

| <b>Adoption of the North Norfolk Local Plan 2024-2040</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Executive Summary</b>                                  | <p>The purpose of this report is to progress the North Norfolk Local Plan 2024-2040 to adoption in order to provide the Council with an up-to-date Local Plan. The Plan has undergone independent examination and found to be sound and legally compliant, with the Inspector concluding that the Plan provides an appropriate basis for the planning of the District provided that a number of Main Modifications are made to it.</p> <p>The Local Plan contains multiple policies underpinned by the principle of delivering sustainable and climate-resilient development to secure a better quality of life for everyone, now and for future generations. All policies within the Plan contribute towards achieving these aims, including those promoting the sustainable location of new homes, jobs and economic growth; the conservation and enhancement of the natural environment and built environment; improved infrastructure and renewable energy; the provision of green spaces and the creation of balanced, healthy communities.</p> <p>This report sets out the process followed; summarises the Inspector's report and main modifications required, provides an overview of the Plan and reviews the options available for the Council. The appendices contain the Inspectors report, Main Modification schedule, the updated Local Plan containing the necessary modifications, the updated policies map (link), Sustainability Appraisal Adoption Statement, (incorporating HRA adoption statement) updated Equalities Impact Assessment, and a presentation providing an overview of the Local Plan.</p> |
| <b>Options considered</b>                                 | <ol style="list-style-type: none"> <li>1. Adopt the Local Plan (as modified)</li> <li>2. Not adopt the Local Plan.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Consultation(s)</b>                                    | <p>The Local Plan production has been informed by direct member engagement through the Planning Policy &amp; Built Heritage Working Party, with key decisions endorsed by Cabinet. Each relevant stage has been subject to public and statutory consultation, and feedback has informed its development.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Recommendations</b>                                    | <p><b>That Cabinet:</b></p> <ol style="list-style-type: none"> <li><b>1) Notes the outcome of the Inspector's Report into the examination of the North Norfolk Local Plan, dated 31 October 2025 (Appendix 1 &amp; 2);</b></li> <li><b>2) Recommends that the Council adopts the modified Local Plan which incorporates the Main Modifications as the appropriate basis for the future planning of the whole District (Appendix 3);</b></li> <li><b>3) Notes that all policies of the North Norfolk Core Strategy 2008 and the Site Allocations; Development Plan Document 2011 (the current Local Plan) will be superseded by the new</b></li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|                                    | <p><b>Local Plan upon adoption. This is subject to the provisions of paragraph 9.3 of this report that: ‘Upon adoption there is a six-week window under section 113 of the Planning and Compulsory Purchase Act 2004 during which an aggrieved party can challenge the decision to adopt a Local Plan on legal and procedural grounds’</b></p> <p><b>4) Delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the North Norfolk Local Plan part of the Adopted Development Plan for North Norfolk;</b></p> <p><b>5) Delegates authority to the Planning Policy Manager to make any further necessary non-material modifications and any further updates to the Policies Map as required.</b></p> |
| <b>Reasons for recommendations</b> | <p>It is a legal requirement to have an up-to-date Local Plan for the Council’s administrative area and to undertake review at least every five years. The updated North Norfolk Local Plan has been guided by a balanced cross-party working party, undergone formal rounds of consultation and independent examination by a Planning Inspector, and has been found “sound” subject to the inclusion of modifications and provides an appropriate basis for the planning of the District. The Plan provides the Council’s Strategic Planning Framework and is required in order to ensure the Council has an up-to-date Local Plan in place from which planning decisions are made.</p>                                                                                   |
| <b>Background papers</b>           | <p>The examination &amp; submissions documents, along with previous stages of consultation, evidence base and supporting documents can be found in the published Local Plan <a href="#">Examination Library</a></p> <p>The <a href="#">Local Development Scheme</a> sets out the Council’s programme for preparing and adoption of the Local Plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Wards affected</b>    | All                                                                                                                                        |
| <b>Cabinet member(s)</b> | Cllr Andrew Brown                                                                                                                          |
| <b>Contact Officer</b>   | Iain Withington, Planning Policy Manager<br><a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a> |

| <b>Links to key documents:</b> |                                                                                                                                                                                                                        |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Corporate Plan:                | Delivering the Local Plan remains a key commitment and component part of the Corporate Plan covering all five themes: Our Greener Future, Developing Our Communities, Meeting Our Housing Need, Investing in Our Local |

|                                       |                                                                                                                                                              |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       | Economy and Infrastructure and A strong, Responsible & Accountable Council                                                                                   |
| Medium Term Financial Strategy (MTFS) | N/A                                                                                                                                                          |
| Council Policies & Strategies         | The Local Plan sets the Council's Planning and decision-making framework. Adoption of which will replace the current Core Strategy and Site Allocations DPD. |

| Corporate Governance:                              |                                         |
|----------------------------------------------------|-----------------------------------------|
| Is this a key decision                             | No                                      |
| Has the public interest test been applied          | No                                      |
| Details of any previous decision(s) on this matter | None that are specific to the adoption. |

## 1. Purpose of the report

- 1.1 The purpose of this report is to progress the North Norfolk Local Plan 2024 – 2040 to adoption in order to provide the Council with an up-to-date Local Plan. This will then be used to inform development proposals and in the planning decision-making process. There is a clear expectation in national policy that the Council proceeds at speed with adopting the Local Plan now that it has been found sound, and in accordance with the published Local Development Scheme, LDS.

## 2. Introduction & Background

- 2.1 The production of the Local Plan is a statutory requirement and will help the Council to meet its strategic and corporate priorities. Once adopted, the Local Plan will form part of the development plan and enable the Council to provide for the identified needs of the District.

- 2.2 Local Plans set the development framework for an area, must be forward looking and cover a minimum 15-year period from adoption. To do this, they

- Contain planning policies which are the basis for deciding whether to approve planning applications;
- Set out the strategic policies of the district that neighbourhood plans need to be in “general conformity” with;
- Set the spatial strategy and sustainable distribution of growth across the District;
- Allocate sites for development, including for homes and employment, which accord with evidential needs and opportunities;
- Facilitate the delivery necessary for local infrastructure, such as open space, health and community facilities, education and highways;
- Protect, and enhance the natural, built and historic environments;
- Set an appropriate framework to respond to climate change.

- 2.3 National policy requires local planning authorities to adopt their Local Plan under the current and existing system by December 2026, with a key submission deadline of 12<sup>th</sup> March 2025. Plans submitted after this date would need to comply with the new plan-making system introduced by the Levelling Up and Regeneration Act 2023<sup>1</sup>, address matters detailed in the updated National Planning Policy Framework (NPPF) December 2024 and accord with further process guidance yet to be published.
- 2.4 Preparation of the Local Plan started in 2016 and has followed a number of key stages as set out below. Throughout its production it has been informed by Corporate Plan priorities as well as national planning policy. The main member engagement and guidance has been through the politically balanced Planning Policy and Built Heritage Working Party (PPBHWP) with each recommendation(s) being reviewed and endorsed through subsequent Cabinet meetings.

#### Key stages of Plan making

| Stage                             | Description                                                                                                                                                                                                                                                                                                                                                       | Date                |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|
| First Regulation 18 Consultation  | Subjects of the Local Plan                                                                                                                                                                                                                                                                                                                                        | August 2015         |
| Evidence Gathering                | Call for Sites, Housing & Economic Land Availability Assessment (HELAA), Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) Scoping, Open Space Review, Strategic Housing Market Assessment (SHMA), Retail & Town Centre Study, Economic Growth, Landscape Character / Landscape Sensitivity Assessment, Strategic Flood Risk Assessment etc |                     |
| Second Regulation 18 Consultation | First Draft Local Plan, Alternatives Considered, Interim SA & HRA                                                                                                                                                                                                                                                                                                 | May 2019            |
| Regulation 19 Consultation        | Proposed Submission Version Local Plan, SA & HRA                                                                                                                                                                                                                                                                                                                  | January 2022        |
| Regulation 22                     | Submission of Draft Local Plan, SA & HRA                                                                                                                                                                                                                                                                                                                          | May 2023            |
| Examination Hearing Sessions      | Matters & Issues (Public Hearings)                                                                                                                                                                                                                                                                                                                                | Jan-March 2024      |
| Further Consultation              | Additional / enlarged sites, additional Small Growth Villages and increased SGV growth, updated Gypsy & Traveller evidence                                                                                                                                                                                                                                        | November 2024       |
| Examination Hearing Sessions      | Further Matters & Issues (Public Hearings)                                                                                                                                                                                                                                                                                                                        | April 2025          |
| Main Modifications Consultation   | Schedule of Main Modifications + Policies Map Changes                                                                                                                                                                                                                                                                                                             | September 2025      |
| Examination Conclusion            | Receipt of Inspectors Final Report                                                                                                                                                                                                                                                                                                                                | Oct / November 2025 |

<sup>1</sup> New local plan making core features include, 30-month timetable, early engagement & three Gateway Assessments, Digital, interactive formats new cooperation methods and updated environmental processes.

- 2.5 The Plan was submitted to the Secretary of State for examination in May 2023 and David Reed BSc, Dip TP DMS MRTPI from the Planning Inspectorate was appointed as the independent examiner. At the time, the July 2021 version of the NPPF was extant, and as such, under paragraph 234(b) of the subsequent revised NPPF December 2024, the Plan has been examined under transitional arrangements and the earlier NPPF version. The key examination tasks are to establish whether the Plan is “sound” as prescribed in the NPPF and whether in preparation it fulfils the necessary legal requirements such as the duty to co-operate, public sector equality duty, and is informed by an iterative Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA). To be sound, paragraph 35 of the NPPF<sup>2</sup> makes it clear that a Local Plan should be positively prepared, justified, effective and consistent with national policy:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs<sup>3</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 2.6 Initial hearings were held between January and March 2024 on the Plan as submitted and following the publication of detailed matters and issues statements by the Council. Following these, two fundamental issues were identified by the Inspector in respect of soundness. These issues revolved around a shortfall in housing provision due in part by the required four-year extension of the Plan to 2040 and the Council’s reliance on a deviation away from the “standard methodology” used in calculating housing need. It was also determined that the Gypsy and Travellers need assessment was out of date following the change in the legal definition shortly before the first hearings.
- 2.7 To address these issues the Council prepared an Action Plan which was approved by Cabinet on 4th November 2024 having first been recommended by the Council’s Planning Policy & Built Heritage Working Party the previous month. The Council consulted on these additional proposals between November and December 2024 as part of a ‘Further Consultation’, and, following receipt of feedback, the proposals were considered by the Inspector through the second round of hearings held in April 2025.

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<sup>2</sup> NPPF July 2021

<sup>3</sup> To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition, any needs that cannot be met within neighbouring areas should also be taken into account. NPPF 2021 para 60

- 2.8 The resultant schedule of Main Modifications covering both hearings underwent public consultation during August and September 2025. Representations received were submitted to the Inspector for his consideration and having been considered, the Council received the Inspector's Report on 31 October 2025.

### **3. Inspectors Report and Main Modifications**

- 3.1 The report, attached as **Appendix 1**, concludes that the North Norfolk Local Plan provides an appropriate basis for the planning of the District, provided that the modifications recommended by the Inspector are made to the Plan as attached as **Appendix 2**.
- 3.2 The report has had due regard to areas of legal compliance with the Inspector, concluding that the Council has *maximised the effectiveness* of the duty to co-operate through the Norfolk Strategic Framework, confirming that the Plan meets the necessary legal compliance tests. In particular, the Council has developed and used a shared evidence base, not least in the approach to assessing housing and employment sites, leading on a joint Strategic Flood Risk Assessment (SFRA), the joint Norfolk-wide recreation mitigation strategy, the Norfolk Environmental Credit Scheme that addresses nutrient neutrality, the Planning In Health Protocol, and jointly developing policies to tackle climate change.
- 3.3 The Duty requires the Council to demonstrate that engagement on cross-boundary issues has been undertaken where necessary on a constructive and actively on-going basis. In relation to growth at North Walsham the Inspector is satisfied that the Council also worked constructively with Broadland District Council and Norfolk County Council in the commission of transport evidence, assessing the implications of increased traffic flow on the B1150 through Coltishall & Horstead and drawing up mitigation measures and agreeing suitable policy wording for the inclusion in the site allocation policy contained in the Local Plan.
- 3.4 In relation to other legal tests the Inspector is satisfied that the Sustainability Appraisal process undertaken alongside the Plan has adequately assessed the Local Plan to establish, when judged against reasonable alternatives, that the Plan will help to achieve relevant environmental, economic and social objectives. It is also concluded that the legal duty to undertake Appropriate Assessment in accordance with the Habitat Regulations has been met. Taking into account the Council's Equality Impact Assessment of the Plan, the Inspector concludes that the Plan has had due regard to the Equalities Act 2010 through the examination.
- 3.5 To complete the process this report is accompanied by the Sustainability Appraisal & Habitat Regulations Assessment Adoption Statement and updated Equalities Impact Assessment, as set out in Appendices 5 and 6.
- 3.6 In total, 68 main modifications to the submitted Plan are required as detailed in **Appendix 2**. Comprehensive reasoning for each modification is contained in the Inspector's Report. The main modifications can be summarised as follows:
- Changing the plan period to 2024-2040;
  - Amending Policy CC13 to ensure development demonstrates nutrient neutrality in critical river catchments;

- Increasing the housing requirement to be delivered by the plan to 8,900 minimum requirements 557dpa;
- Allocating further housing sites consistent with the spatial strategy of the plan and amending the policy requirements for allocated sites as necessary;
- Amending the strategy for strategic growth at North Walsham and clarifying the requirements for on and off-site infrastructure;
- Deletion of allocation W07/1 at Wells-next-the-Sea;
- Increasing the number of Small Growth Villages, their potential for growth and clarifying the criteria for considering schemes;
- Amending Policy HOU2 to clarify the mix of homes required on housing sites;
- Updating Policy HOU5 for Gypsy, Traveller and Travelling Showpeople's Accommodation to reflect the latest evidence;
- Updating the housing supply figures and housing trajectory to reflect the evidence;
- Deletion of employment allocations H27/1 at Holt and NW52 at North Walsham;
- Updating the overall employment land provision in the Plan;
- Identifying the strategic policies of the Plan;
- Other modifications to the policies of the Plan to ensure that it is positively prepared, justified, effective and consistent with national policy.

3.7 To be clear, the Council can only adopt the Plan if the modifications are incorporated. It is the Inspector's considered view that they are necessary to make the Plan sound.

3.8 Given the changes in national policy and the updated NPPF, the Inspector brings to the Council's attention in his report the circumstances that the Local Planning Authority (LPA) will be expected to begin work on a new Local Plan under the revised plan making system. He advises that this should be as soon as the relevant provisions as set out in the Levelling up and Regeneration Act 2023 reforms are brought into place. Paragraph 236 of the December 2024 NPPF states:

3.9 *Where paragraph 234b applies (i.e. the plan has been submitted for examination under Regulation 22 on or before 12 March 2025), if the housing requirement in the plan to be adopted meets less than 80% of local housing need<sup>4</sup> the local planning authority will be expected to begin work on a new plan, under the revised plan-making system provided for under the Levelling Up and Regeneration Act 2023 (as soon as the relevant provisions are brought into force in 2025), in order to address the shortfall in housing need.*

3.10 The Council's updated housing need figures under the revised NPPF equates to an annual requirement of 932 dwellings. The approach of 557dpa is the equivalent of approximately 60% when compared to the new requirement and falls short of the 80% threshold. As such, the Council is required to begin work on a new Plan.

## 4. North Norfolk Local Plan Overview

4.1 Overall, the Plan makes provision for delivering on the Councils' corporate objectives. The overarching vision is to contribute to the achievement of climate resilient sustainable growth, enabling growth in the context of mitigation and

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<sup>4</sup> Calculated using the revised standard method in national planning practice guidance, published on 12 December 2024.

adaptation to climate change whilst conserving & enhancing the natural environment, improving connectivity, open space and health.

4.2 It does this by providing the planning framework through a set of strategic and non-strategic policies across five themed policy areas,

- Delivering Climate Resilient Sustainable Growth
- Delivering Well Connected, Healthy Communities
- Protecting Character, Conserving & Enhancing the Natural Environment
- Meeting Accommodation Needs
- Enabling Economic Growth

Followed by a series of specific site allocations in line with the spatial hierarchy. The Plan guides how land will be used, what types of development will take place, and how the natural and built environment will be protected and enhanced. The Local Plan will form part of the statutory development plan for the District, alongside any 'made' Neighbourhood Plans.

4.3 The Plan as modified makes provision for 9,880 dwellings against a requirement of 8,900 or 557 dwellings per annum. (including a minimum of 2,000 affordable homes). The additional numbers provide a small contingency in order to account for any potential slippage in approvals, delivery and changes in market conditions. Site allocations with the Plan are expected to deliver 4,584 of these. The 34 identified Small Growth Villages, through market-led approaches, are expected to deliver a further 924 over the Plan period. Windfall development such as conversions, permitted development rights, rural exception sites, speculative development that accords with the spatial strategy, as well as a new policy SS3, Community Led Development as long as it has the support of the local community, will account for a further 2,500 dwellings. This is approximately the equivalent of 135 dpa in the first five years of the Plan, then 180dpa from 2029/30. The remaining balance is accounted for through existing permissions and completions.

4.4 In terms of employment growth, the Plan identifies 63 hectares of available designated employment land against a requirement of 1.6 hectares per annum based on past delivery rates. Policy E3 also sets out a flexible policy approach supporting proposals at the local level outside of designated employment zones provided that proposals are suitable and well related to the built-up area and accord with the spatial strategy and other policies of the Plan.

4.5 The growth is predicated on compliance with the spatial strategy, which identifies:

- Three 'Large Growth Towns': Cromer, Fakenham and North Walsham
- Five 'Small Growth Towns': Holt, Hoveton, Sheringham, Stalham, Wells-next-the Sea
- Four 'Large Growth Villages': Blakeney, Briston, Ludham & Mundesley
- Thirty-Four 'Small Growth Villages'
- Countryside policy area

4.6 The strategy promotes a number of site allocations through Policy DS1 in the top three tiers of the settlement hierarchy, as identified in Policy SS1, where a reasonable prospect of delivery has been evidenced. These site allocations are expected to deliver a minimum of 4,584 dwellings over the Plan period. In particular, a sustainable urban extension to North Walsham is proposed. This will deliver 1,270 dwellings in the Plan period and a further 730 expected beyond that - a total of 2,000 dwellings. Included in the site allocation policy is



a requirement for a new western link road linking Norwich Road and Cromer Road along with off-site road, pedestrian & cycle improvements and further junction and safety improvements including improvements to Aylsham Road and the B1150 / Mill Road / B1154 junction at Coltishall, significant areas of open space and landscaping, 7 hectares of employment land and a new two-form entry primary school. A further 327 dwellings, plus a further 300 dwellings beyond 2040, are allocated to the north of Fakenham to be delivered towards the end of the Plan period following the delivery of the expected 950 homes already granted planning permission as a result of the previous Plan's allocation. The strategy also facilitates growth in the remaining selected growth settlements with the aim of ensuring that identified needs for new homes, jobs, open space and supporting infrastructure are delivered in ways that are consistent with protecting the unique role and character of each settlement. In each of the settlements where development is proposed, a settlement boundary has been defined. These boundaries are shown on the Policies Map.

- 4.7 Action on climate change is embedded throughout this Local Plan and is an integral part of many policies. Collectively, the Plan sets a framework on how climate change could and should be considered in order to achieve national and local targets and climate resilient sustainable development. Addressing climate change is, however, a shared responsibility, and the challenges are not just to develop to minimum targets but to seek a step change and encourage a shift in emphasis in development considerations. Policies include sustainable construction linked to building regulations, which are anticipated to be updated in a progressive way through the Government's 'Future Homes Standard'. However, although these have been consulted upon, they have not yet been updated. Other policies in this section cover areas of coastal management and set the policy framework for coastal change adaptation, otherwise known as 'rollback'. Policy CC10 brings into the Local Plan the now national approach to Biodiversity Net Gain, while other policies seek appropriate provision of electric vehicle charging infrastructure in development, address nutrient neutrality, the protection of trees, hedgerows & woodland, and how flood risk and surface water drainage should be taken into account.
- 4.8 In terms of delivering on well-connected and healthy communities, policies enact the use of the Planning in Health Protocol. The Protocol presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Council Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly consult to ensure that health considerations are adequately accounted for in planning applications and subsequent decisions. It provides a practical tool to assist the Council, developers and the health sector organisations to participate in discussions and to consider the merits of different sites and proposals against public health related issues. Other policies in this section include those that relate to the provision of open space against minimum standards, the protection of existing designated and undesignated open spaces, the setting out of viability considerations, the requirements for fibre to premises, the safeguarding policies around former railway track beds and existing health care facilities on designated health care campuses.
- 4.9 The strategy also promotes the protection and enhancement of the built and natural environment and local landscapes. This is approached through a suite of policies around consideration of landscape character types within and outside the nationally designated landscapes, heritage and consideration of high-quality design.
- 4.10 The Local Plan promotes a proactive approach to housing delivery designed to deliver homes that meet the identified needs of the District. In particular, Policy HOU2 - Delivering the Right Mix of Homes, ensures that the type, size and

tenure of homes provided closely matches the existing predicted future needs of the local population. For market housing, the policy identifies that in the main not less than 50% of homes should be two or three-bedroom properties in a mix comprising of approximately 20% two-bed and 80% three-bed. In the delivery of the minimum requirement of 2,000 affordable homes, the policy also sets two affordable housing zones which require the delivery of at least 15% or 35% affordable housing, comprising 25% intermediate housing with the remainder being rented, in a mix comprising one, two and three-bedroomed dwellings, with the majority as two-bed properties. With North Norfolk having one of the highest over 65's population as a proportion of its total population, and the fastest growing age cohort, Policy HOU2 also includes the requirement for specialist elderly/care provision as well as setting out the Council's approach to self-build properties.

- 4.11 The Plan addresses other areas of housing delivery to provide for different circumstances and has a suite of policies covering rural exception sites, replacement dwellings, essential rural workers accommodation and a criteria approach to assessing proposals for Gypsy and Travellers. Two new policies, HOU8 and HOU9, cover the introduction of accessible & adaptable homes and the use of the prescribed minimum space standards. These policies are based on detailed evidence of an under-supply and growing needs, which work together to ensure homes are built to minimum overall sizes and sets requirements around internal room sizes in relation to their function as well as ensuring adequate storage is built in. In the case of adaptable homes, the policy sets out that homes must be constructed in a way that enables them to be easily adapted to meet the changing needs of the occupier over their lifetime, evoking the optional building regulations standards in this regard<sup>5</sup>.
- 4.12 The approach to economic activity is based on past take up rates and the most optimistic evidenced scenario but allows for significantly more employment to come forward through flexible policies addressing local provision outside designated employment sites. A suite of policies cover tourism development, including those that set out a framework to consider proposals for new, and extensions to, tourist attractions, touring caravan & camping sites and for retaining an adequate supply and mix of tourism accommodation. As such, the policies offer the opportunity to strengthen the North Norfolk economy at the same time as considering the impacts on the local environment.
- 4.13 Taken together, these measures ensure that the housing and economic needs to 2040 will be met in a sustainable manner, taking into consideration the local environment and the evolving requirements of adapting and mitigating the effects of climate change.
- 4.14 Attached in **Appendix 7** to this report is a presentation provided to Members of the PPBHP and Development Committee on 30<sup>th</sup> October 2025 and subsequently circulated to all Members on 31<sup>st</sup> October 2025. This provides a more detailed overview of the Local Plan process and its policy content.
- 4.15 The final adoption version of the Plan incorporating the Main Modifications is attached in **Appendix 3**. This version also includes some Additional Modifications. These are minor changes to the submitted Plan's supporting text that are considered necessary to ensure clarity and consistency and are modifications that are not related to soundness issues. The Council published these alongside the Main Modifications consultation schedule in August 2025. Such changes include factual updates to supporting text such as census information, references to government publications and legislation, and

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<sup>5</sup> Such standards can only be evoked at Plan review stage and must be justified and evidence.

correction of matters relating to grammar and spelling. Some further factual updates have been undertaken in addition to the Additional Modifications published in order to reflect the final outcome of the Plan examination and passage of time.

## **5. Proposals and Options**

- 5.1 **The publication of the Inspector's Report enables the Council to proceed to adoption of the North Norfolk Local Plan.** It requires the main modifications to be included in the adopted plan to make it sound. These changes are binding; a plan can only be adopted with their inclusion. The key point to note is that following the conclusion of the examination, it is not possible (by law) to make further changes to policies contained in the Local Plan or reject any of the main modifications since these have been found necessary to make the Plan sound.
- 5.2 The decision to adopt must be made by Full Council with the next meeting scheduled for 17<sup>th</sup> December 2025 following Cabinet endorsement on 1<sup>st</sup> December 2025. Adoption involves the publication of an Adoption Statement following the appropriate member decision. This is accompanied by the North Norfolk Local Plan (as amended by the Inspector's modifications), the Inspector's Report, the Sustainability Appraisal, and an environmental adoption statement incorporating the Habitats Regulations Assessment Adoption Statement.
- 5.3 Adopting the Local Plan with the proposed main modifications will ensure that the Council has an up-to-date Local Plan through which to make decisions on planning applications. It also ensures that the Council can benefit from the benchmarking of the Plan's 557dpa housing requirement for five years from adoption. This means that the higher local housing need (LHN) figure contained in the revised NPPF would not be triggered until then, and at a time when a new plan/site allocations are in place to meet the higher need. Such a Plan would need to be brought forward under the new planning regime as mentioned above in paragraph 2.3 and paragraphs 3.8-3.10.
- 5.4 There are also wider considerations in favour of adoption beyond the content of the Plan. Reputational damage would be avoided in the eyes of the government and wider public, shared agreements through the duty to co-operate and other stakeholders would not be jeopardized. Having a recently adopted Plan would also mean that planning resources would not be diverted to unnecessary appeals. With the planning reforms and local government reorganisation on the horizon, there are clear advantages of going forward with an adopted Plan before the reforms are implemented. The government has signalled that having an adopted plan is essential for accessing certain resources and investment.
- 5.5 **An option exists not to adopt the Local Plan** as modified. In such a scenario, the Council will not have an up-to-date Local Plan and could not comply with the transitional arrangements set out in December 2024 NPPF. Aside from significant reputational damage, failing to adopt the Plan would leave the Council without an up-to-date Plan on which to make decisions on planning applications and open to potential Government intervention. The Secretary of State has powers under the Planning and Compulsory Purchase Act 2004 to intervene in Plan making. LPAs that fail to progress their plans may be directed to revise their Local Development Scheme or face more direct intervention.
- 5.6 The Council would not be able to demonstrate a five-year land supply position (currently standing at 7.3 years) for the following reasons / implications:

1. In part as it could not rely on delivery of the site allocations contained in the Plan, Small Growth Village apportionment and windfall development projected in the Plans' delivery trajectory.
2. The Councils Housing delivery requirements would no longer be benchmarked at the Plans 557dpa but the higher December 2024 NPPF requirements of 932dpa;
3. The Council would fail the annual three-year rolling Housing Delivery Test resulting in the requirement to add a further 20% under delivery buffer to its housing needs and would have to prepare an action plan to address the shortfall, potentially facing further government intervention. The presumption of sustainable development would be engaged effectively meaning that the housing policies of the Council would be considered out of date and therefore development could come forward in locations and at a scale where it would normally not be desirable, (subject to some national protections). Such development could also undermine the planned growth and wider ambitions of the plan to ensure growth meets the needs of the District.

5.7 In addition the Council:

- Would have to find a significant extra supply of housing under the new standard methodology immediately.
- In decision making, could only apply limited weight (if any) to the existing Core Strategy given its age (2008) and changes to the NPPF.
- Would have to apply the presumption in favour of sustainable development where plans are out of date or absent and be required to grant planning permission *....unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the Framework as a whole...* The presumption of sustainable development contained in paragraph 11 of the NPPF would be engaged.
- Is likely to see an increase in costly planning appeal cases, additional work for officers and associated detrimental impacts on appeal performance as well as staff retention and recruitment of officers.

5.8 Overall, the Council would have less control over development. Decisions would default to national policy, increasing the risk of unplanned or speculative development, especially in areas without clear protections leading to approvals for developments that may not align with local priorities or infrastructure capacity. The government has signalled that having an adopted plan is essential for accessing certain resources. Councils without adopted plans may be less eligible for infrastructure funding, housing delivery support, or other government initiatives.

5.9 In producing the Plan a substantial volume of work has been undertaken by officers and a wide range of stakeholders, Members, consultants, parish and town councils, and various community groups. Each has participated in consultation events, attended hearings, made representations and engaged actively with the process throughout. If the Plan were not to be adopted, it would undoubtedly bring the Council into disrepute, through concerns around wasted time & resources, including financial considerations.

5.10 Neighbourhood Plans are required to be tested against general conformity with the adopted Local Plan. A number of new neighbourhood plans are emerging based in part on the evidence underpinning the Local Plan and their alignment with the emerging plan policies. If the Local Plan is not adopted, then these communities and neighbourhood plans would be negatively impacted.

## **6 Corporate Priorities**

- 6.1 Delivering the Local Plan remains a key commitment and component part of the Corporate Plan covering all five themes: Our Greener Future, Developing Our Communities, Meeting Our Housing Need, Investing in Our Local Economy and Infrastructure and A Strong, Responsible & Accountable Council.

## **7 Financial and Resource Implications**

- 7.1 The financial implications arising from the adoption of the Local Plan have been met from existing resources.

## **8 Legal Implications**

- 8.1 Plans are required to be reviewed every five years under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. Plans must be forward facing positively prepared and should look ahead a minimum 15 years from adoption.
- 8.2 The adoption of a Local Plan is governed by Section 23 of the Planning and Compulsory Purchase Act 2004, and Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Guidance on procedures is also contained in the national Planning Practice Guidance.
- 8.3 It is a legal requirement to have a Local Plan for the Councils' administrative area outside the Broads Authority Area. The Local Plan has been examined by a government appointed Inspector as to whether it has been prepared in accordance with legal and procedural requirements, and whether it is sound. The examination is now complete and the Plan with modifications has been found sound and legally compliant.
- 8.4 The Plan has undergone an Equality Impact Assessment(s), (EqIA), in accordance with Equality Act 2010 as amended 2023. The EqIA has examined whether the Local Plan will have an adverse impact on or discriminate against different groups in the community. The assessment identified that all policies within the Local Plan are likely to have either a positive impact or a neutral (no differential impact) on the different protected characteristics. There are no identified adverse impacts. The Inspector confirm in his report that he has had due regard to the Council's Impact Assessment. A further impact assessment has been undertaken on the final Plan incorporating the modifications and is attached in **Appendix 6**. The updated Impact Assessment has taken account of all modifications made through the examination process and confirms that the positive and neutral impacts identified remain valid.
- 8.5 The Plan has been informed by a Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and Habitats Regulations Assessment (HRA). The SA has explicitly considered and informed the policies and sites along with alternatives considered throughout the Plan's production. Carrying out a SA is a means of determining the most important environmental, social and economic factors in relation to an area, and testing the emerging planning policy document against those, with the aim of assessing the plan and seeking ways in which it might be improved or mitigated. It is an iterative process which informs the development of the Plan, carried out as a series of stages as the Plan is developed over time. The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA focused on potential

impacts from urban effects, nutrient neutrality/ hydrological impacts and recreational pressure on internationally protected sites.

- 8.6 The Inspector confirms in his report that he is satisfied that the SA has been carried out at each stage of the Plan's preparation, has been iterative, comprehensive and has adequately assessed the Local Plan to establish, when judged against reasonable alternatives, that the Plan will help achieve relevant environmental, economic and social objectives. Similarly, the Inspector is satisfied with the conclusion of the HRA(s) that the modified Plan's protections and mitigating measures enable the overall conclusion of the HRA that the Plan would not cause adverse effects either alone or in combination on European sites.
- 8.7 On adoption of the Local Plan, in line with Regulations 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the LPA has to make available the following documents as soon as reasonably practical:
- A copy of the adopted Plan,
  - An Adoption Statement and
  - The sustainability Appraisal report (SA and addendums)

Along with details of inspection, locations, and times available.

## **9 Risks**

- 9.1 It is considered that the risks of taking the decision to adopt the Plan are low and that the risks of non-adoption out way any perceived disbenefits of adopting the Plan. The Plan as modified has been found sound and legally compliant by the Inspector. The risks relate to the non-adoption of the Plan. Non-adoption would lead to more speculative development in unplanned locations, potential government intervention, reputational damage, further resource issues such as recruitment and retention, and financial implications, including pertaining to wastage of public monies. Non adoption is likely to reduce both government and private investment in the area. Such risks will be addressed by the adoption of the Plan.
- 9.2 It is considered there is a real threat of Government intervention for those LPAs which are not making sufficient progress on their Plans to have an adopted plan in place by December 2026.
- 9.3 Upon adoption there is a six-week window under section 113 of the Planning and Compulsory Purchase Act 2004 during which an aggrieved party can challenge the decision to adopt a Local Plan on legal and procedural grounds.

## **10 Net Zero Target**

- 10.1 No assessment has been made against the Council's Net Zero 2030 Strategy & Climate Action Plan.

## **11 Equality, Diversity & Inclusion**

- 11.1 The Plan has undergone Equality Impact Assessment, (EqIA) in accordance with The Equality Act 2010, as amended 2023. As detailed in paragraph 8.4, the assessment identified that all policies within the Local Plan are likely to have either a positive impact or a neutral (no differential impact) on the different protected characteristics. The Inspector confirmed in his report that he has had due regard to the Council's Equalities Impact Assessment. A further impact assessment has been undertaken on the final Plan incorporating the modifications and is attached as **Appendix 6**. The updated Equalities Impact Assessment has taken account of all modifications made through the

examination process and confirms that the positive and neutral impacts identified remain valid.

## **12 Community Safety issues**

- 12.1 The Plan includes in its policies requirements for integrated design that reduces opportunities for crime and antisocial behaviour to help create safe, secure and accessible environments. Although the Policy is funded directly by central government and the parish precept, further contributions to relevant infrastructure could be sought through S106 contributions as long as requests align with NPPF requirements of being relevant, necessary and proportionate and do not make a proposal unviable. Norfolk Constabulary remain a consultee and can advise planning applicants on matters such as design and layout to reflect best practice in this area.

## **13 Conclusion and Recommendations**

- 13.1 The Inspector's report remains positive and endorses the strategy and site allocations set out in the Plan and the successful development of an updated Local Plan is a considerable achievement for the Council. Only approximately 29% of local authorities currently have an up-to-date Local Plan, meaning one that has been adopted within the last five years or reviewed and found not to need updating.
- 13.2 Adopting the Plan provides a strong planning foundation and decision-making framework for planning applications as we move towards local government reorganisation. Adoption of the Local Plan will allow the Council to implement evidence-based policies for our District through a Plan, which the Council has invested considerable resources in. Whilst it has been a long process, national data shows that the average time to produce a Local Plan is around seven years under the current Local Plan system. Looking ahead at future Plan review, the government has introduced a target of 30 months i.e. 2.5 years to produce and adopt a Local Plan under the new system as set out in the Levelling up and Regeneration Act 2023 reforms.
- 13.3 The Local Plan, although submitted for examination over two years ago, still reflects the Council's priorities as set out in its Corporate Plan and delivers on the direction of travel of national policy. In particular, it sets a framework for step change in order to address local priorities and needs. The Local Plan contains multiple policies underpinned by the principle of delivering sustainable and climate-resilient development to secure a better quality of life for everyone, now and for future generations. All policies within the Plan contribute towards achieving these aims, including those promoting the sustainable location of new homes, jobs and economic growth; the conservation and enhancement of the natural environment and built environment; improved infrastructure and renewable energy; the provision of green spaces and the creation of balanced, healthy communities
- 13.4 Having received a positive Inspector's report, one that finds the Plan sound and endorses the strategy as an appropriate basis for the planning of the District, the case for adoption is overwhelmingly positive.

## Recommendations

### That Cabinet:

- 1) Notes the outcome of the Inspector's Report into the examination of the North Norfolk Local Plan, dated 31 October 2025 (Appendix 1 & 2);
- 2) Recommends that the Council adopts the modified Local Plan which incorporates the Main Modifications as the appropriate basis for the future planning of the whole District (Appendix 3);
- 3) Notes that all policies of the North Norfolk Core Strategy 2008 and the Site Allocations; Development Plan Document 2011 (the current Local Plan) will be superseded by the new Local Plan upon adoption. This is subject to the provisions of paragraph 9.3 of this report that: 'Upon adoption there is a six-week window under section 113 of the Planning and Compulsory Purchase Act 2004 during which an aggrieved party can challenge the decision to adopt a Local Plan on legal and procedural grounds'
- 4) Delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the North Norfolk Local Plan part of the Adopted Development Plan for North Norfolk;
- 5) Delegates authority to the Planning Policy Manager to make any further necessary non-material modifications and any further updates to the Policies Map as required.

## Appendices

|            |                                                                                                                                                                   |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Appendix 1 | The Inspector's Report on the Examination into the North Norfolk Local Plan                                                                                       |
| Appendix 2 | The Inspector's Schedule of Main Modifications                                                                                                                    |
| Appendix 3 | North Norfolk Local Plan 2024-2040, Proposed Adoption Version (incorporating the Inspectors Main Modifications and the Councils Additional [minor] Modifications) |
| Appendix 4 | Policies Map (Web Map) <a href="https://www.north-norfolk.gov.uk/policiesma">https://www.north-norfolk.gov.uk/policiesma</a>                                      |
| Appendix 5 | Sustainability Appraisal Adoption Statement (incorporating the HRA Adoption Statement)                                                                            |
| Appendix 6 | Equalities Impact Assessment                                                                                                                                      |
| Appendix 7 | Presentation to PPBHP and Development Committee re Local Plan overview                                                                                            |