

	Potential Local Plan Review
Executive Summary	<p>This report covers the next steps for the authority in terms of Local Plan making.</p> <p>Firstly, it recommends that the North Norfolk Local Plan 2024-2040 should be reviewed in line with government expectations and statute requirements. Secondly, it recommends that the Council continues in its work to inform and influence the future production of a Spatial Development Strategy including engagement, evidence gathering and collaborative work through the Norfolk Strategic Planning Framework.</p>
Options considered	An option remains not to progress a plan review.
Consultation(s)	Portfolio holder
Recommendations	<p>That Cabinet resolves:</p> <p>1) To progress the review of the NNDC Local Plan in line with Government expectations and statute requirements.</p> <p>2) To continue working to inform and influence the future production of a Spatial Development Strategy including engagement and collaborative work through the Norfolk Strategic Planning Framework.</p>
Reasons for recommendations	To maintain an up-to-date Local Plan and to comply with statutory requirements in order to provide appropriate planning policy and guidance for the district.
Background papers	<p>Plan-making regulations explainer - GOV.UK This is an explainer of the emerging regulations for the new plan-making system. We anticipate that the regulations will be enacted early this year.</p> <p>Rollout of the new Local Plan-making system - GOV.UK This is an explainer around the roll out of the new plan-making system, including transitional arrangements. The full regulations underpinning this are expected to be in force in early 2026.</p> <p>New System Plan Funding - GOV.UK This details the funding available for local authorities committed to bringing a plan forward early in the new plan making system process.</p>

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown
Contact Officer	Iain Withington, Planning Policy Manager iain.withington@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	Delivering and ensuring the Council maintains an up to date 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)	Local Plan budget
Council Policies & Strategies	The Local Plan sets the Council's Planning and decision-making framework. Adoption of any new Local Plan would replace the current 2024-2040 Local Plan.

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

1. Purpose of the report

- 1.1. The purpose of this report is to bring to Cabinet's attention the Governments expectations and requirements around future Local Plan making and the legislative changes to the plan making process, in order to seek authority to commence Local Plan review. Secondly, it brings to Members' attention the work being undertaken through the Norfolk Strategic Planning Framework (NSPF) with regard on going co-operation in plan-making and recommends that the Council continue in its work to inform and influence the future production of a Spatial Development Strategy including engagement, across Local Planning utilities and wider stakeholders, evidence gathering and collaborative work through the NSPF.

2. Introduction & Background

- 2.1. The North Norfolk Local Plan 2024-2040 (NNLP) was adopted on 17th December 2025. The Plan was submitted for examination on 11th May 2023 when the July 2021 version of the NPPF was extant. The Plan was examined under transitional arrangements set out in subsequent versions of the National Planning Policy Framework (NPPF), which meant, for the purpose of the examination, the policies of the 2021 NPPF were applicable.
- 2.2. Significant changes were made to the National Planning Policy Framework, NPPF in December 2024. Significantly, it brought into effect changes in the standard methodology for calculating local housing need (LHN). These

changes increase the Council's annual housing requirement from 557 dwellings per annum to 932dpa, an increase of 67% and which means that the adopted Local Plan's housing requirements are no longer consistent with the government's current assessment of housing need.

- 2.3. As set out in the December 2024 NPPF¹, where Plans have been examined under such transitional arrangements and where the adopted Plans housing requirement remains less than 80% of the local housing need, the updated NPPF requires Local Planning authorities to begin work on a new Plan. Such a Plan is expected to address the shortfall in housing need and be brought forward under the revised plan-making system set out in the Levelling Up and Regeneration Act 2023, LURA, as soon as the relevant provisions are brought into force.
- 2.4. Policies in Local Plans should be reviewed at least once every five years to assess whether they need updating and should then be updated as necessary.² The NPPF paragraph 34 states that "*Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area...and they are likely to require earlier review if local housing need is expected to change significantly in the near future.*"
- 2.5. The final report on the examination of the adopted plan from the Planning Inspectorate (PINS) advised that, in line with the December 2024 NPPF, the authority will be expected to begin work on a new Local Plan under the revised plan-making system as soon as the relevant provisions are brought into force.

New Plan-making system

- 2.6. The Ministry of Housing, Communities & Local Government (MHCLG) have since confirmed that North Norfolk is required to bring a Plan forward under the new plan making system by the dates specified. The new process is set to be simpler and faster to prepare, and plans are set to follow a sequence of key plan-making steps in order to be adopted within a 30-month timeline from commencement initiated at the Gateway 1 stage. The first key dates are 30th June 2026, where the authority is required to have published a 'notice of intention to commence Local Plan preparation', and 31st October 2026 whereby the authority is required to publish a 'Gateway 1 self-assessment'. Such an assessment will set out details of how the authority has "got ready" for the formal stages and how it intends to adopt the plan in the newly prescribed 30-month timeframe. Gateway 1 marks the formal commencement of the 30-month plan making timeframe. It is this stage the authority must have published:

- a Local Plan timeline
- established appropriate project management and governance
- established a consultation and engagement plan
- detailed scoping and an understanding of the content of the plan i.e. the main and locally specific subject matters

¹ Paragraph 236

² Reviews at least every five years are a legal requirement for all local plans (Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012).

- baseline information, likely evidence needs and early considerations of the spatial options to deliver against the identified needs as well as topics that may require specific policies.

More detail of this new process is set out in Appendix 1.

- 2.7. The authority will also have started the first iteration of the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) and invited early engagement from stakeholders by running a scoping consultation.
- 2.8. It is anticipated that early scoping work would need to involve a 'Call for Sites' and a review of the capacity of the district to deliver on the uplifted local housing need. Although limited scoping work has been carried out to date, it is anticipated that a refresh of certain key evidential documents such as the Strategic Flood Risk Assessment (SFRA), Water Cycle Study (WCS), and other topic-based documents as well as and the continuation of other joint work streams across Norfolk LPAs will need to be commissioned as early as possible from the start, and certainly prior to Gateway 1.
- 2.9. North Norfolk is not alone in this requirement; it is estimated that up to 40 Local Planning authorities fall into this immediate review category. Across Norfolk this includes Broadland, Norwich and South Norfolk, which operate collectively through the Greater Norwich Development Partnership (GNDP), Kings Lynn and West Norfolk, and Great Yarmouth Councils. All three have already committed to such a review and the expected timelines. More information on the requirements, circumstances around plan review and the expected transition of Local Plans to the new system can be found in the guidance published by MHCLG [Rollout of the new Local Plan-making system - GOV.UK](#)
- 2.10. Breckland District Council is already progressing an updated Local Plan which will plan for their December 2024 uplifted local housing needs. The Broads Authority is also progressing its Local Plan under the current plan-making system. Norfolk County Council recently adopted its Minerals and Waste Local Plan and a review of this will not be required for several years.

Funding

- 2.11. The government has committed to providing support and resources to assist the above including the guidance documents listed and the opportunity to apply for new system funding.
- 2.12. As an eligible authority, on 19 January 2026, the Council was invited to submit an expression of interest in relation to a share of a £14 million fund to support Local Plan implementation. With support from the CEO and Section 151 officer, an expression of interest was submitted, which, if successful, could provide approximately £120,000 to supplement the specific Local Plan preparation requirements. The window to apply was short, with an application deadline of 28 January 2026. Successful LPAs are expected to be notified of the outcome by 6 March 2026. More information is available at: [New System Plan Funding - GOV.UK](#). Should the Council choose not to advance a new Local Plan, any awarded funds would need to be returned.

Local Government Reorganisation & Devolution

- 2.13. The Plan will be taken forward at a time of local government reorganisation (LGR) and depending on the way the decision falls on which of the three unitary options the Government intends to move forward with, there may be opportunities to work collaboratively in advance with elements of joint approaches and closer shared resources as closer integration and working practices become known. This may also include early work to consider the identification of potential broad areas of growth and/or the delivery of a new settlement(s). Any Local Plan review would almost certainly be adopted by the new unitary Council(s) but would cover only that area that it is set to replace, i.e. the current North Norfolk Administrative area outside of the Broads.
- 2.14. If devolution for Norfolk and Suffolk is also taken forward as intended, officers will also have to work on the new Spatial Development Strategy (SDS) for Norfolk and Suffolk. Early work continues under the direction of Norfolk County Council through the NSPF until such time as a mayor is appointed. There is the opportunity for work on the SDS and a North Norfolk Local Plan review to share an evidence base. With the mayoral elections currently delayed it is not anticipated that any SDS will be adopted before 2029/2030. This would be beyond the governments required timeline for Local Plan review and as such would not influence the next round of plan-making. **This means that it is not advisable to wait until the SDS is in place to review the Local Plan for North Norfolk.**
- 2.15. There is the opportunity to work collaboratively through the NSPF to review and share elements of the required evidence base, align strategic approaches and benefit from shared resources and cost efficiencies in the commissioning of joint evidence. Currently officers are working on an update to the combined site assessment process through work on updating the current Housing & Economic Land Availability Assessment (HELAA) methodology and are in the process of commissioning a Norfolk-wide Housing Capacity Study with the aim of comparing baseline need against constraints/opportunities. This study will inform each district's Local Plan review, as well as provide information for the future SDS, and is intended to identify the extent to which existing LPAs can meet their housing needs and advise on an optimal delivery scenario both for unmet need and overall need.
- 2.16. The requirement for a Norfolk and Suffolk SDS is brought forward in recent legislation via the Planning and Infrastructure Act and proposals in the emerging draft NPPF, both published in December 2025. These documents are intended to reintroduce strategic, sub-regional planning to guide cross-boundary growth, housing, and infrastructure issues. In the future, Local Plans will be required to be in conformity with the relevant SDS. Since there is no current SDS in place for our area, conformity with an emerging SDS will need to be taken into consideration when reviewing and examining Local Plans (subject to progress at the time).
- 2.17. SDSs are likely to be concise documents to guide development across larger geographical areas. The government intends that they will cover

strategic infrastructure and housing. The SDSs will cover the future amount and high-level distribution of housing, possibly including any potential broad locations for new settlements, **but not site allocations**. Thus, we can expect housing figures for the new unitary authorities in time. Site allocation will remain a key role of Local Plans, which will need to be reviewed as soon as possible as stated above.

- 2.18. The role of the district councils would be to work collaboratively with other Norfolk authorities, and then with the mayoral authority in the development of the SDS. The early collaborative work now underway on an SDS is likely to have overlaps with the work that would need to be carried out in the development of a new Local Plan.

Proposed National Planning Policy Framework

- 2.19. Any new Local Plan would need to be informed by the proposed updated NPPF and take account of the new National Development Management Policies (NDMPs) that it will contain. The final version is expected to be published in the Spring of 2026. In preparing plans, the draft NPPF states that plan makers should:

- a. Only address matters and include policies that are relevant and which avoid duplication or other parts of the development plan
- b. Only include policies which extend beyond site or locational-specific requirements where they are necessary and where there is clear and justified reason to do so
- c. Not duplicate, substantially restate or modify the content of national decision-making policies
- d. Engage positively with communities and other key stakeholders at appropriate points using a range of methods, so that relevant issues are identified and addressed as early as possible during the plan making process
- e. Use environment assessment to inform preparation of plans, where legally required and
- f. Publish plans in a searchable digital format

Source PM6 draft December 2025 NPPF

- 2.20. In identifying land, the Local Plan will need to be informed by an assessment of the land available in their area to meet development needs. This will need to be followed by an assessment of their availability, suitability and achievability (including likely viability) and the identification of the most appropriate sites for development taking into account the emerging vision and spatial strategy and the more permissive nature of the emerging NPPF. This is likely to include the proposed 'permanent presumption in favour of suitably located development' which is proposed to dovetail with policies on development inside and outside of settlements. Such settlements are currently defined in the emerging draft NPPF as including villages and other predominantly built-up areas, but which exclude hamlets and scattered groups of housing.
- 2.21. Officers provided a Member training session and presentation on the emerging NPPF, and its links to plan-making on 29 January 2026, which was well attended.

3. Proposals and Options

- 3.1. It is proposed to start work on a new Local Plan in line with the new plan-making regulations (summarised in Appendix 1) and new NPPF immediately upon Cabinet approval through a detailed scoping exercise followed by project initiation through Corporate Leadership Team and the Major Projects Board. This is likely to result in the need to scale up resources and will lead to the issuing of the required 'notice of intention to commence Local Plan preparation' on or before 30 June 2026 in line with government expectations, along with the plans proposed timetable. Such early work will involve a review of: the new plan making requirements, evidence gathering, including the commissioning of updated or new evidence where considered proportional and relevant, resources (both financial and staff), along with Member governance, and is likely to include the publishing of an early Call for Sites as soon as work commences. It is likely that a more robust and faster member oversight process will need to be set up.
- 3.2. By 31 October 2026 the Council will be expected to publish its detailed Gateway 1 self-assessment summary setting out the details of its readiness to commence the 30-month plan making period and detailing such matters as the anticipated Local Plan content, initial environmental assessment, its project management and governance arrangements (currently undertaken through the Planning Policy and Built Heritage Working Party (PPBHWP) etc as set out in paragraph 2.6 above.
- 3.3. In addition, digitalisation will play a major role both in how plan-making is undertaken and in the nature of the resource required. Any scoping exercise will need to include a review of Investment in "Plan Tech" would mean that the time taken for plan-making can be significantly reduced and efficiencies made to align with the new system requirements. Many of the more labour-intensive elements such as undertaking site assessment and summarising consultation responses can take up significant resource and the opportunity exists to make greater use of digitalisation and ensure efficiencies are brought into the process.
- 3.4. Paragraph 22 of the NPPF requires Local Plans to look ahead a minimum of 15 years, and where larger-scale development is proposed, such as a new settlement, the timescale should be 30 years or more. This is to take into account the likely timescale for delivery. Therefore, assuming a new Local Plan is adopted in 2029, it would set out a direction travel to at least 2044 and possibly as far ahead as 2059.
- 3.5. As set out above (paragraph 2.19), the new form of plans should not set out to repeat or duplicate the National Development Management Policies, and this should result in the plan being more streamlined and focused. The strategic vision of a new Local Plan would likely need to address the need to ensure a continuing supply of homes from a range of available and deliverable sites. Secondly, it is potentially likely that it would need to consider how the potential delivery of new homes from one or more new settlements (or the expansion of existing settlements) could come forward as quickly as supporting infrastructure allows.

- 3.6. The recent adoption of the Local Plan means that many policies may already be aligned to changing national policy or may not require significant update, however some of the evidence will require updating.
- 3.7. Given that it is possible that the LPA area could not meet the higher housing numbers within its current boundaries, cross boundary co-operation through the NSPF and the development of the SDS will play a major role in Local Plan review. It is considered equally important that the Council continues to work collaboratively to inform and influence the future production of a Spatial Development Strategy, including engagement and collaborative work through the Norfolk Strategic Planning Framework, and, where possible, to develop a collective evidence base.
- 3.8. **An option exists not to undertake the plan** review at this time - **this is not advised**. Having a Local Plan in place that aligns with updated national policy and legislative requirements supports a healthy local economy, with housing allocations, job and infrastructure provision and environmental protection. Not updating the Local Plan will lead to poorly planned development, particularly for housing which will meet the higher housing needs required by the December 2024 NPPF but could result in delivery in sub-optimal locations that would be unlikely to be supported by the full range of infrastructure investment necessary for growth.
- 3.9. Not undertaking Plan review around the expected timeframes would expose the Council to a number of risks:
- **Intervention** - the Secretary of State directing the Council to prepare/revise the plan or take direct control over the process.
 - **Reputational damage** - signalling that the Council is not meeting statutory expectations or managing growth proactively.
 - **Policy frameworks becoming outdated** - resulting in greater vulnerability at appeal where applicants argue policies are “out of date” and difficulty resisting speculative or unplanned development.
 - **Loss of influence** - in shaping infrastructure, housing distribution, and environmental policies.’
 - **Loss of central government funding** – any specific new Local Plan making funding support would have to be returned.
- 3.10. The Government has said that regulations, policy and guidance for the new plan-making system continue to be confirmed and have published guidance and other supporting material for scoping work on Local Plans, for LPAs at the forefront of the new system.
- 3.11. The new Plan is envisaged to be in place by mid-2029, and although the Council can currently demonstrate a five-year housing land supply, it may not be able to in the years ahead. It is anticipated that the Council will find the Government’s Housing Delivery Test challenging going forward once the current figures are published by MHCLG in the coming months.
- 3.12. The HDT monitors housing delivery on a rolling three-year average in arrears and compares the average against the then adopted Local Plan requirements for the same period. Last years published results by the government (reflecting the 2023 HDT) demonstrates that the delivery of

housing averaged 87% against the requirement. In any updated results it is forecast to fall because of persistent under delivery over the previous three-year period. As such, it is expected that a 20% buffer would need to be added to the housing requirement moving forwards, unless completion rates (and planning permission rates) increase. Although it is expected that the Council will maintain its five-year housing land supply in the immediate time scale, due to the continued economic uncertainty it may not be the case in the medium term. As such it is advantageous to start an early plan review.

- 3.13. If the Council were to delay reviewing its Local Plan until the SDS has been adopted in 2029/2030, housing supply could be constrained as there would be no new site allocations in place until 2032/33 at the earliest for the area covered by the former North Norfolk District Council. While there is something of a mismatch between the timing of the different types of plans, this is inevitable when a new tier of plan-making is established. However, as emphasised in the instructions from Ministers highlighted above, government clearly does not want to see delays in reviewing Local Plans.

4. Corporate Priorities

- 4.1. Local Plans give councils the unique ability to shape land-use across administrative areas, which makes it one of the most influential documents councils prepare. A Local Plan influences government and stakeholder policy on matters like inward investment for jobs growth and infrastructure, locally it is the basis on which local communities can write a neighbourhood plan for their town or village, and on a day-to-day basis it guides every planning application that is determined.
- 4.2. Delivering and ensuring that the Local Plan remains current is 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

5. Financial and Resource Implications

Budget

- 5.1. A costed budget for the project would need to be scoped out. The current Local Plan budget (excluding staff costs) remains healthy with a year-end balance expected to be in the region of £300,000. The budget for future Local Plan review has been funded since 2018/19 by £50,000 increments each year from the Council's planning reserve. As detailed above in paragraphs 2.11-2.12, the government has committed to providing support and resources to assist. Officers have submitted an expression of interest to MHCLG for Local Plan financial support. If successful, it is estimated that an additional £120,000 could be granted from central government. This could be spent on supporting the Local Plan production through preparing and updating the evidence base, technical studies, including that of hiring consultants to undertake these and/or a proportion could be allocated for recruitment.

- 5.2. The production of the last Local Plan cost in the region of approx. £540,000, (excluding staff costs), however this took approx. 9 years. Although much of the evidence base is still required, the process has been streamlined with the governments expectation that once Gateway 1 is reached the project will be completed in 30 months. Evidence however needs to be proportionate, and it is expected that not all of the adopted evidence base will be required to be updated.

Staffing & digitalisation

- 5.3. The new plan-making process will be significantly resource intensive, and work in this area will be in addition to the existing workloads undertaken by the current planning policy team.
- 5.4. Supported by appropriate investment around the opportunities for the digitalisation of plan-making, the existing planning policy staff resource will need to be reviewed in order to deliver the statutory requirements (inclusive of collaboration & joint commissioning of work with other parties)
- 5.5. In recent times, significant cost savings have been made in the policy team budget from the non-replacement of staff and the team is considered to be operating at capacity. A review of staffing and budget requirements to support delivery of the statutory requirements will be needed.

Comments from the S151 Officer:

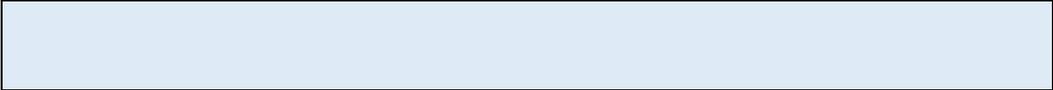
The financial impacts and their timings over the next 34 months will be determined by the Assistant Director of Planning in the coming months. Any unbudgeted costs in delivery will be first sought from the existing Planning and Land Charges Ear Marked Reserves.

6. Legal Implications

- 6.1. By adopting its Local Plan on 17 December 2025, the Council has completed its Plan under the legacy system before the commencement of the new plan-making regime. This places the Council in a stronger and more flexible position than authorities with emerging Plans still at Regulation 18, 19, or examination stages, because with the plan already in force it is capable of guiding development in the interim with full statutory weight.
- 6.2. It is a legal requirement to have a Local Plan for the Councils' administrative area outside the Broads Authority Area. The planning system remains planned and the government is committed to achieving universal Local Plan coverage. Secondary regulations to commence plan-making under the new system as set out in the LURA are expected to be laid before parliament shortly.

Comments from the Monitoring Officer

The Monitoring Officer (or member of the Legal team on behalf of the MO) will complete this section. They will outline any legal advice provided.



7. Risks

7.1. There are a number of current risks which are not considered exhaustive:

- Digitalisation: MHCLG's digital planning team emphasises that new digital tools and standards are central to the new plan-making system. The new plan system imposes digital standards for data formats, spatial policies and interactive mapping. There remains risk around falling behind without early identification and investment in appropriate plan making systems.
- Funding: Although the government has indicated at least £14m to support plan-making nationally, full details of long-term funding, capacity programmes, and resource allocation have not yet been confirmed. Additional MHCLG funding for NNDC has not been confirmed at the time of writing.
- National policy: ongoing uncertainty around NPPF changes and continued national reforms can disrupt plan preparation.
- New system: the new 30-month process, incorporating gateways, stages assessment and upfront resources is not tried and tested and considered challenging with high chance of delay or failure due to the new requirements and compressed timelines.
- Resource constraint: insufficient budget, and a challenging recruitment market.
- External stakeholder capacity constraints: increased pressures and abilities of existing stakeholders to respond through engagement in the required times.
- Governance: Procrastination and internal decision-making delays as well as Member governance.
- Local government reform: ongoing uncertainty, and involvement in due process of the SDS provides uncertainty and potential disruption to plan making.

8. Net Zero Target

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

9. Equality, Diversity & Inclusion

9.1. Any new Plan would need to undergo Equality Impact Assessment, (EqIA) in accordance with The Equality Act 2010, as amended 2023

10. Community Safety issues

10.1 The current 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. Norfolk Constabulary remain a consultee and can advise planning applicants on matters such as design and layout to reflect best practice in this area. The constabulary are also a statutory consultee in plan-making.

11. Conclusion and Recommendations

11.1 Production of a new Local Plan at this time is necessary in line with instruction from MHCLG, statutory and emerging secondary legislation, and published guidance. Based on the Government's current policy, all indications are that any new Local Plan will need to be based around boosting the supply of new homes, plus other key land-use considerations. These include: employment, retail, leisure, and commercial development; infrastructure for transport, telecommunications, water, and energy generation, as well as community facilities like healthcare and education. Given the direction of travel, undertaking a plan review and the continued engagement through the NSPF is the only realistic option to meet the additional homes and jobs in a sustainable and timely manner.

11.2 Whilst it is understandable that there may be reticence at a time of change for local government about embarking on a new round of plan-making relatively soon after adopting the current NNLP, a number of factors as set out in the report and in Appendix 1 dictate that there is both a clear need and a statutory duty to begin preparations to update the Local Plan at this time.

11.3 Recommendations

That Cabinet resolves:

- 1) To progress the review of the NNDC Local Plan in line with Government expectations and statute requirements.**
- 2) To continue working to inform and influence the future production of a Spatial Development Strategy including engagement and collaborative work through the Norfolk Strategic Planning Framework.**

Appendices

Appendix 1: Overview of the new Plan making system and regulatory requirements