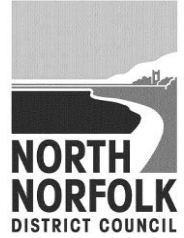


# Planning Policy & Built Heritage Working Party



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**Direct Dial:** 01263 516019

10 August 2018

A meeting of **Planning Policy & Built Heritage Working Party** will be held in the **Council Chamber** at the Council Offices, Holt Road, Cromer on **Monday 20 August 2018 at 9.30 am.**

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

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

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

**Emma Denny**  
**Democratic Services Manager**

To: Mrs S Arnold, Mrs S Bütikofer, Mrs A Fitch-Tillett, Ms V Gay, Mrs A Green, Mrs P Grove-Jones, Mr N Pearce, Ms M Prior, Mr R Reynolds, Mr S Shaw, Mr R Shepherd, Mrs V Uprichard

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



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

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

**Heads of Paid Service:** Nick Baker and Steve Blatch  
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## AGENDA

### 1. APOLOGIES FOR ABSENCE

To receive apologies for absence, if any.

### 2. PUBLIC QUESTIONS

### 3. MINUTES

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To approve as a correct record the Minutes of a meeting of the Working Party held on 23 July 2018.

### 4. ITEMS OF URGENT BUSINESS

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

### 5. DECLARATIONS OF INTEREST

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

### 6. UPDATE ON MATTERS FROM THE PREVIOUS MEETING

### 7. LOCAL PLAN – OPTIONAL TECHNICAL STANDARDS

Page 10

Summary: This report considers the evidence for introducing optional technical standards around accessible & adaptable dwellings and water efficiency.

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

Recommendations: **This report recommends that the Working Party recommend to Cabinet to develop a policy approach based around the adoption of Optional Technical Standards based on**

- a) **100% dwelling requirement for Optional M4(2) - Accessible and Adaptable dwellings;**
- b) **5% dwelling requirement on affordable properties for optional M4(3) - Wheelchair User Dwellings;**
- c) **Implementation of the Higher Water Efficiency standards across all new dwellings.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Iain Withington Planning Policy Team leader 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

Summary: This report considers the viability evidence supporting the Local Plan.

Conclusions: In general terms, housing development proposed in all locations in the North Norfolk District Local Plan are broadly viable with affordable housing percentages of 45% and 25% across geographical zones identified

Recommendations: **That the results of the study are noted and following industry engagement and any necessary amendment the study is published as part of the evidence base for Local Plan preparation.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
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## 9. PLANNING POLICY UPDATE – PUBLICATION OF NEW NATIONAL PLANNING POLICY FRAMEWORK

Summary: This report provides a summary of the key provisions of the new National Planning Policy Framework and its likely impacts in relation to the on-going review of the North Norfolk Local Plan particularly in relation to housing provision.

Conclusion The new National Planning Policy Framework retains much of the thrust and detailed content of the earlier version but includes some significant changes in relation to housing provision, targets for delivery of growth and the types of sites which should be identified for residential development. These will need to be addressed as part of Local Plan preparation.

Recommendations:

1. **That preparation of the draft plan proceeds on the basis that ‘up to’ 11,000 dwellings may be required.**
2. **That the plan identifies approx. 15 smaller sites of around 1 hectare for allocation *provided* such sites were put forward and are suitable for development.**
3. **That the additional large sites identified in Section 5 of the report are identified as provisional preferred options.**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Mark Ashwell, Planning Policy Manager, 01263 516325	

**10. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution (if necessary):

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

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

**23 JULY 2018**

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

Councillors

J Punchard (Vice-Chairman) in the Chair

Ms V Gay  
Mrs A Green  
N Pearce

Ms M Prior  
R Reynolds  
Mrs V Uprichard

Observers:

Mrs A Claussen-Reynolds  
B Smith

Officers

Mr M Ashwell – Planning Policy Manager  
Mr C Young – Conservation, Design & Landscape Team Leader

**20. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Mrs S Arnold, Mrs S Bütikofer, Mrs A Fitch-Tillett, Mrs P Grove-Jones and S Shaw.

**21. PUBLIC QUESTIONS**

None.

**22. MINUTES**

The Minutes of the meeting held on 18 June 2018 were approved as a correct record and signed by the Chairman.

**23. ITEMS OF URGENT BUSINESS**

None.

**24. DECLARATIONS OF INTEREST**

None.

**25. UPDATE ON MATTERS FROM THE PREVIOUS MEETING**

The Planning Policy Manager reported that the revised National Planning Policy Framework (NPPF) was expected to be published by the end of the week.

## **26. THE GLAVEN PORTS CONSERVATION AREA APPRAISALS & MANAGEMENT PLANS 2018**

The Conservation, Design & Landscape Team Leader presented the draft Conservation Area Appraisals and Management Plans for Blakeney, Cley, Morston and Wiveton. He outlined the background to the review, policy context and the benefits and structure of the review, which had been undertaken by consultants acting on behalf of the Council. He outlined the proposed boundary changes and recommendations for local listing for each of the Conservation Areas.

Councillor R Reynolds referred to the deletion of the marshland area from the Blakeney Conservation Area. He considered that the marshes should be retained within the Conservation Area boundary, and that protection of the marshes should be extended from Wells to Salthouse as the view from the coastal path into the Conservation Area was important and was an issue often referred to when considering planning applications.

Councillor Ms V Gay proposed that the recommendations contained in the report to approve the draft appraisals for public consultation, and that following consultation the amended appraisals be brought back to the Working Party for consideration. She was pleased to see the inclusion of the Blakeney War Memorial within the Conservation Area boundary. She hoped that there would be a rolling programme for Conservation Area appraisals and that they would be used in decision making. She requested further information about the consultants.

The Conservation, Design & Landscape Team Leader explained that it was hoped that there would be a rolling programme of appraisals but they took time and resources. In the past, appraisals had been focused on areas which were particularly susceptible to development pressure. Appraisals were in place for the towns and major villages. It was hoped to continue the programme along the Glaven Valley. He explained that Purcell were national consultants with a broad portfolio and a great deal of experience. Officers had worked with them to produce interactive documents which were more dynamic and easier to use than previous appraisals.

Councillor R Reynolds supported the recommendation and asked for an appraisal of the marshland area if possible.

The Conservation, Design & Landscape Team Leader explained that the Conservation Areas were primarily related to the built environment and he had concerns regarding the inclusion of the marshland along the coast as it was constantly changing and difficult to draw a boundary. It was easier in conservation terms to define a conservation area around the built environment.

The Planning Policy Manager suggested including text describing the importance of the setting of the Conservation Area and making it clear that the marshes were important to the setting.

Councillor Ms V Gay considered that marshland was already subject to statutory protection, whereas buildings had less protection. She supported the suggested wording.

The Planning Policy Manager confirmed that Conservation Areas served a particular purpose of protecting the built rather than the natural environment. There were other tools to protect the marshes and he considered that it would be sufficient to reference the importance of the marshes and the view from them.

It was proposed by Councillor Ms V Gay, seconded by Councillor R Reynolds and

**RESOLVED**

1. **That the draft Conservation Area appraisals and Management Plans for Blakeney, Cley, Morston and Wiveton be approved for public consultation.**
2. **That following consultation, the amended appraisals be brought back to Working Party for consideration and subsequent recommendation for adoption by Cabinet.**

**27. COASTAL PLANNING – STATEMENT OF COMMON GROUND**

The Planning Policy Manager presented a report which explained the meaning and purpose of Statements of Common Ground (SOCG) in the plan making process, and a draft Coastal Zone Planning SOCG which set out an agreed set of high level principles in relation to coastal planning which would provide the framework for more detailed policy development at a local level in each of the partner Authorities' Local Plans. He recommended that the Working Party recommend to Cabinet that the SOCG be signed on behalf of the Authority.

The Planning Policy Manager reported that Councillor Mrs H Cox, the Portfolio Holder for Coastal Planning, was fully supportive of the recommendation. He also reported that Councillor Mrs A Fitch-Tillett, who was unable to attend the meeting, had expressed her total support for the recommendation and had stressed that planning members were fully aware of the policies and would apply them in future.

It was proposed by Councillor R Reynolds, seconded by Councillor N Pearce and

**RECOMMENDED to Cabinet**

**That the Coastal Zone Planning Statement of Common Ground be signed on behalf of North Norfolk District Council.**

**28. PROGRESS ON RESIDENTIAL SITE ALLOCATION**

The Planning Policy Manager updated Members on the current position in relation to provisional residential land allocations, reminding Members that consideration still needed to be given to other land uses, smaller sites and the approach to other policy areas such as self-build housing.

He advised that the provisional sites identified to date were of sufficient size to accommodate around 3,300 dwellings and once an appropriate allowance had been made for built development, sites already with planning permission and future windfall development, it would be sufficient to address the previously agreed preferred approach to deliver around 9,000 dwellings in total. This figure may be subject to some variation following publication of the new NPPF later in the year.

He explained that there were nevertheless some risks around delivery of the strategy, that the resulting distribution of development was not as identified in the draft settlement hierarchy and that some further opportunities might need to be identified particularly in the more constrained settlements where site identification

had been more challenging. The addition of some smaller sites was also likely to be desirable.

Councillor Ms M Prior raised concerns which had been expressed by Holt Town Council that there had been an expectation that 700 houses would be allocated for the town. There was also concern that Holt would no longer be designated as a primary settlement. The town was geared up for more housing and wanted to keep its current status.

The Planning Policy Manager explained that there remained a commitment to deliver housing growth. Development which had been completed and sites with planning permission during the current plan period amounted to 700 dwellings, most of which had not yet been built and the figure given in the document was additional to this. He explained that Holt did not have the same order of retail facilities or services as Cromer, Fakenham etc. Designation as a principal town would bring the risk of significantly greater development.

Councillor R Reynolds asked if there had been an assessment of the likelihood of windfall sites coming forward. He stated that issues of sustainability were often raised regarding windfall sites.

The Planning Policy Manager considered that there was virtue in including windfall growth without making specific allocations. It was necessary to assume that there would be a diminishing supply of windfall sites but there was confidence that some would come forward.

Councillor Ms V Gay supported a target of 9,000 dwellings. She considered that there were grounds to defend the windfall allowance as significant changes would be made to the policy for conversion of rural buildings, and the Council had a good record of delivering exception schemes with an aspiration to build more. She suggested that sites could be available for self-build dwellings.

The Planning Policy Manager explained that there would be a policy to support self-build but sites should be sustainable and there was no reason to depart from the settlement hierarchy.

Councillor Mrs V Uprichard asked if specialist accommodation would be included in the windfall allowance.

The Planning Policy Manager explained that certain types of elderly or specialist accommodation could be counted as part of the allocation and could be on either planned sites or windfall. Three bedspaces of specialist residential care equated to one dwelling.

In answer to a question by Councillor N Pearce as to whether the new NPPF was likely to affect a target of 9,000, the Planning Policy Manager explained it was possible that it could include a higher target and tighter delivery requirements.

Councillor R Reynolds considered that more in-depth discussion was required around additional allocations and a decision should not be made at this meeting.

The Planning Policy Manager suggested that a workshop session for all Members be arranged, followed by discussion at the Working Party.



Councillor Reynolds considered that any discussion should be within the confines of the Working Party.

Councillor Ms V Gay considered that a decision could be made at this meeting to indicate support for 9,000 dwellings. She stated that the site visits which had been undertaken by the Working Party clearly showed that there were opportunities for small sites. In North Walsham, however, the support for a large number of dwellings was conditional on very significant infrastructure support for the town and she considered that there would be little sympathy from residents for a strategy for small sites. She considered that it was important to weigh the risks and for Members to be clear in their own minds as developers were likely to challenge any approach.

Councillor Mrs V Uprichard expressed concern that the outcome of the Greens Road appeal could have an impact on allocations in North Walsham as the site was a key part of the strategy to achieve a bypass.

Councillor N Pearce asked whether a failure to deliver the large allocation at Fakenham could be used to support the provision on smaller sites and impact on the target of 9000 dwellings.

The Planning Policy Manager reiterated that the NPPF was highly likely to retain provisions relating to small site allocations and this area might need to be reconsidered. There was a concern that small sites in villages had actually proved to be difficult to deliver.

It was proposed by Councillor R Reynolds, seconded by Councillor Ms M Prior and

**RESOLVED**

**That discussion on site allocations be deferred until the next Working Party meeting, to which all Members will be invited.**

It was proposed by Councillor Ms M Prior, seconded by Councillor Ms V Gay and

**RESOLVED**

**That a target of 9000 dwellings is agreed as the preferred option for consultation and that an allowance for windfall of approximately 2000 dwellings is included within that figure.**

The meeting closed at 11.15 am.

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CHAIRMAN

**LOCAL PLAN – OPTIONAL TECHNICAL STANDARDS**

Summary: This report considers the evidence for introducing optional technical standards around accessible & adaptable dwellings and water efficiency.

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

Recommendations: **This report recommends that the Working Party recommend to Cabinet to develop a policy approach based around the adoption of Optional Technical Standards based on**

- a) **100% dwelling requirement for Optional M4(2) - Accessible and Adaptable dwellings;**
- b) **5% dwelling requirement on affordable properties for optional M4(3) - Wheelchair User Dwellings;**
- c) **Implementation of the Higher Water Efficiency standards across all new dwellings.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	
Iain Withington Planning Policy Team leader 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**1. Introduction**

1.1 It has historically been the case that the construction standards for dwellings have been enforced via both the National Building Regulations and the application of various national and local standards included in Local Plan policies including the national Code for Sustainable Homes, local energy performance standards, and in some areas local floor space standards. More recently government has increasingly sought to rationalise and streamline the process by progressively incorporating revised construction standards into the National Building Regulations. Following a national review and through a Ministerial Statement the Government introduced a new national policy approach which consolidated essential requirements into a national framework.

1.2 Key Outcomes included:

- New mandatory security standards through amended Building Regulations;
- Optional technical standards on accessible & adaptable properties & water efficiency;
- New national space standards — [nationally described space standard](#)<sup>1</sup>; (to be considered further in later report)
- Withdrawal of The Code for Sustainable Homes (aside from legacy cases)<sup>2</sup> and Lifetime Homes standards.

1.3 The national [Planning Practice Guidance](#), PPG clarifies that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and adaptability and water, and an optional nationally described space standard subject to appropriate evidence in order to justify the setting of appropriate policies in their Local Plans.

1.4 The accessible standards are technically referred to as M4(2) Accessible and Adaptable Dwellings and M4(3) Wheelchair User Dwellings. (Abbreviated to categories 2 and 3)

1.5 This remains in the recently updated NPPF through footnote 46 para 127 which states that:

*Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.*

1.6 These standards may only be introduced locally via the inclusion of policies in adopted Local Plans and any such policies may only be introduced if:

- There is evidence to support the need for them, and
- The additional costs associated with the enhanced standards have been tested in terms of their potential impacts on the viability of development.

1.7 This report summarises the evidence in regard to accessible & adaptable standards along with water efficiency measures that can be used to introduce these optional standards to North Norfolk, explains how this might impact on development viability and outlines which of the available standards are recommended for local introduction via a policy in the new Local Plan. As with other aspects of policy development the recommended approach together with any options discounted will then be subject to public consultation in the Draft Plan. A separate detailed topic paper relating to this subject is available and will be published to support future consultation. The intention is to continue to develop the evidence base in light of the remaining options around space standards.

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<sup>1</sup> <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

<sup>2</sup> those where residential developments are legally contracted to apply a code policy (e.g. affordable housing funded through the National Affordable Housing Programme 2015 to 2018, or earlier programme) or where planning permission has been granted subject to a condition stipulating discharge of a code level, and developers are not appealing the condition nor seeking to have it removed or varied

- 1.8 If introduced via the Local Plan compliance with the technical standards would be enforced via the Building Regulations process.

## 2. Evidence

- 2.1 In establishing the evidence base Local planning authorities can consider and take into account a wide range of published official statistics and factors, including:

- The accessibility and adaptability of existing housing stock;
- How needs vary across different housing tenures;
- The likely future need for housing for older and disabled people (including wheelchair user dwellings);
- Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);
- In relation to water use efficiency whether the area is one which is subject to water stress
- The overall impact on viability.

### 2.2 Accessibility and Adaptability of Existing Housing Stock (EHS)

The national EHS survey and census data around dwelling stock provides a useful but broad indication of the current accessibility and adaptability of the existing housing stock across North Norfolk. Based on the EHS visibility indicators, there is a lack of accessible and adaptable homes across all existing tenures. The greatest requirement, however, remains in the private sector which accounts for the largest existing percentage of dwellings and the majority of dwellings being delivered through the Local Plan.

- 2.3 Taking a broad and cautious assumption and applying the EHS estimate of 7% of homes being fully visitable and the number of households that contain at least one person over 65 years old, the current potential household need for fully accessible and adaptable properties has been identified as 15,669 households. Converting household need into dwellings indicates that there is an existing broad need for 18,176 adaptable and accessible dwellings before any future need is considered. In essence the existing housing stock is not fit for purpose in relation to accessibility.

- 2.4 Sub-national population projections show that North Norfolk has one of the highest over 65 population as a proportion of its total population and that this age cohort is growing rapidly. The 2014 and 2016 subnational population statistics coupled with the 2014 household projections all show that North Norfolk has a significantly aging population. Each statistical data set shows that there will be a significant increase in numbers, households and the proportion of the population aged over 65. Overall the 2016 sub national population forecasts project that the **percentage of people aged over 65 will increase from 32% in 2016 to 39.9% by the end of the plan period, 2036 and remain the fastest growing age cohort.** Conversely those of working age 20 – 65 are projected to significantly decrease by 2036, falling from 61,800, 59% of total population to 49,400, 44% of total population between 2016 and 2036. Age is one of the most significant, but not the only, determinant of a need for an accessible homes.

- 2.5 Using the household projections, current supply of accessible dwellings and future Local Plan growth it can be demonstrated that there is a net need as a proportion of Household increase over and above the emerging housing target approx. 332% of the local plan housing target<sup>3</sup> for adaptable and accessible homes for the over 65's.
- 2.6 In terms of health and wellbeing based on both census information and ONS projections it can be seen that as the population ages the number living alone increases as does the number of residents with long term health problems and or disabilities.
- 2.7 Evidence compiled around the specific localised requirements for wheelchair standards is compiled using a tool kit developed by Habinteg Housing Association in conjunction with the Town and Country Housing Association. A broad estimate for unmet housing need at a local authority level is calculated by inputting household projections data and applying the regional figures around the percentage of all households that are wheelchair user households.
- 2.8 Optional standards around increased adaptability and accessibility for wheelchair uses can only be applied where the local authority is responsible for allocating or nominating a person to live in that dwelling. Any requirement should only be based on the estimated proportion of households that live in affordable housing.
- 2.9 Utilising the Toolkit and applying the Districts projected household increase and averaged affordable housing rates it can be established that approximately. 5.9% of affordable housing would need to be wheelchair accessible to meet unmet and future wheelchair dwelling need in line with government expectations and policy.
- 2.10 The evidence base uses a number of sources, some of which are based on national percentages and applied at a local level while others are based on surveys, projections and third party analysis. Nevertheless overall the evidence presented is considered to provide a reasonable if broad basis to inform an approximation of need for the optional technical standards. All the evidence shows a similar pattern revealing a significant increase in the population age and overall proportion of over 65s, an increase in in numbers with mobility and health issues and a lack of supply across all tenures of suitable homes.
- 2.11 Key findings of the broad evidence review establish:
  - The majority of properties in North Norfolk are owner occupied;
  - A large historic deficit of accessible and adoptable properties exists (not fully visitable and require remedial work);
  - There is a lack of accessible and adaptable properties across all tenures but the greatest requirement remains in the private sector;
  - North Norfolk's Population is older than average, and is projected to age significantly. The proportion of those ages over 65 is projected to increase from 32% to 39%. (ONS 2016);

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<sup>3</sup> Figures based on an emerging target of 550dpa

- The higher age cohorts of over 80s are increasing at a faster rate than any other with the over 90s projected to increase by 100% by 2036;
- The proportion of those ages over 80 is projected to increase from 9% to 14%. (ONS 2016);
- The proportion of the population working is projected to fall from 59% to 44% by 2036. (ONS2016);
- By 2016 it is projected that there will be an additional 11,500 over 65s in the District;
- The increase in the older population will lead to an increase in health and disabilities. 24% of residents over 65 have a long term disability or health condition and the percentage is set to grow across all health related issues. Those with a health issue which limits daily activities in the over 65's is set to increase 49% from 6,643 to 9,906 by 2036;
- There will be a 40% increase in the number of older people living on their own, to 17,169 by 2036;
- Social care and public health strategies are placing less emphasis on placing people in residential care and more emphasis on supporting people in their own homes.

### **3 Potential Policy Approaches**

- 3.1 Based on the evidence there is a compelling need to increase the supply of accessible and adaptable properties across the District. Going forward the evidence supports the need to address the historic deficiency and future growth through requiring all new dwellings, (100%), irrespective of tenure to meet the Optional M4(2) - Accessible and Adaptable dwellings standard. Such a policy approach would increase the proportion of visitable housing stock and go some way as to meet the increased needs of the aging population.
- 3.2 Optional requirement M4(3) can only be applied where the local authority is responsible for nominating a person to live in that dwelling. The evidence estimates a wheelchair accessibility need (current and future) of approx. 6% of households that require affordable properties. Although this remains relatively low this could arguably be seen as a lower end of potential need range given the projected large increase in over 65 age cohorts and in particular the over 85's.
- 3.3 One such policy approach could be to seek 5% of wheelchair user dwellings on larger developments (20 or more affordable housing units) or more. This allows for the provision of one full unit and eliminates the need for fractions of dwellings of less than one unit. This requirement would in general fall to allocated sites which are proven to be in larger sustainable locations with access to higher order services.
- 3.4 In summary there is considered to be ample evidence to support the introduction of the M4(2) standard across all of the new housing stock in the

District and to support the introduction of the higher M4(3) wheelchair accessible standard in a minimum of 5% of the new affordable housing stock.

#### **4 Further Considerations (Viability)**

- 4.1 The evidence indicates that the introduction of these optional standards are justified in North Norfolk, however Local plans must also take account of viability.
- 4.2 The Governments own cost analysis indicated that category 2 standards increase development costs by £866 for a 3 bed property and £578 for a 2 bed terrace. This is approximately equivalent of an additional £9.31 per sqm for a 3 bed property and £7.32 for a 2 bed property once increase in value has been factored in. Meeting optional category 3 wheelchair standards would incur higher costs with an estimated increase of £6,931. (£59 per sqm increase based on 117sq m dwelling).
- 4.3 The emerging Local Plan Viability study takes into account all development values and costs, plan policy impact costs and makes an allowance for a competitive return to the landowner and developer. The study concludes that there is sufficient headroom across all areas and development typologies for new development to meet optional technical standard M(4(2) - Accessible and Adaptable dwellings.
- 4.4 The viability study demonstrates that there remains a significant viability cushion to accommodate other development costs. It remains reasonable and proportionate to conclude at this stage that there remains sufficient margin to accommodate a small percentage requirement for wheelchair access should a policy approach be adopted in this area. Though it is likely that further testing would be required to establish a robust position.

#### **5 Water Efficiency**

- 5.1 Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/person/per day).
- 5.2 The PPG advises that any clear need for the standards should be established based on consultation with the local water companies and primary sources of evidence such as Water Stress classifications produced by the Environment Agencies and River Basin Management Plans. Any policy requirement is subject to viability assessment.
- 5.3 The Anglian Water Area is classified as an area of Serious Stress by the Environment Agency and the introduction of the enhanced water efficiency standard is supported through the Anglian River Basin District River Basin Management Plan
- 5.4 The Norfolk Authorities have already agreed through the Duty to co-operate Framework that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person per day) for residential development.

- 5.5 The costs associated with the introduction of this standard are considered to be marginal are included in the emerging Local Plan Wide Viability assessment where they are covered by the adoption of the construction cost rates equivalent of level 4 of the now withdrawn Code for Sustainable Homes.

## **6 Recommendation**

This report recommends that the Working Party recommend to Cabinet to develop a policy approach based around the adoption of Optional Technical Standards based on

- a) 100% dwelling requirement for Optional M4(2) - Accessible and Adaptable dwellings;
- b) 5% dwelling requirement on affordable properties for optional M4(3) - Wheelchair User Dwellings;
- c) Implementation of the Higher Water Efficiency standards across all new dwellings.

## **7 Legal Implications and Risks**

- 7.1 The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches must complete Sustainability Appraisal, consider reasonable alternatives, and publish these for consultation before determining its final approach. Consultation on the options identified in this report is designed to fulfil these requirements.

## **8 Financial Implications and Risks**

- 8.1 Failure to undertake plan preparation in accordance with the regulations is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.



**Local Plan – Whole Plan Viability Assessment**

- Summary: This report considers the viability evidence supporting the Local Plan.
- Conclusions: In general terms, housing development proposed in all locations in the North Norfolk District Local Plan are broadly viable with affordable housing percentages of 45% and 25% across geographical zones identified
- Recommendations: **That the results of the study are noted and following industry engagement and any necessary amendment the study is published as part of the evidence base for Local Plan preparation.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	
Iain Withington Planning Policy Team leader 01263 516034 <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>	

**1. Introduction**

1.1 Viability considerations remain at the heart of the National Planning Policy Framework, NPPF and the production of the North Norfolk Plan Wide Viability Assessment is a key supporting document for the local Plan. The NPPF states:

*....The weight to be given to a viability assessment (in determining applications) is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available. Para 57*

1.2 The national [Planning Practice Guidance](#), PPG advises that:

*The role of viability assessment is primarily at the plan making stage, and that viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan...Drafting of plan policies should be iterative and informed by engagement with developers, landowners, and infrastructure and affordable housing providers. Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs*

*and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.*<sup>1</sup>

The PPG clarifies that policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106.<sup>2</sup>

- 1.3 Nationwide CIL Service NCS were commissioned to draft the Council's viability assessment for the emerging Local Plan. The purpose of this report is to advise members of the emerging findings ahead of a specific workshop with developers and site promoters later this month.
- 1.4 The purpose of the study was to appraise the viability of the North Norfolk District Local Plan in terms of the impact of its emerging policies on the economic viability of the development expected to be delivered during the Plan period. The study considers policies that might affect the cost and value of development e.g. Affordable Housing, Design and Construction Standards, likely planning obligation requirements, and takes account of local land values, build costs and infrastructure requirements. As a secondary outcome the study illustrates the potential to accommodate Community Infrastructure Levy Charges in the event the Council wishes to progress this process and in line with viability guidance.
- 1.5 In doing so the study comprises a number of key stages and is supported by appropriate available evidence informed by engagement with developers, landowners, and affordable housing providers.
  - Land & property valuation study;
  - Construction cost study;
  - Identification of sub-markets;
  - Policy impact assessments;
  - Land value benchmarking;
  - Viability appraisal;
  - Stakeholder engagement.
- 1.6 To define land value for any viability assessment, a benchmark land value is established on the basis of existing use value, EUV of the land, plus a premium for the landowner based on uplift value of gaining planning permission Guidance in the PPG says that:

*The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy requirements. This approach is often called 'existing use value plus' (EUV+).*<sup>3</sup>

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<sup>1</sup> Paragraph: 002 Reference ID: 10-002-20180724 Revision date 24.07.18

<sup>2</sup> PPG Paragraph: 001 Reference ID: 10-001-20180724 Revision date 24.07.18

<sup>3</sup> PPG Paragraph: 013 Reference ID: 10-013-20180724 Revision date 24.07.18

1.7 The approach adopted is one where the uplift in value resulting from planning permission should effectively be shared between the landowner (as a reasonable return to incentivise the release of land) and the Local Authority (as a margin to enable infrastructure and affordable housing contributions) on a 50:50 basis. This 50/50 split of the uplift in value is widely accepted as being appropriate and has become known as the Shinfield principle.

## 2 Results

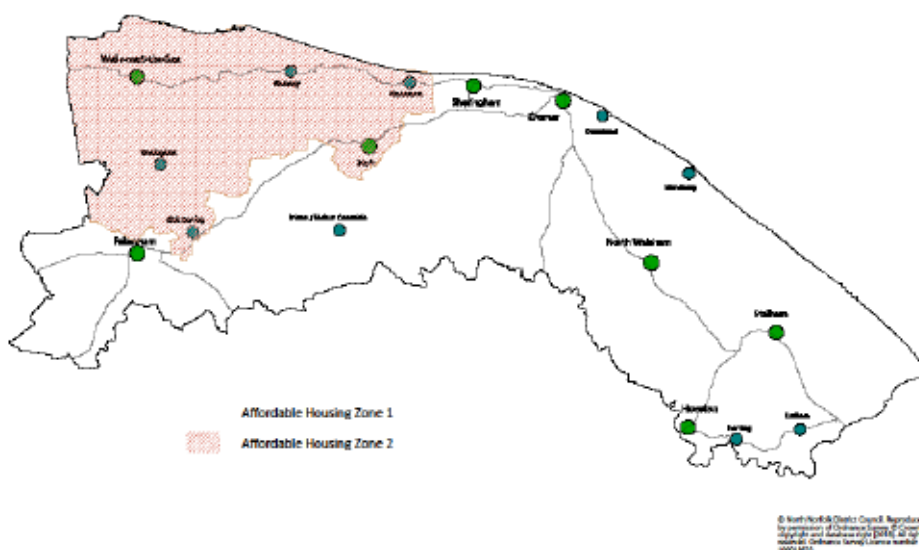
2.1 In general terms, housing development proposed in all locations in the North Norfolk District Local Plan would be broadly viable, can deliver a meaningful proportion of affordable homes 25-45% and, could for residential and retail development accommodate CIL charges in the event the Council wish to pursue CIL.

2.2 The assessments of residential land and property values indicated that there were significant differences in value across the District to justify the existence of sub-markets and should form the basis of any CIL charging Zones and the affordable housing policy.


2.3 It should be noted that this study should be seen as a strategic overview of plan level viability with the purpose of supporting plan preparation rather than as any specific interpretation of North Norfolk District Council policy on the viability of any individual site or application of planning policy to affordable housing, CIL or developer contributions. The study is a strategic assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. The study applies the general assumptions in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances.

2.4 In relation to affordable housing the study identifies the 45% affordable housing in zone 2 and 25% affordable housing in zone 1 remains deliverable across the emerging site typologies.

### Geographical Zones



- 2.5 In assessing the viable affordable housing percentages the study analysed the identified Strategic Housing Market Assessment tenure mix (20% Low Cost Home Ownership and 80 % Affordable Rent) and the emerging NPPF requirement of 10% homes to be available for affordable homes ownership<sup>4</sup>. In doing so the study adopted a tenure mixed based on shared equity and shared Ownership (rather than discounted homes for sale) which could arguably be said to represent the least valuable to developers and a worst case viability scenario.
- 2.6 The viability results are summarised in the table below. The figures represent the margin of viability per sqm taking account of all development values and costs, plan policy impact costs and having made allowance for a competitive return to the landowner and developer. In essence a positive margin confirms whole plan viability and the level of positive margin represents the potential to introduce additional developer contributions such as CIL

 <b>10% LCHO Mix</b> <b>Maximum Potential CIL Rates per Sqm</b>					
Sub-Market/Base Land Value	Edge Principal Town Large	Edge Principal Town Medium	Edge Service Centre	Village Edge	Village Infill
<b>Zone 1 – 25% Affordable</b>					
Greenfield	£123	£144	£145	£150	£147
Brownfield	£58	£76	£77	£83	£80
<b>Zone 2 - 45% Affordable</b>					
Greenfield	£254	£272	£272	£285	£257
Brownfield	£167	£182	£182	£188	£166

- 2.7 In relation to commercial development most of the commercial use class appraisals indicated negative viability and therefore no margin to introduce CIL charges. Only food supermarket and general retail demonstrated significant positive viability. Such results are typical and do not mean that commercial developments are less likely to happen, principally because commercial developers often retain the value of the asset (building) rather than selling to make a profit.
- 2.8 NCS considered that additional margin exists, beyond a reasonable return to the landowner and developer to accommodate potential residential CIL charges based on the geographical zones identified and in relation to general retail and food supermarkets across a single zone in the event that the Council wish to progress a CIL System. The estimated amount of CIL revenue taking into consideration the proposed development sites and typologies was £23,656,500 based on the below residential and retail rates. It should be noted that the figure remains an approximation based on a maximum of 6,300 dwellings and includes the exemption of affordable dwellings. No consideration is given to the impacts of applying a zero rate to any of the larger sites envisaged through the local plan at this stage.

<sup>4</sup> This has since been confirmed in the updated NPPF para 64

Potential Residential Cil	Affordable %	£ sqm
Zone 1 housing &c2/c3 retirement housing	25%	50
Zone 2 housing &c2/c3 retirement housing	45%	100
Zone 1 c2/c3 retirement apartments	25%	25
Zone 2 C2/C3 retirement apartments	40%	35
<b>Potential retail - District wide</b>		
A1-A5		50
Food Supermarket		100
<b>Non-residential uses( except retail)</b>		0

- 2.9 **Next stages.** A stake holder event is being held on 29<sup>th</sup> August to share the findings with the development industry and provide an opportunity to comment on the conclusions . The intention is that the study will inform policy making around affordable housing rates and support the Local plan through examination.

### 3 Recommendation

**That the results of the study are noted and following industry engagement and any necessary amendment the study is published as part of the evidence base for Local Plan preparation.**

### 4 Legal Implications and Risks

- 4.1 The Council must produce a Plan which complies with various regulatory and legal requirements. The Plan wide viability assessment is a key evidence document required to demonstrate deliverability. Publication of the Assessment will reduce the risks of legal or soundness challenges to the Local Plan.

### 5 Financial Implications and Risks

- 5.1 Failure to undertake plan preparation in accordance with the regulations is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

**PLANNING POLICY UPDATE – PUBLICATION OF NEW NATIONAL PLANNING POLICY FRAMEWORK**

**Summary:** This report provides a summary of the key provisions of the new National Planning Policy Framework and its likely impacts in relation to the on-going review of the North Norfolk Local Plan particularly in relation to housing provision.

**Conclusion** The new National Planning Policy Framework retains much of the thrust and detailed content of the earlier version but includes some significant changes in relation to housing provision, targets for delivery of growth and the types of sites which should be identified for residential development. These will need to be addressed as part of Local Plan preparation.

- Recommendations:**
- 1. That preparation of the draft plan proceeds on the basis that ‘up to’ 11,000 dwellings *may* be required.**
  - 2. That the plan identifies approx. 15 smaller sites of around 1 hectare for allocation *provided* such sites were put forward and are suitable for development.**
  - 3. That the additional large sites identified in Section 5 of the report are identified as provisional preferred options.**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Mark Ashwell, Planning Policy Manager, 01263 516325	

**1. Introduction**

- 1.1 The finalised version of the revised National Planning Policy Framework was issued by the Ministry of Housing, Communities and Local Government (MHCLG) on 24 July. This report provides a summary of the key provisions and main areas of change and highlights how this might impact on the on-going preparation of the new Local Plan.
- 1.2 The new Framework came into immediate effect on the date of its publication and replaces the 2012 Framework in full. There are some transitional arrangements which allow for Local Plans which are advanced in their preparation to continue to use the previous framework for a short period (6 months). This does not apply to North Norfolk’s Local Plan which will need to take full account of the new Framework in its preparation.

## 2. National Planning Policy Framework 2018 – Key provisions (Plan Making)

2.1 The framework extends to 72 pages and is wide ranging in its content covering the overarching principles of sustainable development, plan making, making planning decisions and detailed policy content in relation to issues such as delivering sufficient homes, building a strong economy, ensuring town centre vitality, design, transport, and conserving the natural and built environment. The revised Framework and associated documents are available here <https://www.gov.uk/government/collections/revised-national-planning-policy-framework>

2.2 This report principally focuses on the provisions relating to housing delivery and preparation of the new Local Plan.

2.3 The framework re-states the primacy of the development plan process and the importance of maintaining up to date Local Plans so that there is certainty and transparency in the decision making process. Much of the content and general thrust of the previous framework has been retained although there has been significant re drafting. **Table 1** includes details of the revised provisions in the left hand column with officer commentary to the right.

**Table 1 – Summary NPPF changes.**

Revised content	Officer Comments
<p><b>The introduction of a housing delivery test for local authorities in November this year.</b> This test will measure the number of homes created against local housing need requirements and penalise Councils that under deliver against various thresholds over a three-year period. This includes applying the presumption in favour of sustainable development where delivery is below 75 per cent of the housing requirement from 2020 onwards.</p>	<p>This is an additional test which sits alongside the Five Year Land Supply requirements. Five Year Land Supply is a measure of what is likely to be delivered in the <i>future</i> and the absence of a supply may render a Local Plan out of date. The Housing Delivery Test (HDT) is a measure of what has been delivered over the <i>preceding</i> three years.</p> <p>Where delivery falls below 95% of the requirement authorities must publish a formal Action Plan to identify the measures they intend to take to address the shortfall.</p> <p>Where delivery falls below 85% of the requirement a 20% buffer must be added to Five Year Land Supply requirements.</p> <p>From 2020 if delivery falls to below 75% of the requirement an authority will be deemed to be providing too few homes and the presumption in favour of sustainable development (the so called ‘tilted balance’) will automatically be applied to the determination of planning applications irrespective of whether proposals comply with locally adopted policies.</p>

	<p>In recent years North Norfolk has delivered 100% of the housing requirement included in the adopted Core Strategy. This is unlikely to remain the case when the higher requirements introduced elsewhere in the new Framework are introduced and there is a risk that delivery will fall below the 85% threshold. It is unlikely that housing delivery in the District will fall below the 75% threshold.</p>
<p><b>The introduction of a new standardised method of calculating housing need.</b> The method uses the government's household growth projections published by the Office of National Statistics and applies an affordability ratio to the figures, comparing local house prices with workplace earnings, to produce a need figure. The government hopes the method will end protracted wranglings on the issue during local plan examinations. However, the MHCLG, in its consultation response, said it will consider adjusting the methodology (again) in order to meet its 300,000-homes-a-year target in light of the impending publication of new household growth projections that are likely to be lower than previous estimates. It will "consult on the specific details" when the new projection figures are published in September.</p>	<p>The standard methodology replaces (in large part) the process of preparing Strategic Housing Market Assessments although these will still be required and when applied in North Norfolk produces a new requirement to deliver a substantially greater number of dwellings increasing the current requirement for 409 dwellings per annum to 538. It had been expected that this figure would reduce as a consequence of lower population growth forecasts but government has made clear its intention to review and consult further on the methodology to ensure it produces higher growth requirements. Further adjustment to the methodology is likely to be controversial not least because what is being suggested appears to depart from the evidence based approach which government previously endorsed.</p> <p>This introduces significant uncertainty and risks around the preparation of the Local Plan which is being prepared against the backdrop of almost continually changing housing requirements - two of the inputs into the new methodology, namely, the household forecasts and the affordability ratios that are applied change on a bi annual and annual basis respectively and now government intends to consult on further changes.</p> <p>The statement that government intends to review the methodology again <i>in order</i> to deliver 300,000 dwellings per year nationally is a clear signal that housing targets are very likely to need to be increased further. This issue is considered further below.</p>



<p><b>Local plans and spatial development strategies must, as a minimum, "seek to meet the area's objectively assessed needs" to be declared sound.</b></p>	<p>This phrase reinforces the soundness test laid down in paragraph 35 of the finalised framework, which requires plans that are positively prepared, justified, effective and consistent with national policy. A footnote adds that, for housing policies, such needs should be assessed using a clear and justified method. Paragraph 60. says that, in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment conducted using a standard method to be prescribed in national planning guidance, "unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals". It adds: "In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."</p>
<p><b>At least 10% of homes on larger sites to be affordable home ownership.</b></p>	<p>'Affordable Home Ownership' would include shared equity, shared ownership, discounted market sales and the new affordable type 'Starter Homes' (20% discount). The evidence (local median household Incomes) would suggest that neither Starter Homes or discounted market products are likely to make any meaningful contribution to meeting the needs of those on lower incomes unless discounts on open market value are significant. The Council's position in relation to affordable housing (% and tenure mix) is yet to be agreed so this new requirement will need to be taken into account in preparing draft policies for consultation.</p>
<p><b>The reinstatement of "social rent" in the NPPF's definition of affordable housing.</b></p>	<p>Social rent was defined in the 2012 NPPF as a specific affordable housing type which set the rent that could be charged at 60% of the local market rent. In recent years Housing Associations have favoured <i>affordable</i> rents which are set at <b>not more than</b> 80% of the market equivalent. The term <i>social</i> rent had been omitted from March's draft consultation version prompting concerns from some providers. This change is to be welcomed and makes clear that Social Rent remains an acceptable form of affordable housing provision.</p>

<p><b>Great weight should be given to the delivery of windfall sites within existing settlements.</b></p>	<p>Whether this provision is intended to relate to all settlements or just those selected for development is unclear but given that the NPPF also supports the sub division of properties in the countryside and the re-use of existing buildings (barn conversions) a more permissive approach to infill developments in some villages than is currently the case appears justified.</p>
<p><b>A small sites requirement in the draft NPPF has been retained but in a modified form.</b> The new NPPF says councils must accommodate ten per cent of their housing requirement on small sites, with small sites being defined as not more than 1 hectare in size.</p>	<p>This provision is intended to ensure that smaller builders are provided the opportunity to deliver homes. The principle of smaller development sites being available is widely supported although there are concerns, including in North Norfolk, that there is little local capacity to deliver such schemes. Small sites had previously been available via windfall opportunities and were not specifically allocated in the current Local Plan.</p> <p>The NPPF appears to go further and requires that authorities <i>'identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare.</i></p> <p>This would seem suggest that it may be necessary to formally allocate small sites for 10% of required growth. To date very few sites of this size are currently identified in the emerging plan as provisional preferred options. (further discussion below)</p>
<p><b>The importance of design standards is emphasised.</b></p>	<p>The creation of high-quality buildings and places is 'fundamental' to what the planning and development process should achieve, the revised NPPF states. In particular, councils should try to "ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme.</p>
<p><b>The glossary of the new framework confirms the revised definition of "deliverable" housing sites set out in the March draft, apart from one minor clarification.</b></p>	<p>Sites which are included within the five year land supply must be deliverable. The definition states that sites with detailed planning permission "should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years". Sites with</p>

	<p>outline planning permission, permission in principle, allocated in the development plan or identified on brownfield registers should only be considered deliverable "where there is clear evidence that housing completions will begin on site within five years", it says.</p> <p>This approach to delivery is already adopted by North Norfolk in the preparation of Five Year Land Supply Statements and is unlikely to make any material difference to the deliverable land supply position in the District.</p>
<p><b>Larger-scale developments must be well located and designed and supported by the necessary infrastructure and facilities.</b> This proviso appears in paragraph 72 of the finalised framework, which backs options such as new settlements and "significant extensions" to existing towns and villages as ways in which the supply of large numbers of new homes "can often be best achieved". Newly added guidance says that before proposing such development, strategic policy-makers should consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains. It requires planning authorities to ensure that the size and location of such developments will support a sustainable community, make a "realistic assessment" of likely delivery rates and identify opportunities for supporting rapid implementation, "such as through joint ventures or locally led development corporations".</p>	<p>This is welcome clarification and describes precisely the Councils approach at North Walsham where large scale growth is dependent upon a clear demonstration of deliverability of an attractive sustainable development.</p>
<p><b>Plan reviews will be needed at least every five years where local housing need figures have or look set to "change significantly".</b> Paragraph 33 of the finalised framework says: "Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future." This appears to be a less stringent review requirement than proposed in the March draft, which referred only to actual or anticipated "increases" in housing need figures.</p>	<p>This is <b>not</b> a requirement to produce a new Local Plan every five years. Instead Councils will need to formally review whether a Plan remains fit for purpose particularly in relation to housing delivery and say what they intend to do about it if the plan becomes out of date.</p>

<p><b>New style ‘exceptions’ policy introduced.</b></p>	<p>The former NPPF included provisions allowing for the delivery of ‘rural exception sites’ for affordable homes where a local need was demonstrated. These provisions are retained in the new framework. In <i>addition</i> para 71 of the new Framework states that Local Authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home). These should be on unallocated sites, adjacent to existing settlements, be proportionate in size (not increase the size of the settlement by more than 5%) and should not be located in the AONB.</p> <p>There are some concerns that this type of development may be seen as preferable to conventional rural exceptions developments as they may produce better returns for both the land owner and developer and therefore reduce the supply of land available for other types of affordable homes.</p>
<p><b>Sub division of dwellings in Countryside should be permitted.</b></p>	<p>The NPPF had previously stated that isolated dwellings in the Countryside should be avoided and many authorities, including North Norfolk, had resisted sub division of existing homes citing this provision. The new NPPF still includes a requirement to avoid isolated dwellings in the Countryside but now adds subdivision to a short list of exceptions to this rule.</p> <p>This provision has the potential to increase the supply of windfall developments in the district.</p>
<p><b>No need to identify Primary and Secondary shopping frontages.</b></p>	<p>A common feature in retail planning has been the identification of Primary and Secondary retail frontages. These are policy tools used to ensure that Primary frontages retain a high proportion of A class retail uses with more flexibility in Secondary frontages. The NPPF no longer ‘requires’ these to be identified in favour of more flexible approaches to town centre management policies. The implications of this will need to be considered in the retail policies of the new Local Plan.</p>

### 3. Implications and Risks for Local Plan Preparation.

3.1 In some respects the timing of the publication of the new NPPF is helpful. It allows for adjustments to be made to the emerging Local Plan before it is subject to the first significant round of public consultation in the new year. For example, the provisions relating to affordable housing, retail policies and design are all areas where the draft plan position is yet to be settled. However, in at least two specific areas the NPPF introduces significant new requirements and risks.

3.2 Firstly, it remains unclear what the overall housing target should be. This is likely to be the most contentious element of any new plan and will be a matter which will receive significant scrutiny via the examination process. Failure to plan for the right quantity of growth is highly likely to lead to a finding that a plan is unsound and although such a risk can be mitigated (for example, making a commitment to early review of a plan) it is preferable to demonstrate how the Authority has proactively and positively sought to address all likely development needs. Indeed, a Plan which is positively prepared to address development needs is one of the soundness tests and the new framework has linked the delivery of sufficient homes to the test.

3.3 The NPPF has now introduced a new standard methodology for assessing housing need and it is clear that this must be used as the *starting point* for determining how much growth is required. However, Government has also said that the methodology will be reviewed further *with a view to ensuring* that 300,000 homes can be delivered per year nationally. This review will not commence until after September when the impacts of new Household Projections which are expected to show a significant slowing down in the rate of household growth are known.

3.4 Notwithstanding this expected slowdown government has made clear its position that any revision to the methodology will be undertaken to ensure that higher levels of growth are produced. As any new approach will be subject to further consultation it seems unlikely that a final position will be known for some months and potentially not until after the date when draft Local Plan consultation is anticipated.

3.5 At the February Working Party it was resolved to prepare the consultation version of the Local Plan on the basis that it should aim to deliver not less than 9,000 dwellings (450 per year) and this was re-affirmed at the last Working Party. Whilst this figure would meet the requirements of the new standard methodology *when applied today* it appears highly likely that this will not remain the case following the further review proposed by government. At this stage in plan preparation it would be prudent to assume that by the time of plan examination a higher housing target is likely to be required. The extent of any further increase in requirements will be determined by any revisions to the methodology. In the existing methodology government has capped the size of any increase for individual authorities to no more than 40% above household forecasts and it is to be hoped that this upper cap would remain in any revised approach. If this were to be the case the resulting requirement would be for around 550 dwellings per year, or **around 2,000 dwellings more than the draft plan currently proposes.**

3.6 The second area of change relates to the small sites requirements. The consultation draft of the NPPF had included provisions that 20% of allocations (1 in five sites) should be small sites of no more than half a hectare. In response to the consultation many authorities and others said this requirement was too onerous, that 20% was too high and that half a hectare was too small. The revised NPPF requires 10% of the requirement to be provided on small sites of no more than one hectare in size. Assuming the term 'requirement' means that part of the planned

growth left to be allocated on the date of plan adoption this would translate into around 400-450 dwellings on approx. 15 separate sites no larger than one hectare. **These sites have not yet been identified in the emerging plan.**

#### 4. What's in the draft plan, what more needs to be done in relation to housing numbers?

4.1 The provisional sites identified to date (**Table 2**) would be capable of delivering approximately 3,500-4,000 dwellings, depending on the density of development and other land uses to be accommodated on each site, and when added to the other sources of housing supply over the plan period (built, commitment and windfall) would provide for the 9,000 additional homes agreed at the February Working Party. However:

- The overall housing target of 9,000 dwellings may increase to as much as 11,000 as a result of the pending review of the standard housing needs methodology.
- Some of the sites identified are large, particularly at Fakenham and North Walsham, and delivery in the short term (early years of the plan period), may prove to be difficult. Early delivery to ensure maintenance of a five year supply is an important consideration.
- Some of the sites identified might be subject to public opposition and objections as part of the consultation process and may not proceed into the final plan.
- Insufficient small sites have been identified to meet NPPF requirements.
- The distribution of growth which would result from the provisional preferred sites which have been identified so far does not fully accord with the draft spatial strategy with slightly less growth proposed in Cromer, Sheringham, Wells and Holt and more in North Walsham and Fakenham. (Table 3)
- No specific provision has been made so far for specialist elderly accommodation although this issue could be partly addressed via the large mixed use allocations.

**Table 2 – Provisional sites identified for consultation**

Site Ref	Site Name	Settlement	Proposed Number of Dwellings (Low)	Proposed Number of Dwellings (High)
BLA04/A	Land East of Langham Road	Blakeney	30	30
BRI01	Land East of Astley School	Briston	30	40

BRI02	Land West of Astley School	Briston	30	50
C07/2	Land Gurney' s Wood, Norwich Road.	Cromer	22	22
C10/1	Land at Runton Road / Clifton Park	Cromer	90	90
C22/1	Land West of Pine Tree Farm	Cromer	300	300
F01/2	Land North of Rudham Stile Lane	Fakenham		
F01/B	Land North of Rudham Stile Lane	Fakenham	560	560
F03	Land at Junction of A148 and B1146	Fakenham	65	65
F10	Land South of Barons Close	Fakenham	35	55
H04	Land South of Lodge Close	Holt	100	120
H17	Land North of Valley Lane	Holt	20	30
H19/1	Land West Of Norwich Road	Holt	50	50
H20/1	Land at Heath Farm	Holt	100	150
HV01	Land East of Tunstead Road	Hoveton	100	160
LUD01A	Land South Of School Road	Ludham	10	20

LUD06	Land South Of Grange Road	Ludham	10	20
MUN04/A	Land Off Links Road	Mundesley	40	50
NW62	Western Extension	North Walsham	1500	2000
NW01/A	Land at Norwich Road & Nursery Drive	North Walsham	160	160
SH18/1	Land South of Butts Lane	Sheringham	50	80
SH04	Land adjoining Seaview Crescent	Sheringham	25	45
ST19	Land Adjacent Ingham Road	Stalham	70	70
ST23	Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Stalham	60	80
W01	Land To Rear of Market Lane	Wells-next-the-Sea	20	20
W07/1	Land Adjacent Holkham Road	Wells-next-the-Sea	50	60
Totals			3527	4327



**Table 3 – Draft growth strategy compared to provisional site options identified to-date**

Draft dwelling numbers required in draft preferred strategy	Potential dwellings on provisional preferred options
<p><b>LARGE GROWTH TOWNS TOTAL – 2,600</b></p> <p><b>North Walsham</b> – 1,500</p> <p><b>Fakenham</b> 600 in addition to 900 already allocated.</p> <p><b>Cromer</b> 500</p>	<p><b>TOTAL 2,732</b></p> <p><b>North Walsham</b> – 1,660</p> <p><b>Fakenham</b> -660</p> <p><b>Cromer</b>- 412</p>
<p><b>Secondary Growth Settlements Total -700</b></p> <p><b>Wells</b> 100</p> <p><b>Sheringham</b> 100</p> <p><b>Stalham</b> 100</p> <p><b>Hoveton</b> 100</p> <p><b>Holt</b> 300 +Primary School</p>	<p><b>Total 615</b></p> <p>Wells – 70</p> <p>Sheringham -75</p> <p>Stalham – 130</p> <p>Hoveton – 100</p> <p>Holt - 270</p>
<p>Briston and Mundesley –up to 50 if suitable sites can be identified.</p> <p>Ludham, and Blakeney –up to 30 in each subject to site suitability.</p>	<p>140 across the four villages.</p>

4.2 Taken overall, it is considered desirable at this stage to identify more sites for consultation purposes. This should include a number (approx. 15) of smaller sites and in the first instance additional opportunities in Cromer, Sheringham, Holt and ideally Wells provided suitable sites can be identified. These two measures and a modest upwards adjustment to the windfall allowance to reflect the NPPFs more permissive approach to such developments would provide options for around 11,000 dwellings (**Table 4**). This figure will need to be subject to review following potential further amendments to the standard housing needs methodology.

**TABLE 4 – Sources of potential growth to 2036**

	Source of dwellings	Quantity	Notes
a.	Built on date of plan adoption	1,600	Estimated completions between April 2016-2019
b.	With permission on date of plan adoption	2,000	Permissions on hand in April 2019
c.	Windfall allowance	2,600	Annual allowance for plan period
d.	Provisional Allocations identified to date	3,700	At mid range density assumption
e.	Proposed small sites allocation	450	New provisional allocations yet to be identified
f.	Additional larger sites in Cromer, Sheringham, Holt and Wells	650	New provisional allocations yet to be identified.
g.	Total	11,000	Subject to review when revised methodology published.

## 5. Potential further sites for consultation.

5.1 Subject to Working Party agreement that it is desirable to identify further sites for public consultation there are a small number which have been previously discounted that could be reconsidered. Of these Officers consider that the following represent the best options:

**1. Overstrand Road, Cromer (former golf practice ground).** This has previously been discounted on landscape impact grounds but is otherwise a well located site with good access to day to day services. If allocated it could accommodate around 200-250 dwellings and would be a good location for specialist elderly provision.

**2. Enlargement of the Hempstead Road proposals at Holt.** Previously earmarked for between 100-150 further dwellings in addition to what is already approved this site could be enlarged with little impact. However only modest further growth is recommended in Holt perhaps increasing the upper end of the acceptable range by a further 50-70 dwellings. This site could similarly include specialist elderly provision although the other sites previously identified in the town may be preferable locations (Valley Road in particular is very central as would be any redevelopment of the existing Primary School site)

**3. Increase in the numbers attributed to the large strategic allocation at North Walsham.** This site is very large and could comfortably deliver more growth without compromising the Council's requirement to deliver comprehensive and attractive development supported by appropriate infrastructure.

**4. Sheringham former allotment site adjacent to Splash.** Previously discounted on landscape and locational grounds this site lies in a sensitive and prominent location but there are few if any alternative locations in the town. A well designed principally single storey development with high quality landscaping would go some way to address landscape impacts. The site could be suitable for around 40 dwellings.

### **Recommendations**

- 1. That preparation of the draft plan proceeds on the basis that 'up to' 11,000 dwellings may be required.**
- 2. That the plan identifies approx. 15 smaller sites of around 1 hectare for allocation provided such sites were put forward and are suitable for development.**
- 3. That the additional large sites identified in Section 5 are identified as provisional preferred options for consultation.**