches and resort settlements such as Cromer, Sheringham, Wells, Mundesley, and Overstrand. The full length of the coastline is either at risk from tidal flooding or subject to cliff erosion and communities face a number of issues associated with high house prices, limited services, coastal erosion and flooding, and pressures associated with tourism. Given the importance of the coast to the tourism economy, as well as biodiversity and nature conservation, of North Norfolk, it is important that the local plan includes policies to protect the coast, coastal resorts and the communities living on the coast.

4.5 Outside of the towns and larger villages North Norfolk is very rural and some communities could rightly be described as remote. The countryside, the area of Outstanding Natural Beauty, the Broads, the many designated habitats and the distinctive character of many of the settlements all contribute towards providing high quality built and natural environments many of which are nationally and internationally protected. Significant parts of the District are at risk from potential flooding and coastal erosion and these areas are not suitable for development. The evidence³ shows that each of the settlements is subject to varying degrees of development constraint including national designations such as the AONB and local deficiencies in physical and social infrastructure all of which need to be taken into account. Similarly, across the district there are also varying needs and demands for different types of development. The uniqueness of each settlement in terms of needs, demands and capacity to accommodate growth should be reflected in the strategy.

Spatial Strategy – Options for consultation.

4.6 In terms of the broad location of new development a wide variety of high level distribution options could be considered ranging from a single new settlement to accommodate most of the required growth (Option 1), expansion of existing settlements (Option 2) to a strategy of dispersed rural development (Option 3), and numerous variations of all three. In practice it is considered that the number of options is fairly limited as each option should be realistic and should take into account a number of key factors including the existing spatial characteristics of the district and the issues to be addressed. (As outlined above and summarised below): Each option can be considered against a number of questions:

What development is needed and where? – Would the option provide what is needed in terms of meeting needs for homes, jobs, facilities and services including for affordable and specialist elderly accommodation in or close to locations where it is required. For example, the needs of those requiring accommodation or jobs in Wells would not be addressed if development was focussed exclusively around North Walsham.

Where would development be sustainable? – This means taking full account of the function and character of individual settlements and the countryside, development constraints, and the capacity to accommodate growth in a sustainable way in different parts of the District. The opportunities for growth and the constraints affecting its delivery are very different in each place.

Where would development be deliverable? - Ensuring that the proposed Strategy has a realistic prospect of delivering the required growth and addressing the

³ Wide range of evidence sources including national and local designations, Settlement Profiles NNDC 2017, Infrastructure Position Statement, Strategic Flood Risk Assessment, employment land and housing capacity studies and so on.

identified issues by taking account of market conditions, development viability and the ability to address local physical and social infrastructure deficiencies including the delivery of affordable homes. Again development viability and hence deliverability is variable across the district.

4.7 Table 1 below considers each of the high level options against these questions.

Table 1 – Spatial Strategy - High level Options Appraisal.

Option	Would the option address local needs and demand?	Would the option deliver sustainable development? (see Sustainability Appraisal in Appendix 2)	Is the option likely to be deliverable?	Other factors to consider
Option 1 - New Settlement	Only in part. Building a large new settlement in one location may address housing needs and demands in one part of the District but would not address needs elsewhere.	Unlikely -Unless relatively large (8,000-10,000 dwellings) an entirely new settlement is unlikely to support the provision of a broad range of higher order services such as primary and secondary schools, health provision or locally based employment opportunities. Consequently residents would need to travel, probably by car to access such services elsewhere.	Doubtful – Urban extensions such as that proposed at Fakenham have proved to be slow to deliver and it is not clear that there is sufficient demand or capacity in the local housing market to deliver a sustainable new settlement which is likely to require very substantial investment in infrastructure.	No suitable location has been identified for such a settlement and none has been promoted via the call for sites process. Historically the Districts former Airbases have been suggested as possible locations for significant growth but all are relatively remote, are served by poor infrastructure (particularly roads and community facilities).
Option 2 - Existing settlement expansion	Yes, the need for development (housing, employment, services and facilities) relates to many parts of the district and to minimise travel these needs should be addressed locally where it is possible and sustainable to do so.	Most sustainable option if housing growth is matched by delivery of local employment, services and supporting infrastructure.	Likely to be deliverable in all parts of the district depending on infrastructure and affordable housing requirements.	Many of the districts towns are constrained and their capacity to continue to accommodate growth is restricted by issues such as coastal erosion, flooding, AONB designations and limited capacity in supporting infrastructure. The scale of growth in each location would need to consider these issues.
Option 3 - Rural dispersal	Only in part. Some housing and other needs arise in villages and some rural growth can be justified. However most needs arise in the main centres of population and should be addressed locally in order to minimise the need to travel	No, runs the risk of unacceptable impacts on character of settlements and would result in longer distance commuting to access services. Smaller scale growth is unlikely to deliver affordable homes or significant infrastructure improvements.	Doubtful - Currently little developer capacity to deliver smaller housing proposals.	Although not universal, many small communities are not supportive of expansion even when such proposals comprise local needs housing schemes. Growth in rural settlements could be delivered via Neighbourhood Planning and this opportunity could be allowed for in the Local Plan

4.8 Taken as a whole it is considered that the evidence suggests that a preferred Spatial Strategy should continue to concentrate a large proportion of future growth around the Districts towns taking account of the needs and development capacity of individual places in three separate but related geographical areas (West, Central and East). Specific consideration should also be given to issues affecting the AONB and the Coastal parts of the District which enjoy national protection and face particular issues.

5. Part B - Housing Strategy for Consultation.

5.1 It is suggested that the Strategic Housing policy should comprise three main parts dealing with the total *quantity* of dwellings required, their *distribution* across the district, and the *types* of dwellings to be provided in terms of size and tenure including the approach to dwelling affordability, elderly person's accommodation and second home ownership. The construction standards for dwellings will be addressed in policies relating to the built environment and via application of locally enhanced Building Regulations. This report considers a number of options that could be considered solely in relation to the first two parts of this strategy relating to the *quantity* of new dwellings and their potential *distribution* in the district and identifies potential approaches for further consideration and consultation. It details the various policy tools which could be used to manage the locations of future housing. Policies relating to types and tenures will be subject to separate reports when the Council has received an up dated district wide viability assessment (expected shortly).

Quantity of new homes required.

5.2 The Council is producing a single Local Plan covering the entire district with a proposed plan period commencing in 2016 and ending in 2036. National Planning advice (the NPPF) requires that development plans should provide for the quantity of homes that objectively prepared evidence concludes will be required over the proposed plan period. Current objective assessments of housing need⁴ in North Norfolk conclude that around 410 (rounded) dwellings will be required on an annual basis, equating to around 8,200 dwellings in total over the 20 years.

5.3 However, government has indicated that it intends to publish a revised approach to the way in which housing needs are assessed. This revised approach has been published for consultation but the government is yet to publish its final approach and is not expected to do so until later this year (around Sept). The approach outlined in the consultation would increase the requirement for new homes in North Norfolk to around 510 dwellings per annum, or 10,200 over the plan period. Until such time as government makes clear its intended approach there will continue to be uncertainty in relation to final housing targets which will need to be kept under review.

Sources of housing supply over the plan period.

5.4 On the date that the Plan is adopted (currently assuming this will be in 2019) part of the required housing target over the plan period 2016-2036 will have been built (around 1,600 dwellings), a further quantity will have planning permission but will not have been built (2,000 dwellings) and over the remainder of the plan period the Council can also expect a proportion of the required growth to be delivered via windfall⁵ developments. These windfall developments have historically delivered around 50% of the total completions in the District and the emerging policy context suggests there is no reason to conclude that this source of new homes will diminish. Nevertheless, recognising that windfall is an unpredictable supply and that national guidance cautions against a reliance on windfall developments, the allowance that is made for this source is likely to be modest when compared to historical delivery rates (perhaps a further 2,160 dwellings over the remaining plan period). The remainder of

⁴ The Central Norfolk Strategic Housing Market Assessment 2017

⁵ Windfall developments are those which take place in accordance with adopted policies but which are not on formally allocated development sites. These would include infill development, building conversions and dwellings delivered via the rural exceptions policy.

any target which is set will need to be provided for through site allocations⁶ in the new plan. **Table 2** explains these potential sources of supply.

⁶ The identification and release of specific development sites in locations where current adopted policies would not permit development.

Table 2. Sources of new dwellings over plan period 2016-2036

	Source of dwellings	Dwellings	Comment
A	Estimated dwellings built between 2016-2019.	1,610	Based on projected completions from the published 2017 Five Year Land Supply Statement assuming April 2019 plan adoption date.
B	Dwellings with planning permission 2019.	2,000	Estimate based on historical trend with allowance for Fakenham Urban extension which is likely to provide around 1,000 dwellings and is likely to secure planning permission during 2018
C	Windfall Allowance 2019-2036.	2,160	Annual allowance of 135 dwellings per year for period 2020-36 as per Five Year Land Supply Statement 2017. Typical sources include infill developments, rural building conversions, and affordable housing 'exceptions' developments.
D	Additional dwellings required on allocated sites 2019-2036. Allocations will include a small number of existing sites from the current Local Plan which have not progressed to planning permissions	xxxxx	Plan target minus (A+B+C) = allocations required

Consultation Options considered in relation to housing targets.

5.5 In theory a wide range of potential housing targets could be subject to public consultation. In practice the number of *reasonable* options is fairly limited as all should be based on an evidenced based approach of what is needed. The national planning policy framework is clear that Local Planning Authorities should plan to address Objectively Assessed Needs (OAN) for new homes. Authorities may only adopt housing targets below OAN if it is clear that the results of seeking to address OAN would be unsustainable growth. For example, in broad terms it could be argued that development would be unsustainable if it resulted in long distance travel (to access jobs or services), if development was likely to have unacceptable environmental impacts (as a result of flooding, landscape impact, wildlife and so on), or if the social impacts of development were likely to be undesirable (impacts on issues such as dwelling affordability, access to health care and other services). The sustainability appraisal framework is designed to assess these issues.

5.6 North Norfolk is a very large rural district, the evidence⁷ shows that there is some commuting between towns and out of the district, principally to Norwich to access jobs and higher order shopping and cultural facilities. This is particularly the case from the east of the district but taken overall the district is relatively self-contained in terms of access to jobs, facilities and services. Distances to services is variable across the area but the three larger towns (North Walsham, Cromer, and Fakenham) each serve large separate catchments in the east, central and western parts of the area and each provide a broad range of facilities, jobs and homes. There are large areas which are designated for either their landscape or wildlife value and other development constraints such as the North Sea, flood risk and coastal erosion which limit development opportunities in some locations, nevertheless, the housing capacity study⁸ demonstrates that there is no shortage of potential development sites in broadly suitable locations. In many parts of the district services such as health care and education are absent, distant or have limited capacity and housing growth here will necessitate improvements. Taking the evidence overall it is not considered that the Council could reasonably argue that it is unable to address Objectively Assessed Needs which currently stand at around 8,200 new dwellings over a twenty-year period. For these reasons it is recommended that for consultation purposes no options below 8,200 new dwellings should be considered.

5.7 It may, however, be reasonable for the authority to set a housing target above current OAN if there were good reasons to do so, for example, the setting of ambitious jobs growth targets would require an increase in dwellings to accommodate additional workers, or high levels of need for affordable homes might justify a higher overall target. As outlined above government is likely to change the way in which needs are assessed and this change could increase OAN in the District to around 10,000 dwellings over the plan period. It is suggested that this option for 10,000 dwellings and one further higher growth strategy of around 12,000 dwellings should be appraised. Further options either above or below this range are not considered to be realistic or reasonable.

5.8 **Table 3** outlines four potential consultation options ranging from 8,000 to 12,000 dwellings. It is considered that this range would encompass all reasonable options. In defining these options a number of factors have been taken into account including:

⁷ Census, Settlement Profiles 2017.

⁸ Housing and Economic Land Availability Assessment 2017 (HELAA)

- National policy requirements and a desire on behalf of government to increase the supply of homes, including the provision of affordable homes and the objective evidence of what is required.
- The consequences of growth in terms of economic, environmental, and social considerations – Sustainability Appraisal
- Deliverability in terms of availability and suitability of sites and the ability of the development industry to deliver any target.
- Other aspects of the emerging strategy in relation to the approach to the economy and the environment which may impact on the housing target and its deliverability. For example it has been assumed at this stage that given that much of the required growth results from inward migration of elderly people and the profile of the population is set to rapidly age, and given that many older residents will not be in employment, the Council will not need to apply a further uplift on housing targets for employment purposes.

Table 3 – Potential Consultation Options for dwelling target 2016-2036.

Consultation Option	Number of dwellings	Comments/Sustainability/Suitability and Deliverability.
Option A – Addressing OAN	8,000 (400 per year)	<p>The current Strategic Housing Market Assessment concludes that around 8,000 dwellings are needed. Testing a figure at, but not below, 8,000 is considered a reasonable consultation option as it would address currently assessed housing need and comply with current government advice. Such a level of growth would require new allocations for around 2,500-3,000 dwellings and there is no evidence at this stage which would suggest that such a level of growth would have unsustainable consequences or could not be accommodated in the District <u>provided</u> the Local Plan seeks to balance housing growth with the provision of employment, facilities and services, and supporting infrastructure.</p> <p>However, this figure would not comply with the proposed revised methodology for calculating housing need which is being considered by government and runs the risk that when examined the plan will be found unsound. Furthermore unless the Council is confident it could deliver at least 21% affordable homes this figure is unlikely to address the projected need for affordable dwellings in North Norfolk (the assessed need is for approx. 2,000 affordable dwellings over the plan period). The current Core Strategy aims to deliver 45% affordable homes on qualifying sites (those proposing more than 10 units) and has delivered around 18% affordable housing as a proportion of total dwellings built. To increase the supply of affordable homes the new strategy would either need to propose a higher overall target or increase the types of development which are required to provide affordable homes, or both.</p> <p>This figure would represent a continuation of the existing levels of growth with an average requirement for around 400 dwellings per year. Housing delivery rates in North Norfolk have often fallen below this requirement particularly when larger development sites were not available and as a consequence maintaining a five year land supply has been difficult.</p>
Option B	9,000	The OAN figure of 8,000 dwellings (option A) represents the total number of dwellings which are likely to be required

AON plus further affordability uplift		<p>and it incorporates allowances for various factors including a modest uplift above the number required to address just population growth. However as outlined above if set at 8,000 there is a risk that the target would fail to deliver sufficient affordable homes to address existing and newly arising needs. This risk is modest particularly if a larger proportion of total development is planned on larger sites as such sites typically deliver more affordable homes. Nevertheless some further modest uplift to help address affordable housing requirements could be justified.</p> <p>A figure of 9,000 dwellings would require the construction of an average of 450 dwellings per year which has been achieved in the District only in recent years when larger site allocations have been available. At this figure maintaining a five year land supply is likely to be challenging particularly in the early years of the new plan period until such time as new allocations start to deliver development.</p>
Option C – Substantial affordability uplift	10,000 (500 per year)	<p>This seems likely to be required by government under the new approach to housing need assessment. This figure is around 100 dwellings per year higher than adopted targets in the Core Strategy and has proved to be very difficult to deliver notwithstanding the availability of development sites in the district. Set at this level the Local Plan would need to allocate new sites for around 4,500 dwellings over the 20 year plan period. Allocations of this scale would require substantial releases of land around two or three of the Districts towns (see Table 4) and/or a more permissive approach to rural development than the current Core Strategy.</p> <p>Under this scenario because a higher quantity of growth would inevitably take place on larger allocated sites there is likely to be a greater likelihood that the Council will be able to make a more substantial contribution towards addressing affordable housing needs.</p> <p>Based on recent delivery rates during a period when market conditions are said to be good and a large number of bigger development sites have been available and under construction the industry has nevertheless routinely failed to deliver this quantity of new homes and it is not clear that the construction industry currently has the local capacity to deliver this scale of growth in the district. In such a scenario there is clearly a significant risk that the authority would struggle to show that it was able to maintain a five year land supply throughout the next plan period.</p> <p>The Council responded to the governments proposed changes to the housing needs methodology and expressed its concerns about both the impacts of an increase in numbers in terms of sustainability and deliverability and the</p>

		<p>process for any changes being introduced. Nevertheless to make further progress on plan preparation it would be prudent to assume that the revised requirement, or at least something similar, as a reasonable prospect of being introduced later this year and pending publication of the final approach a figure of 10,000 dwellings should be identified as a potential option in the consultation.</p>
Option D – High growth	12,000 (600 per year)	<p>This quantum of growth does not appear to be required to address identified needs and risks significant impacts in terms of sustainability considerations. It would for example necessitate new allocations for around 5,000-5,500 dwellings and would add around 25% to the total number of dwellings in the district. Furthermore there is little evidence that such a scale of growth could be delivered in North Norfolk even if sites could be identified and made available.</p> <p>However higher housing targets are not without their advantages most notably they are likely (if deliverable) to provide a greater quantum of affordable homes, may have some modest impact on house price inflation and provide the economic benefits associated with house building and can bring wider benefits in terms of delivery of associated infrastructure. For these reasons some in the development industry have argued for this level of growth.</p>

5.9 At this stage it is recommended that the Council consults on Options A, B and C and indicates that Option B (around 9,000 dwellings) is likely to be its preferred approach and that of these approximately 3,000- 3,500 will be made available on newly allocated sites.

6. Distribution of Housing (and other development types).

6.1 The distribution of housing development in the District is closely associated with, and should reflect, the agreed Spatial Strategy (Part 1 of report). If Members agree with the recommendations in Part 1, namely, that the Districts towns and larger villages should provide for the majority of growth, the Housing Strategy will need to provide a further level of detail to explain how housing growth will be distributed across individual settlements. As with other aspects of policy development it will be necessary to consider a number of reasonable alternatives and consider these alternatives via the Sustainability Appraisal process before reaching final decisions.

6.2 Table 4 outlines one potential settlement hierarchy and illustrates the scale of new housing allocations which would be required if the Council adopted each of the alternative housing targets suggested in Part 1 - 8,000, 9,000 and 10,000 dwellings. As well as housing the final hierarchy would influence the quantity and types of other developed which would be permitted. For example the higher order growth settlements (towns) would be expected to also be the focus for employment, retail, and leisure developments.

Table 4 - A potential Settlement Hierarchy and distribution of development (for illustration only)

	Qualifying criteria	Qualifying Settlements	Policy Approach - Acceptable Types of Development	Suggested Housing Numbers based on alternative growth options		
				Allocations for 2,500 dwellings (Growth Option A- 8,000 total dwellings)	Allocations for 3,500 dwellings (Preferred Growth Option B – 9,000 dwellings)	Allocations for 4,500 dwellings (Growth Option C- 10,000 dwellings)
Large Growth Town	<p>Large centres of population, broad range of day to day services including 'higher order' services. These towns will have all or most of the following:</p> <p>Primary, secondary and higher education, health care, extensive choice of convenience and comparison goods shopping, good public transport and extensive local employment opportunities. Will perform a strong role as service centre and employment provider across a wide area.</p>	North Walsham, Fakenham and Cromer.	Everything with substantial new and existing allocations based on individual town capacity assessments. Would be expected to accommodate around 50% of the all required growth provided sites are suitable and infrastructure capacity is available or can be provided.	<p>North Walsham 1,000</p> <p>Fakenham 400 in addition to 900 already allocated.</p> <p>Cromer 200</p>	<p>North Walsham – 1,500 Would require a new Primary School</p> <p>Fakenham 600 in addition to 900 already allocated.</p> <p>Cromer 500 Likely to require a new Primary School</p>	<p>North Walsham 1,900 Would require a new Primary School</p> <p>Fakenham 700 in addition to 900 already allocated.</p> <p>Cromer 700 Would require a new Primary School</p>

Small Growth Town	More limited services but nevertheless comprehensive range. At least a secondary school (with exception of Holt), large convenience store, comparison shopping and broad range of employment opportunities. At least hourly public transport to higher order settlement.	Wells, Sheringham, Holt, Stalham, Hoveton	Everything with medium/modest allocations based on capacity assessment. Expected to accommodate around 20- 30% of all growth.	Allocations probably in the 100-300 range in each if suitable sites are available in each place. Wells 100 Sheringham 100 Stalham 100 Hoveton 100 Holt 300 +Primary School	Allocations probably in the 100-300 range in each if suitable sites are available in each place. Wells 100 Sheringham 100 Stalham 100 Hoveton 100 Holt 300 +Primary School	Allocations probably in the 150-400 range in each if suitable sites are available in each place. Wells 150 Sheringham 150 Stalham 150 Hoveton 150 Holt 400 + Primary School
Service Village	Essential services including Primary School, convenience shop(s), doctor's surgery, some public transport, some local employment, and selection of some other non- essential services such as pub, church, post office, village hall. Will act as a limited service hub for other nearby villages.	Briston and Melton Constable, Mundesley, Ludham, Blakeney	Modest allocations based on capacity. Larger rural exceptions justified by local need within <u>cluster</u> of communities, infill development within a defined boundary. New allocated development sites based on capacity and site suitability with potential for slightly higher numbers in Briston and Mundesley	Briston and Mundesley – up to 50 if suitable sites can be identified. Ludham and Blakeney – up to 30 in each subject to site suitability.	Briston and Mundesley – up to 50 if suitable sites can be identified. Ludham, and Blakeney – up to 30 in each subject to site suitability.	Briston and Mundesley – up to 50 if suitable sites can be identified. Ludham, and Blakeney – up to 30 in each subject to site suitability.
Infill Village	All settlements with a Primary School or a shop and at least four secondary or desirable services. ⁹	Aldborough, Bacton, Horning ,Catfield, Overstrand, Roughton, Happisburgh, Walsingham, Corpusty ,Little Snoring, West Runton, Potter Heigham, Sutton, Weybourne, East Runton, Southrepps, Trunch, Sculthorpe, Langham, Baddersfield.	Infill determined by criteria based policy, no allocations, small mixed tenure rural exceptions justified by specific local need <u>in the specific community</u> .	Development limit to infill and rural exceptions	Development limit to infill and rural exceptions	Development limit to infill and rural exceptions

⁹ As defined in the Settlement Profiles (Village facilities assessment), North Norfolk 2017.

Countryside Policy Area	All areas outside of selected settlements including those defined as Infill villages which would remain in the countryside policy area.	All non-selected locations including the smaller villages with no/very limited services	Rural building conversions, and small affordable schemes if justified by local evidence.			
Airbases	Separate paper to be prepared dealing with the potential for development on airbases	Coltishall, West Raynham, Tattersett				
Allocation Totals				Approx 2,500	Approx 3,500	Approx 4,500

7. Conclusions.

7.1 All of the options relating to quantity and distribution of development will need to be subject to detailed Sustainability Appraisal and public consultation before the final approach for the Local Plan is agreed. The options identified in this report are being recommended for consultation purposes only and are subject to on-going review. Subject to Member endorsement Officers will prepare the Consultation Draft Plan, details of Alternative Options Considered, and supporting Sustainability Appraisal documents which will be presented to Working Party and Cabinet for approval prior to public consultation later this year.

8. Recommendations

That the Working Party recommends to Cabinet that the options identified in this report are subject to further development and Sustainability Appraisal prior to public consultation and that the Council indicates that, pending this further work, its preferred/intended approaches are:

- a. An overarching Spatial Strategy based on three defined geographical areas (West, East and Central North Norfolk) with growth focussed around existing settlements and that the strategy recognises the specific issues facing the coast.**
- b. A Housing Strategy which seeks to deliver not less than 9,000 dwellings over the 20 year plan period of which around 3,500-4,000 will be provided for on allocated sites, and around 2,000 (21% subject to viability) of which will be affordable, with specific provision made to address the needs of elderly people.**
- c. A distribution of development based on a five tier settlement hierarchy (Large Growth Towns, Small Growth Towns, Service Villages, Villages and Countryside with acceptable locations for development defined via the use of development boundaries in Growth Towns and Service Villages, designated residential areas, and specific allocations of residential land.**
- d. The acceptance of rural building conversions to residential use across the district. (a separate report will be prepared on the detail of a rural buildings policy).**
- e. Continued application of a rural exceptions policy to the delivery of affordable homes and acceptance of a proportion of market housing within such schemes.(a separate report will be prepared on the detailed approach to affordable homes)**

9. Legal Implications and Risks

9.1 The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches must complete Sustainability Appraisal, consider reasonable alternatives, and publish these for consultation before determining its final approach. Consultation on the options identified in this report is designed to fulfill these requirements.

10. Financial Implications and Risks

10.1 Failure to undertake plan preparation in accordance with the regulations is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

Appendix 10 – Draft Spatial and Housing Strategy

Appendix 11 – Village Facilities Assessment.

Abbreviations

Objective Assessed Need (OAN) – A formal process used to establish how many new dwellings will be required over a local plan period. The process is evidence based and takes account of many factors including population growth, dwelling occupancy rates, vacant and second homes, market conditions and many other factors which influence the likely need for new homes.

Consultation Draft

Spatial Strategy for North Norfolk

The majority of new development¹ in North Norfolk will take place in the towns and larger villages, dependent on their local housing needs, their role as employment, retail and service centres and particular environmental and infrastructure constraints. New development sites will be allocated in the defined selected settlements in accordance with the following hierarchy:

- Cromer, Fakenham and North Walsham are defined as **Large Growth Towns** where the majority of new commercial and residential development will take place (at least 50% of all development).
- Holt, Hoveton, Sheringham, Stalham and Wells-next-the-Sea are defined as **Small Growth Towns** in which a more limited amount of additional development will be accommodated (approximately 25%)

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

A lesser amount of new development will be focused on Briston and Melton Constable, Mundesley, Ludham, and Blakeney, recognising their role as **Service Villages** and to support rural sustainability.

Outside of these selected settlements small scale infill, brownfield developments, affordable homes, community facilities and services will be permitted in locations within and well related to **Infill Villages**.

CoastAONB... BROADS – No significant development.

The Countryside

The rest of North Norfolk, including all settlements not listed above, will be designated as **Countryside** and development will be restricted to particular types of development to support the rural economy, meet affordable housing needs and provide renewable energy.

Development will contribute positively to the character of the area through careful attention to density, scale, layout, form, context and sense of place.

Between 2016 and 2036 at least **9,000** net additional dwellings will be built in the District. The Council will aim to ensure that a minimum of 21% (final figure subject to viability evidence) of these are provided as affordable homes in a mix of tenures which seeks to address local needs. Specific provision will be made for homes suitable for elderly person's accommodation including for those in need of care. Newly arising needs for gypsy and traveller's accommodation for both permanent and transit pitches will be addressed in full in sustainable locations.

High quality, well designed, and resource¹ efficient new dwellings will be provided to extend choice and address needs in a broad range of sustainable locations across the west, central and eastern parts of the District. Priority will be given to the development of suitably located previously developed sites including the re-use of existing structurally sound buildings for residential purposes.

Content relating to tenure types, affordability, elderly persons accommodation and occupancy controls to be added.

The distribution of new dwellings will be broadly as follows:

Potential Location of Development based on preferred target of 9,000 dwellings

Source/Location	Number of dwellings			
	Estimated Commitment ¹	Windfall 2019-2036	New Allocations ¹	Totals
West Area				
Fakenham			600	
Wells			100	
Blakeney			30	
Central Area				
Cromer			500	
Holt			300	
Sheringham			100	
Briston/Melton Constable			50	
East Area				
North Walsham			1,500	
Stalham			100	
Hoveton			100	
Mundesley			50	
Ludham			30	
Outside of selected settlements			0	
Whole District				
Totals	3,610	2,160	3,460	9,230