

# Planning Policy & Built Heritage Working Party

**Please Contact:** Linda Yarham

**Please email:** [linda.yarham@north-norfolk.gov.uk](mailto:linda.yarham@north-norfolk.gov.uk)

**Direct Dial:** 01263 516019

3 January 2019

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 14 January 2019 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, Ms V Gay, Mrs A Green, Mrs P Grove-Jones, Mr N Pearce, Mr J Punchard, Ms M Prior, Mr R Reynolds, Mr S Shaw, Mr R Shepherd, Mrs V Uprichard, D Young

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

## 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 10 December 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 – DRAFT APPROACH TO GROWTH IN VILLAGES

Page 9

(Appendix A – page 64)

Summary: This report considers the policies that could be included in the new Local Plan in relation to housing growth in villages. It includes a revised policy for rural exceptions developments.

Conclusions The approaches/policies identified in this report are being presented as drafts for public consultation.

Recommendations:

- 1. That the additional villages identified in Table 1 are identified as preferred settlements for small scale growth delivered via infill development within defined development boundaries, small allocations (subject to site availability and suitability) and the continued application of a rural exceptions policy for affordable homes.**
- 2. That the revised Rural Exceptions Policy in Appendix A is published for consultation.**

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

**8. LOCAL PLAN COASTAL POLICIES – DRAFT POLICIES FOR CONSULTATION**

Summary: This report considers the policies that could be included in the new Local Plan in relation to the Coast. It suggests three separate policies covering:

- *Undeveloped Coast Policy* – keeping a defined undeveloped coast area free of unnecessary development.
- *Coastal Erosion Policy*– minimising development within coastal erosion risk areas.
- *Coastal Adaptation Policy*– Allowing for replacement developments which are at risk from coastal erosion to an alternative location (roll back policy).

Conclusions The policies identified in this report are being presented as drafts for public consultation.

Recommendations: **Members consider the contents of this report and confirm the provisional preferred policy approach’s to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

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

**9. NORTH NORFOLK DESIGN GUIDE - SUPPLEMENTARY PLANNING DOCUMENT FOR INCLUSION ALONGSIDE THE EMERGING FIRST DRAFT LOCAL PLAN (CONSULTATION VERSION)**

Summary: This report seeks approval for the draft North Norfolk Design Guide (SPD) to be included alongside the First Draft Plan (Reg.18) which will be subject to public consultation next year. The report provides further information on the design guide and gives Members the opportunity to view the guide in its draft format. This report also seeks approval for the draft design policies to be included within the emerging Local Plan.

- Recommendations:
1. **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
  2. **The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**
  3. **That the guide be subject to a minimum six-week public consultation period alongside the emerging Local Plan**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Paul Rhymes, Conservation and Design Officer, 01263 516367, <a href="mailto:paul.rhymes@north-norfolk.gov.uk">paul.rhymes@north-norfolk.gov.uk</a> James Mann. Senior Planning Policy Officer, 01263 516404, <a href="mailto:james.mann@north-norfolk.gov.uk">james.mann@north-norfolk.gov.uk</a>	

## 10. APPROACH TO TOWN CENTRES AND RETAIL

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(Appendix A – page 64)

Summary: This report considers the draft policy approach to be taken in the new Local Plan in relation to Town Centres and Retail

Recommendations: **1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**

**2.The final policy wording and content of the consultation document is delegated to the Planning Policy Manager,**

Cabinet Member(s)	Ward(s) affected
All Members	All
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>	

## 11. LOCAL PLAN – TOURISM

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(Appendix A – page 64)

Summary: This report considers the draft policy approaches to be taken in the new Local Plan in relation to tourism. It recommends draft policies for public consultation.

Recommendations: **Members consider the contents of this report and confirm the provisional preferred policy approaches in the Appendix to be included within the First Draft Local Plan for consultation.**

**That the final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:  Martha Moore, Senior Planning Policy Officer, 01263 516084, <a href="mailto:martha.moore@north-norfolk.gov.uk">martha.moore@north-norfolk.gov.uk</a>	

## 12. APPROACH TO THE NATURAL AND BUILT ENVIRONMENT

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(Appendix A – page 64)

**Summary:** This report considers parts of the draft policy approach to be taken in the new Local Plan in relation to the natural and built environment. It recommends a number of draft policies for public consultation.

**Recommendations:**

- 1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
- 2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All
Contact Officer, telephone number and email: Sarah Tudhope, Senior Planning Officer – 01263 516011 <a href="mailto:sarah.tudhope@north-norfolk.gov.uk">sarah.tudhope@north-norfolk.gov.uk</a>	

## 13. LOCAL PLAN – APPROACH TO GREEN INFRASTRUCTURE

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**Summary:** This report considers the draft policy approach to be taken in relation to Green Infrastructure.

**Recommendations:**

- Members consider the contents of this report and confirm the approach to Green Infrastructure and the draft policy to be included within the First Draft Local Plan for consultation.**
- The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	<b>Ward(s) affected</b>
All Members	<b>All Wards</b>
Contact Officer, telephone number and email: Stuart Harrison, Senior Planning Officer. 01263 513308. <a href="mailto:stuart.harrison@north-norfolk.gov.uk">stuart.harrison@north-norfolk.gov.uk</a>	

**14. LOCAL PLAN PREPARATION – RENEWABLE ENERGY**

Summary: This report considers the draft policy approach to be taken in the new Local Plan in relation to renewable energy. It recommends a draft policy for public consultation.

Recommendations: **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Jodie Rhymes, Senior Planning Officer - 01263 516304 <a href="mailto:Jodie.Rhymes@north-norfolk.gov.uk">Jodie.Rhymes@north-norfolk.gov.uk</a> Iain Withington, Planning Policy Team Leader, 01263 516034, <a href="mailto:Iain.Withington@north-norfolk.gov.uk">Iain.Withington@north-norfolk.gov.uk</a>	

**15. FIRST DRAFT LOCAL PLAN (PART 1) CONSULTATION: COMMUNICATIONS & ENGAGEMENT PLAN**

Summary: This report seeks to agree the consultation arrangements for First Draft Local Plan (Part 1).

Recommendations: **That the Working Party recommend to Cabinet to agree the Communications & Engagement Plan as the basis for conducting public consultation on the First Draft Local Plan (Part 1), Supplementary Planning Documents (SPDs), and supporting documents.**

**To delegate final decisions as to which promotional tasks and events are carried out to the Planning Policy Manager.**

<b>Cabinet Member(s)</b>	<b>Ward(s) affected</b>
All Members	All Wards
<b>Contact Officer, telephone number and email:</b>  Iain Withington, Planning Policy Team Leader <a href="mailto:Iain.withington@north-Norfolk.gov.uk">Iain.withington@north-Norfolk.gov.uk</a> Chris Brown, Project Support Officer <a href="mailto:chris.brown@north-norfolk.gov.uk">chris.brown@north-norfolk.gov.uk</a> (01263 516318)	

**16. 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.”

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

**10 DECEMBER 2018**

Minutes of a meeting of the **PLANNING POLICY & BUILT HERITAGE WORKING PARTY** held in the Council Chamber, Council Offices, Holt Road, Cromer at 9.30 am when there were present:

Councillors

Ms V Gay (Chairman)

Mrs S Arnold	J Punchard
Mrs A Green	S Shaw
Mrs P Grove-Jones	R Shepherd
N Pearce	D Young
Ms M Prior	

Mrs S Bütikofer – substitute for Mrs V Uprichard

Observers:

Mrs A Fitch-Tillett  
M Knowles  
J Rest  
B Smith

Officers

Mr M Ashwell – Planning Policy Manager  
Mr I Withington – Planning Policy Team Leader  
Mr S Harrison – Senior Planning Officer  
Mr J Mann - Senior Planning Officer  
Mrs M Moore – Senior Planning Officer  
Mrs J Rhymes – Senior Planning Officer

**55. APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors R Reynolds and Mrs V Uprichard.

Councillors N Dixon and Mrs A Claussen-Reynolds, who were not Working Party members, had also tendered their apologies.

**56. CHAIRMAN'S ANNOUNCEMENT**

Councillor Ms V Gay paid tribute to Councillor Mrs S Arnold, the former Chairman of the Working Party, and stated that she would do her best to follow Councillor Mrs Arnold's example in chairing the meeting in an open and civil manner.

**56. PUBLIC QUESTIONS**

None.



**57. MINUTES**

The Minutes of the meeting held on 12 November 2018 were approved as a correct record and signed by the Chairman.

**58. ITEMS OF URGENT BUSINESS**

None.

**59. DECLARATIONS OF INTEREST**

None.

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

The Planning Policy Manager reported that the Government had not yet published the housing delivery test results, which would provide information on the Council's performance against its targets. This would be extremely important in terms of the Council's 5 year land supply position. A report would be brought to the Working Party once the results were published.

**61. LOCAL PLAN PREPARATION – HOUSING MIX POLICIES**

The Planning Policy Manager presented a report which considered the policy approaches to be taken in the new Local Plan in relation to dwellings sizes, tenures, affordability, self-build, and specialist elderly person's accommodation, and recommended draft policies for public consultation.

Councillor D Young asked if it was intended to split the dwelling types between two and three bedroom dwellings, as the policy as drafted would allow developers to build 100% three-bed dwellings, rather than two-bed which were less attractive to build.

The Planning Policy Manager explained that the dwelling types had not been split in order to prevent the policy being too prescriptive. It also took a view over the entire district as some developers would only build two-bed and some only three-bed. However, the mix could be broken down into proportions of each type and evidence was available to support it. In viability terms, two and three bed dwellings were very similar.

Councillor Mrs P Grove-Jones asked if there was anything to prevent developers building on two separate plots in close proximity to each other to avoid planning obligations.

The Planning Policy Manager explained that plots could not be linked unless they were conjoined. He suggested that it could be made clear in the preamble to the policy that the policy would be applied in all circumstances and to make developers aware that low densities and subdivision of plots would not be supported.

**It was proposed by Councillor Mrs P Grove-Jones, seconded by Councillor D Young and RESOLVED that the preamble to the policy be made more explicit.**

Councillor J Punchard expressed concern that the requirement for self-build plots to be kept available for a period of time would stifle development. He considered that

the original developer would not want to return to the site to build one dwelling In the event of the plot not being sold.

The Planning Policy Manager stated that it would be to the Council's advantage if the self-build plot was held for a longer time. Developers considered that it was more advantageous to sell a building plot than build on it themselves. The proposed approach would discharge the Council's duty with regard to self-build plots.

Councillor J Rest requested clarification of the policy wording as it used the terms "housing", "properties", "homes" and "dwellings".

The Planning Policy Manager stated that "housing" encapsulated all types of housing and the policy wording could be rationalised to ensure the same term was used throughout.

Councillor D Young referred to the requirement to provide specialist care facilities in developments of over 151 dwellings and each additional 300 dwellings, which resulted in a requirement of 60 units on developments up to 450 dwellings which rose to 120 units for a development of 451 dwellings, which he considered was very large step.

The Planning Policy Manager explained that the draft policy should refer to 80 bed spaces and not 60. This was in line with the current position in the industry. The provision did not have to be in one block and could be expressed as a quantum.

**Following discussion it was proposed by Councillor J Punchard, seconded by Councillor D Young and RESOLVED that for developments of over 151 dwellings, a requirement for the provision of 80 bed spaces be introduced for the first 150 additional dwellings and an additional 40 bed spaces for every 150 dwellings thereafter.**

Councillor D Young referred to the delivery of affordable homes. He stated that starter homes were not affordable in the District and asked if other types of tenure which were more affordable could be provided instead.

The Planning Policy Manager stated that the exclusion of starter homes was not supported by evidence or the NPPF and this approach was unlikely to be supported by the Inspector. The discount offered on starter homes needed to be controlled through policy and should be large enough to make them affordable.

The Chairman asked if the Planning Policy Manager was satisfied with the affordable housing policy zones.

The Planning Policy Manager stated that the viability consultant had considered the two zones, which were broadly defensible, but he was not satisfied as there were some settlements in the east of the District where property values were quite high. The zones would be remapped to take account of these higher values. It was possible that three zones could be included in the final policy, which would need to be supported by evidence. He stated that regardless of the policies which were set, developers would continue to argue viability. The District-wide viability assessment considered site typologies. It was not possible to consider individual sites which were unknown.

Councillor Ms M Prior stated that developers had not built sufficient, if any, truly affordable properties for sale. She referred to towns such as Holt which had a

distinct mix of people and considered that those who had lived there the longest would be penalised.

It was proposed by Councillor Ms V Gay, seconded by Councillor D Young and

## **RESOLVED**

- 1. That the housing mix/types policies in Appendix A are published for public consultation as part of the draft Local Plan.**
- 2. That the precise draft policy wording is delegated to the Planning Policy Manager.**

## **62. LOCAL PLAN – APPROACH TO EMPLOYMENT LAND**

The Senior Planning Officers (JM, SH and JR) presented a report which addressed issues relating to

- The quality and suitability of existing Employment Areas;
- the quantum of proposed allocations;
- the policy approach to designated Employment Areas and proposed allocations; and
- the policy approach to employment outside of designated Employment Areas and employment allocations.

Councillor Mrs S Arnold asked what the plans were for the former Crane Fruehauf and Marricks Ropes sites at North Walsham.

The Senior Planning Officer (SH) explained that part of the site had been included, but not in its entirety as only part had been put forward in the call for sites. It was necessary to ensure that any development to the north of Cromer Road was serviced by improved highway access so the proposed allocations could help to bring forward other parcels of land which were outside the allocation.

Councillor Arnold stated that the sites had been a blight on the landscape for many years. She considered that definite proposals should be made in the Local Plan to ensure improvements to the area.

The Planning Policy Manager suggested an additional policy requirement to ensure that the masterplan should clearly demonstrate improvements to the visual appearance of the edge of the town.

It was proposed by Councillor Ms V Gay, seconded by Councillor Mrs S Arnold and **RESOLVED that an additional policy requirement be included to ensure that the masterplan clearly demonstrates improvements to the visual appearance of the edge of the town.**

Councillor Mrs P Grove-Jones asked if an increased number of commercial/light industrial units could be included in the extended Stalham ST23/2. She asked if any marketing had taken place to establish requirements and feasibility.

The Planning Policy Manager confirmed that it was the intention to increase the number of commercial units. A study carried out now would not reflect the demand in a few years' time. There was a question as to how long sites would need to be held and how developers could be made to market the sites properly.

Councillor Mrs A Fitch-Tillett stated that the Highway Authority had objected to access onto the Yarmouth Road when considering the former abattoir site.

The Planning Policy Manager explained that the Highway Authority would not object provided there were controls over commercial use of the site. It might be necessary to consider other employment generating uses such as care homes, hotels etc.

The Planning Policy Manager read a statement from Councillor N Dixon, raising the following points (summarised):

- the need for a choice of sites for businesses and an element of healthy competition between landlords to help promote economic growth.
- The need for more mixed land allocations for housing and employment to help promote choice for businesses and encourage local work opportunities and more sustainable communities.
- More robust criteria and delivery certainty with mixed housing and employment allocations to ensure employment land remained available for a longer period.
- Infrastructure implications need to be included as part of an integrated approach to land allocations.
- The need to ensure housing allocations are made in proportions that can deliver wider benefits.

The Planning Policy Manager explained that the Planning Policy Team had tried to reflect Councillor Dixon's views.

It was requested that Councillor Dixon's comments be forwarded in full to the Working Party.

Councillor Mrs S Arnold asked if it was possible to introduce an incentive scheme for industrial and business premises.

The Planning Policy Manager stated that such a policy would be more appropriately addressed through economic development policy rather than planning policy.

Councillor D Young declared an interest at this point as there was an issue close to where he lived. He considered that the draft policy for employment development outside designated employment areas and employment allocations was weaker than the current policy, which did not allow developments which would involve loss of employment. He asked if the policy could be expanded to protect valuable local amenities. He suggested the wording be amended to include "... affect economic growth and employment opportunities or result in the loss of a valuable amenity."

The Planning Policy Manager suggested that that the policy be strengthened to include a more robust set of criteria to ensure that beneficial uses were protected.

## **RESOLVED**

- 1. That the provisional preferred employment policies and preferred sites to be included within the First Draft Local Plan for consultation be confirmed, subject to strengthening the policy to ensure the protection of beneficial uses.**
- 2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

**63. LOCAL PLAN - OPEN SPACE, LOCAL GREEN SPACE AND PUBLIC RIGHTS OF WAY AND ACCESS**

The Senior Planning Officer (MM) and Planning Policy Team Leader presented a report which considered the draft policy approach to be taken in the new Local Plan in relation to open space, Local Green Space (LGS) and Public Rights of Way and recommended the future designation of areas of open space in relation to the settlement hierarchy.

Councillor Mrs S Bütikofer queried why Holt Sure Start had been removed from the list as it was one of the Sure Start schemes to be retained.

The Planning Policy Manager explained that the Sure Start Centre was formerly allocated as open space as a large part of the area had not been developed. Since then, buildings had been erected on the site and it was considered not to meet the criteria as visibly open space and was not available for public recreational use.

Councillor Ms M Prior, local Member for Holt, stated that she did not consider that the site was green space and it was not open to the public.

The Planning Policy Manager explained that representations could be made during the consultation period. Holt Sure Start was borderline and either designation or removal could be justified.

Councillor D Young considered that few rural villages did not meet the current aspirations for open space.

The Planning Policy Manager explained that the space standards allowed improved provision under planning applications and provided evidence to identify the current deficiency. The Sports Pitch Strategy was being reviewed and would identify the deficiencies which the Council wished to address.

Councillor Mrs A Fitch-Tillett referred to Cabbell Park, Cromer and asked if the designation would remain if the sports facilities were relocated, as she did not wish to see the potential for the site lost.

The Planning Policy Manager explained that the policy allowed for the relocation of the sports pitches elsewhere in the town and would allow for the development of the existing site if relocation took place.

Councillor Ms M Prior asked how the Sports Pitch Strategy would account for the sports facilities at Gresham's School.

The Planning Policy Manager stated that the study was primarily considering publicly accessible sports pitches. He was not sure how Gresham's would be considered and would report back on this matter.

It was proposed by Councillor J Punchard, seconded by Councillor Mrs P Grove-Jones and

**RESOLVED**

- 1. That the provisional preferred open space designations and policies to be included within the First Draft Local Plan for consultation be confirmed.**

**2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

**10. LOCAL PLAN PREPARATION – RE-USE AND CONVERSION OF BUILDINGS IN THE COUNTRYSIDE**

The Planning Policy Manager presented a report which considered the draft policy approach to be taken in the new Local Plan in relation to the re-use and conversion of buildings in the Countryside to both residential and commercial uses and recommended a draft policy for public consultation.

The Planning Policy Manager stated that buildings which had already been converted to holiday use would be dealt with in a further report to the next meeting.

Councillor Mrs P Grove-Jones referred to an application which had been considered by the Development Committee for conversion of a former building where only one wall remained. She asked if the proposed policy would allow conversion of such structures.

The Planning Policy Manager confirmed that such applications would not be permitted. The policy referred to conversion and would not allow development where there was insufficient structure to convert. There was also a need to prevent the restoration of barns prior to submission of applications for conversion. He suggested that wording be added to the policy to state that recently erected and recently altered buildings would not benefit from the policy.

Councillor Mrs A Fitch-Tillett asked how the conversion of boats would be dealt with.

The Planning Policy Manager stated that he would need to reflect on this matter.

Councillor Mrs S Bütikofer supported the use of buildings such as former potato stores for commercial uses but stated that it was important to protect the amenities of local residents.

The Planning Policy Manager explained that developments would also need to comply with other policies in the Local Plan, such as highways, visual appearance and amenity. He suggested the addition of wording in the policy regarding the need to comply with these matters to provide a relationship with other policies in the plan.

Councillor Mrs S Arnold referred to the quality of the buildings to be restored. She requested that the policy be tightened to give more control over this issue.

The Planning Policy Manager advised that the previous Local Plan had required buildings to be “worthy of retention”. The new permitted development rights included the wording “capable of conversion” and this wording would need to be used in the new policy.

Councillor Mrs A Green referred to the requirement to demonstrate that a building was redundant or disused. She asked if a building was considered to be in use if it was only used to house a tractor.

The Planning Policy Manager advised that judgement would need to be applied as there were many different circumstances. He considered that the descriptions used in the policy were correct and aligned with the NPPF.

Councillor D Young referred to the preservation of services and amenities. He considered that the policy was weak in terms of preventing the closure of a valuable amenity in order to comply with the policy.

The Planning Policy Manager explained that the supporting text would assist in interpreting the policy and was likely to refer to existing or last use over a reasonable period of time. It should not create an incentive to displace a valued community facility.

Councillor Mrs P Grove-Jones asked if buildings which were subject to permitted development rights could be required to comply with the design criteria.

The Planning Policy Manager explained that buildings which did not require planning permission could not be controlled under planning policy. Buildings which needed planning permission for conversion would be required to comply with the Design Guide.

It was proposed by Councillor Mrs P Grove-Jones, seconded by Councillor R Shepherd and

#### **RESOLVED**

- 1. That the draft Rural Building Conversion policy is published for public consultation as part of the draft Local Plan.**
- 2. That the precise wording of the policy is delegated to the Planning Policy Manager.**

#### **11. FUTURE MEETING ARRANGEMENTS**

It was agreed that future meetings would start at 10.00 am and consideration should be given to avoiding a clash with Norfolk County Council's Full Council meetings so that all Members had the opportunity to attend the Working Party meetings.

The meeting closed at 11.50 am.

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CHAIRMAN

**Local Plan – Draft approach to growth in villages.**

Summary: This report considers the policies that could be included in the new Local Plan in relation to housing growth in villages. It includes a revised policy for rural exceptions developments.

Conclusions The approaches/policies identified in this report are being presented as drafts for public consultation.

- Recommendations:
- 1. That the additional villages identified in Table 1 are identified as preferred settlements for small scale growth delivered via infill development within defined development boundaries, small allocations (subject to site availability and suitability) and the continued application of a rural exceptions policy for affordable homes.**
  - 2. That the revised Rural Exceptions Policy in Appendix A is published for consultation.**

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

**1. Purpose**

1.1 To determine the draft approach to be taken to future development opportunities in villages in the district which have not previously been identified for growth in the emerging Local Plan. Once agreed the draft approach will be incorporated into the new Local Plan (Part 1) which will then be subject to public consultation.

1.2 In the event that it is agreed to allocate further development sites in villages it is proposed that the identification of potential sites is undertaken following the consultation on Part 1 of the Plan and that any sites identified will then be subject to a Part 2 consultation later in the year.

1.3 The report also suggests a new rural exceptions policy.

**2. Background.**

2.1 At previous meetings of the Working Party the key components of the development strategy for the district have been agreed for consultation. This includes a provisional housing target of around 10,500 -11,000 dwellings, a distribution of growth focussed on the larger settlements, and identification of potential sites for



allocation in all of the towns and four of the larger villages (Mundesley, Ludham, Briston and Blakeney). It has also been agreed in principle that some modest growth (up to 20 dwellings) could be permitted in a number of the more sustainable villages in the district. This report considers which villages might be considered as sustainable and what types of policies might be introduced to enable some further growth in these locations.

### **3. The NPPF 2018**

3.1 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which is defined as having three objectives: an economic objective, a social objective and an environmental objective. To help achieve this the framework *'supports strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.'*

3.2 Paragraph 78 of the NPPF relates specifically to rural areas and sets out that *'planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'*

3.3 Paragraph 103 states that in order to promote sustainable transport *'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'*. This then takes into account that sustainable transport solutions will vary between urban and rural areas and this should be taken into account in both plan-making and decision-taking.

3.4 The National Planning Practice Guidance (PPG) reiterates many of the objectives as set out in the NPPF. The overall message in the PPG in regards to the supporting sustainable rural communities is clear; *'a thriving rural community depends, in part, on retaining local services and community facilities'* and *'rural housing is essential to ensure viable use of these local facilities.'*

3.5 Taken overall some modest growth in some villages, particularly those with some services and facilities, would be consistent with the Framework.

### **4. Identifying potential locations for small scale growth.**

4.1 Whilst the NPPF is supportive of sustainable growth in rural areas it stops short of defining what 'sustainability' might mean in each area, allow for authorities to have regard to specific local circumstances rather than being constrained in their choices by a set of definitive criteria. However, it is clear from the framework that there are some core considerations to be taken into account. These include access to local services (not just in the village itself but potentially nearby), minimising travel distances particularly for larger scale developments where this involves car journeys, making best use of walking, cycling and public transport opportunities where available, protecting the character of the area including impacts on designated areas such as the AONB, access to jobs, and the availability and suitability of potential development sites. A communities need for affordable homes is an important consideration and in North Norfolk supports a permissive approach towards rural exceptions development (see below).

4.2 Given the range of factors which influence the relative sustainability of any given location and the wide range of settlement types in the District it is not considered practical to produce a rigid process which absolutely *determines* whether growth should be allowed or at what scale in different settlements. It is important to take

account of the characteristics of each settlement in making such decisions. For example, Wicken Green (Tattersett) and Badersfield are amongst the largest village communities in North Norfolk but they have very little in the way of local services and are comparatively distant from larger settlements, whilst Little Snoring, on the other hand, is very small in comparison but it has a small shop, primary school, public house and is a short journey by convenient public transport to the higher order services in Fakenham. Comparing these very different places and trying to determine in a precise analytical way what type of growth may be appropriate is a complex task.

4.3 Notwithstanding this complexity it is necessary to have an objective basis for *informing* decisions about which settlements might be suitable for growth. In this regard convenient access to day to day services is a key consideration which underpins national policies in relation to housing distribution - those places with convenient access to the broadest range of services are generally held to be the most sustainable. This has informed the suggested settlement hierarchy for the new plan which thus far has sought to focus growth only on those settlements which include a good range of day to day facilities including convenience shopping, schools and doctor's surgeries all of which are regarded as key day to day facilities. This resulted in the identification of just four villages where new development site allocations would be made (Ludham, Briston, Mundesley and Blakeney)

4.4 There are many villages in North Norfolk which have some but not all of these three essential services and a small number which although they have little in the way of services themselves are closely related to larger communities. A desk based assessment of a broader range of services has been undertaken. These services have been separated into three categories: 'key services', 'secondary services', and 'desirable services'. It is important to note that the criteria set out within each of these categories is intended to be quantitative and not qualitative i.e. does a Primary School exist, and that to some extent the distinction between a key service and a secondary or desirable service is a matter of judgement. The categories used are:

**Key Services:**

- Primary school;
- Convenience shopping<sup>1</sup>; and
- GP surgery.

**Secondary Services**

- Post Office
- Other Shopping<sup>2</sup>
- Public House/Restaurant
- Meeting Place (e.g. Village Hall)

**Desirable Services**

- Petrol Filling Station
- Vehicle Repair Shop
- Place of Worship
- Employment Land

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<sup>1</sup> Convenience Goods: Broadly defined as food, drinks, tobacco, newspapers, magazines, cleaning materials, toilet articles. Planning Portal (2018) [Online] [https://www.planningni.gov.uk/index/policy/planning\\_statements/pps05/pps05\\_glossary\\_of\\_terms.htm](https://www.planningni.gov.uk/index/policy/planning_statements/pps05/pps05_glossary_of_terms.htm) [Accessed 18/12/2018]

<sup>2</sup> 'Other Shopping' is considered to be any other retail opportunities within the village. For example, butchers, farm shops, clothing shops etc.

4.5 Using this it is possible to identify those settlements which although not having all the key services do have a reasonable selection. All those identified in the table below as potential additional locations for growth have at least a shop or a school, but not both, and four other services included in the secondary and desirable categories. Based solely on service provision these would represent the more sustainable village communities in the district.

**Table 1 List of potential villages for small scale growth**

Villages already identified for growth by Working Party		
Blakeney	Ludham	
Briston & Melton Constable	Mundesley	
Potential additional villages for small scale growth		
Aldborough	Horning	Sea Palling
Bacton	Langham	Southrepps
Binham	Little Snoring	Sutton
Bodham	Overstrand	Trunch
Catfield	Potter Heigham	Walcott
Corpusty & Saxthorpe*	Roughton	Walsingham
East Runton	Scottow (Badersfield)	West Runton
Happisburgh	Sculthorpe	
High Kelling		

\* Development boundary and growth sites already identified in Neighbourhood Plan.

## 5. Potential Policy approaches for delivering village growth

5.1 In the event that the above settlements are agreed as locations where further modest growth will be suggested it is necessary to determine the policy approach(s) to enable this. A number of options could be considered.

**Option 1.** Adopting a criteria based policy which allows for infill developments within each of the named settlements but with each settlement *not* having a defined development boundary. Such a policy would need to be carefully drafted and would need to define the meaning of 'infill'. This option is not favoured by officers as it would leave the determination as to what represented appropriate infill to individual planning applications.

**Option 2.** Allowing development to take place within development boundaries shown on a Proposals Map. This would involve defining boundaries for each of the selected settlements These could be drawn in a number of ways, for example, tightly around existing built up areas or more loosely in order to allow for greater quantities of development.

**Option 3.** Allocating specific sites for development. This would involve selected one or more sites in each settlement for development and making a formal allocation in the plan for a specific quantity of development. The quantity could vary from one settlement to another having regard to settlement characteristics and site suitability.

**Option 4.** Allowing rural exceptions developments. This does not involve the specific identification of sites but would rely instead on a policy which would allow such schemes in defined locations eg well related to built-up areas. This would be a continuation of the existing rural exceptions policy.

5.2 It is recommended that each of the selected villages should be defined by a development boundary, that residential developments should be permitted within the

defined boundaries, and that subject to suitable sites being identified each village should have a small allocation of between 10 and 20 dwellings.

## **6. Rural Exceptions Policy**

6.1 Existing Core Strategy policy allows for the provision of affordable homes in the Countryside as an exception to policies which normally restrict residential development in such locations. It allows for small groups of exclusively affordable homes to be built in locations which are adjacent to groups of existing houses or well related to one of the selected settlements. The policy has proved to be critically important in delivering affordable homes and for the first five years of the Core Strategy plan period was responsible for providing the lion's share of affordable dwellings in the district. Whilst allocated development sites have more recently provided a contribution towards addressing local needs it remains the case that rural exceptions sites are a critical component of the Council's strategy to provide affordable homes.

6.2 The evidence (SHMA) indicates that over the next plan period some 2,000 additional affordable dwellings will be required (around 20% of total growth). To have any realistic prospect of addressing this requirement a permissive approach towards rural exceptions development will be essential.

6.3 In recent years the Council has been prepared to include some market housing within rural exception schemes. This has been permitted as a mechanism to increase the financial value of the finished development with this additional value being used to subsidise the delivery of further affordable dwellings. Arguably this has also had the benefit of delivering a wider mix of housing tenures within schemes thus assisting with the delivery of mixed, inclusive communities. This recent change is reflected in the revised policy in Appendix A.

6.4 Currently adopted policy also requires that rural exception schemes are limited to just 10 dwellings. In practice most of the schemes approved have exceeded this size with the scale of development being determined by consideration of the level of local need and the suitability of the particular site for the proposed development. Whilst it is considered important that rural exception schemes should remain relatively small it is felt that the inclusion of a specific site size threshold within the policy is unhelpful and somewhat arbitrary. The revised policy suggests replacing the numeric site size limitation with a criteria based assessment based on need and site suitability including reference to the size and character of the 'host' community.

## **7. Recommendations**

- 1. That the additional villages identified in Table 1 are identified as preferred settlements for small scale growth delivered via infill development within defined development boundaries, small allocations (subject to site availability and suitability) and the continued application of a rural exceptions policy for affordable homes.**
- 2. That the revised Rural Exceptions Policy in Appendix A is published for consultation.**

## **8. Legal Implications and Risks**

8.1 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.

## **9. Financial Implications and Risks**

9.1 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 Coastal Policies – Draft policies for consultation**

Summary: This report considers the policies that could be included in the new Local Plan in relation to the Coast. It suggests three separate policies covering:

- *Undeveloped Coast Policy* – keeping a defined undeveloped coast area free of unnecessary development.
- *Coastal Erosion Policy*– minimising development within coastal erosion risk areas.
- *Coastal Adaptation Policy*– Allowing for replacement developments which are at risk from coastal erosion to an alternative location (roll back policy).

Conclusions The policies identified in this report are being presented as drafts for public consultation.

Recommendations: **Members consider the contents of this report and confirm the provisional preferred policy approach’s to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

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

**1. Introduction**

1.1 This report addresses how the local plan might include policies specifically related to the coast and coastal erosion in North Norfolk. It includes three draft policies relating to:

- *Undeveloped Coast Policy* – keeping the defined Undeveloped Coast free of unnecessary development.
- *Coastal Erosion Policy*– minimising development within coastal erosion risk areas.
- *Coastal Adaptation Policy*– Allowing for replacement developments which are at risk from coastal erosion (roll back).

These policies will compliment and support the wider approach to development in the coastal area including tourism management, the countryside and Area of Outstanding Natural Beauty policies included elsewhere in the Plan. Similar policies are already included in the adopted Core Strategy. Consultation drafts of all three policies are included in Appendix A – Policy Pack.

1.2 A Topic Paper is being prepared which sets out the background to the issue of coastal change, including the national policy background and developments since the adoption of the Core Strategy in 2008. The paper includes a review of policy options and recommends the revised policy approaches outlined in this report. It will be published alongside the draft plan to support the consultation.

## **2. Statement of Common Ground**

2.1 A Statement of Common Ground has also been prepared between all of the coastal planning authorities in Norfolk and Suffolk and this was adopted by all of the Authorities during 2018. The key aims of the statement are:

- A holistic and “whole coast” approach should be taken and coastal change is part of a dynamic coast. A naturally functioning coastline is desirable (where feasible).
- Local Authorities will work together to align policy approaches (where possible).
- Policies should promote the well-being of communities affected by coastal change and minimise the potential effects of blight.
- Protect the coastal environment including nature conservation designations and biodiversity.
- To work with local businesses and the wider economy to maximise productive use of properties and facilities for as long as they can be safely utilised to promote investment, viability and vitality of the area
- Adopt a balanced precautionary approach towards new development in Coastal Change Management Areas in order not to increase risk, while at the same time to enable communities to adapt to coastal change.
- To promote innovative approaches and building techniques that enable coastal adaptation, removal or structures and property, roll-back or relocation.

2.2 These agreed overall aims are reflected in the recommended draft policies.

## **3. The Undeveloped Coast Policy.**

3.1 The ‘Undeveloped Coast’ is a defined area shown on the adopted Proposals Map. It is not a national or statutory designation but derives from the 1998 North Norfolk Local Plan which recognised the unique nature of the coastal area and that it should be protected. To achieve this current policy EN3 states that developments not requiring a coastal location should be restricted in this area whilst continuing to allow for community, commercial, business and residential developments which are important to the well-being of communities. In this way the policy does not operate as a total ban on development but allows for forms of development that help to support sustainable communities whilst protecting the wider coastal area from inappropriate forms of development.

3.2 The designated area extends along the entire coastal frontage of North Norfolk from Holkham to Horsey but excludes the major settlements which lie within this area

and in part overlaps with the Heritage Coast and the Area of Outstanding Natural Beauty which are both national designations. Whilst there are a number of other policies which protect the coast including the AONB designation, tourism policies and specific protections offered to individual areas/sites it remains important to recognise that the intrinsic character of the coast as a whole, its relative remoteness and lack of development should be protected. It is considered that there is no need to make substantive changes to the existing policy (EN3) and only minor word changes are recommended (see draft policy in pack).

#### **4. Coastal Erosion Policy.**

4.1 The issue of coastal erosion is a very significant one for the district and existing Core Strategy Policy EN11 has generally operated to restrict inappropriate development in the area at risk. This area, known in the Core Strategy as the Coastal Erosion Constraint Area and in the National Planning Policy Framework as Coastal Change Management Area (CCMA), derives from the Shoreline Management Plan (SMP) and represents an area where there is an assessed potential risk of coastal erosion over 20, 50 and 100 year time periods. Shoreline Management Plans remain the best available data about the receding coastline and officers recommend that this remains the basis for the designation and policy development.

4.2 The proposed new policy continues to restrict development in the CCMA but unlike the current policy does allow temporary permissions subject to a legal agreement to ensure that the site is cleared at the end of its life. In order to ensure that applications for development in this risk area have adequately considered the risks from coastal change, the policy could usefully benefit from a requirement to submit a Coastal Erosion Vulnerability Assessment as part of any application within the CCMA. This approach is currently taken in Waveney district and is recommended to be included in the revised policy. The requirement is not onerous but does require the applicant to consider the forecasts in the Shoreline Management Plan and should encourage the applicant to consider any mitigation which might be required in the light of that information.

4.3 The revised policy also covers essential infrastructure and coastal management schemes as acceptable forms of development within risk areas as this is not specifically covered in the Core Strategy policy. (Draft policy attached)

#### **5. Coastal Adaptation (Roll Back) Policy**

5.1 Current Policy EN12 Relocation and Replacement of Development affected by Coastal Erosion provides a mechanism to relocate (roll back) those properties at risk from coastal erosion (within 20 years for residential and 50 years for commercial and community development). It allows for residential development of relocated properties in or adjacent to selected settlements across North Norfolk and effectively operates in a similar way to the rural exceptions policy by providing a supportive policy context for roll back proposals in locations where other types of development would not normally expect to secure planning permission. Although this policy has been utilised as part of the Pathfinder Projects, where public funding has supported demolition and relocation of dwellings at Happisburgh, for example, it has not been widely taken up. This is not necessarily because the policy is flawed, but may be a result of the limited number of properties at imminent risk or perhaps because the financial viability of removal of existing buildings/dwellings together with the costs of land purchase and construction of replacements may not be affordable to those owners of at risk properties.



5.2 As a measure to try and help address the issue of potential lack of viability the revised policy suggests removing a current requirement that any replacement dwelling is only as large as the home to be replaced. Such an approach may be criticised as it could operate in a way which could be seen to directly and financially benefit those living in 'at risk' properties. However, there are wider economic and social benefits in encouraging investment and thereby increasing confidence in the settlements impacted by coastal erosion and any benefit for individuals needs to be considered in this wider context.

5.3 To ensure that these wider benefits are captured locally the revised policy seeks to more closely relate the relocation site to the affected community and proposes a preference for a site well related to the affected community, subject to a number of criteria. If such a site is not available, other sites adjacent to selected communities will be considered (current policy allows for relocation to any of the selected settlements in the district).

5.4 The revised policy also proposes aligning the 'at risk' period for both residential and commercial and community uses to 20 years for all uses, rather than the 50 years for commercial/community uses in current policy.

## **6. Conclusions**

6.1 Protection of the coast and the issue of coastal erosion are key concerns for the local plan to address. The approaches set out in this report represent officer's views of the right balance between the precautionary approach to limiting risk from coastal erosion whilst supporting the economic and social vitality and viability of coastal communities.

6.2. The options identified in this report are being recommended for consultation purposes only and are subject to on-going review. Subject to Member endorsement officers will prepare the Consultation Draft Plan, details of Alternative Options Considered, and supporting Sustainability Appraisal documents.

## **7. Recommendations**

- **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
- **The final policy wording and content of the consultation document is delegated to the Planning Policy Manager and Coastal Manager.**

## **8. Legal Implications and Risks**

8.1 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.

## **9. Financial Implications and Risks**

9.1 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. Significant costs are required for coastal management schemes and grant funding is required to implement them.

Inappropriate planning policies to support coastal communities to adapt to coastal change could incur financial and reputational risks.

### **Abbreviations**

**SMP** - Shoreline Management Plan

**CCMM** – Coastal Change Management Area (this is the NPPF terminology for areas in the North Norfolk Core Strategy called Coastal Erosion Constraint Area)

**NPPF** – National Planning Policy Framework

**AONB** – Area of Outstanding Natural Beauty

**NORTH NORFOLK DESIGN GUIDE - SUPPLEMENTARY PLANNING DOCUMENT FOR INCLUSION ALONGSIDE THE EMERGING FIRST DRAFT LOCAL PLAN (CONSULTATION VERSION)**

Summary: This report seeks approval for the draft North Norfolk Design Guide (SPD) to be included alongside the First Draft Plan (Reg.18) which will be subject to public consultation next year. The report provides further information on the design guide and gives Members the opportunity to view the guide in its draft format. This report also seeks approval for the draft design policies to be included within the emerging Local Plan.

- Recommendations:
- 1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
  - 2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**
  - 3. That the guide be subject to a minimum six-week public consultation period alongside the emerging Local Plan**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Paul Rhymes, Conservation and Design Officer, 01263 516367, <a href="mailto:paul.rhymes@north-norfolk.gov.uk">paul.rhymes@north-norfolk.gov.uk</a> James Mann, Senior Planning Policy Officer, 01263 516404, <a href="mailto:james.mann@north-norfolk.gov.uk">james.mann@north-norfolk.gov.uk</a>	

**1. Introduction**

- 1.1 This report presents an update on the review of the North Norfolk Design Guide setting out the next stages in the documents production and sets out the design policies within the emerging Local Plan. The Working Party was updated on the document’s creation and its overarching aims and objectives at the 21 May 2018 meeting.
- 1.2 Since this meeting, the draft design guide has emerged as a working draft and is programmed for public consultation in the new year. At the same time the emerging local plan has been progressing towards Regulation 18 consultation. Two overarching design policies have been drafted in order to provide the hooks to the Design Guide in order to

give this more weight through the decision making process. These have been produced in accordance with the overarching principles enshrined within the National Planning Policy Framework (NPPF).

## 2. National Policy Context

- 2.1 The value of good design is well recognised in national policy. Chapter 12 of the NPPF sets out the approach to 'Achieving well-designed places'. Some of the key themes from Chapter 12 are as follows:
- Good design is a key aspect of sustainable development that creates better places in which to live and work and helps development acceptable to communities;
  - Plan policies should set out a clear design vision and expectations to ensure that applicants have as much certainty as possible about what is likely to be acceptable;
  - Design policies should be developed with local communities so they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics.
- 2.2 Paragraph 130 of the NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents".

## 3. Design Policies within the Local Plan

- 3.1 The emerging Local Plan contains two policies in regards to overarching design policies: High Quality Design and Protection of Amenity. The overarching purpose of the design policies is to ensure consistency with the National Planning Policy Framework and to give weight to the guidance set out within the North Norfolk Design Guide. The full text of the policies can be found in the appendix to the working party report.

### Design Policy 1: High Quality Design

- 3.2 'High Quality Design' seeks to set out the overarching design principles to which all development within the District will need to comply with. The policy provides the hooks for the guidance within the design guide to be given weight in the decision making process. Some of the key aspects of the policy are as follows:
- **Comply with the North Norfolk Design Guide or justify a departure from the guidance.** The current policy simply states 'have regard to the North Norfolk Design Guide'. In line with the importance of design in the national policy agenda it is considered appropriate to strengthen the wording of this to ensure that any departure from the guidance must be justified.
  - **Headings** that mirror sections within the North Norfolk Design Guide to provide a simple, easy to follow, hook between the wording of the policy and the guidance.
  - **Further links to other policies within the plan.** As with any application all the policies within the plan must be read as a whole. However, it is important with design to note that specific policies will provide further detail and must also be complied with.

- **Increased reference to adaptability and energy efficiency.** In order to reflect the ageing population of the district and the global issue of climate change, greater importance of these issues must be given at the design stage.

### **Design Policy 2: Protection of Amenity**

3.3 'Protection of Amenity' seeks to maintain, protect and promote the amenity of the District's communities in order to ensure that all new development and existing residents benefit from a good standard of amenity. The policy is considered to provide further hooks for the guidance within the design guide to be given weight in the decision making process. There are eight criteria within the policy focusing on the following:

- Provision and protection of useable and secluded private amenity space
- Overlooking
- Overbearing
- Overshadowing and the loss of sunlight
- Forms of nuisance and pollution (noise, air, light etc.)

## **4. Background to the North Norfolk Design Guide**

4.1 The North Norfolk Design Guide was one of the first local authority guides to be produced in the country, with its first edition dating back to 1974. Over the last 44 years, the guide has seen various reviews and reincarnations which adapt to changing trends, policy and best practice. This latest version is no exception and incorporates some emerging trends particularly regarding major developments, contemporary design, health and wellbeing and green infrastructure.

4.2 The design guide plays a key role in straddling the divide between national policy and regional context and continues to be successful in helping to shape development which responds to North Norfolk's unique environment.

4.3 The overarching aim of the guide is to offer advice and support to anyone involved or interested in the design or alteration of the built environment in North Norfolk. This primary objective of raising the quality of design remains as relevant as ever and feeds into the Corporate Plan objective 'A Better Place to Be' (Environment), conservation and landscape.

4.4 The guide renews this collective commitment to best practice from all stakeholders. Whether you're a homeowner, developer, housebuilder or built environment professional; the guide challenges the way we consider high quality design and its many benefits.

## **5. What's Changed?**

5.1 The existing guide was published in 2008 and since this time there has been significant changes in national policy and guidance through the release and subsequent revision of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG). It is therefore vital that the guide reacts to these changes in policy and continues to shape development in a way which complies with national and local policy objectives.

- 5.2 The Council continues to balance significant development pressure through the Local Plan process including the allocation of larger sites for residential development and mixed use development. The design guide needs to react to this growth by offering more guidance in relation to placemaking and residential design standards. This ties in closely with the Corporate Plan objective 'A Better Place to Live' (Housing) and 'A Better Place for (Economic Development).
- 5.3 The Local Plan also includes new Development Management policies on Design, Sustainable Development, Amenity, Technical Standards amongst others which need to be backed by guidance and practical means of implementation. The design guide performs this role of supporting Local Plan policies and will be closely linked to the policy objectives within the new plan.
- 5.4 The design guide review offers the opportunity to provide this important guidance through new forms of media; but more importantly to ensure guidance is more accessible and inclusive. The new web platform gives users the opportunity to search for specific information and chances to create a more interactive and engaging experience through presentation.

**6. What happens next?**

6.1 Following the consultation exercise, the Council will consider all representations and where necessary amend the document in line with the comments made. A statement will be published, setting out a summary of the main issues raised in the consultation and how these issues have been addressed in the SPD. It is anticipated that the guide will be approved and adopted as an SPD next year. In the meantime, the consultation document will form part of the evidence base to inform policies and proposals in the emerging local plan and when dealing with planning applications.

**6.2 Timetable**

Milestone	Date
Creation of Draft DG	Sep 2018
Internal Consultation	Dec 2018
External Consultation	Jan - Feb 2019
Review and Amend	May - Jul 2019
Final Adoption	Aug 2019

**7. Recommendations:**

1. **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
2. **The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**
3. **That the guide be subject to a minimum six-week public consultation period alongside the emerging Local Plan**

## **8. Legal Implications and Risks**

- 8.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence. The Design Guide ensure these polcies are underpinned by evidence and practical means of implementation.

## **9. Financial Implications and Risks**

- 7.1 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.

Attached

Policy options – Appendix pack

**Approach to Town Centres and Retail**

Summary: This report considers the draft policy approach to be taken in the new Local Plan in relation to Town Centres and Retail

Recommendations: **1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**

**2.The final policy wording and content of the consultation document is delegated to the Planning Policy Manager,**

Cabinet Member(s)	Ward(s) affected
All Members	All
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 During 2017 the Council prepared a new Retail Study. This considered all aspects of retail policy and considered the likely demand for new retail developments in the District until 2026 having regard to the proposed levels of housing growth and likely available retail expenditure. Members considered the key findings of this Study at the meeting in April 2017. It provides an up to date evidence base for the preparation of the draft policies recommended in this report. Key findings covered:

- Current national retail trends;
- Retail Hierarchy;
- Retail capacity assessment;
- Town centre reviews;
- Policy recommendations.

1.2 The new Local Plan will include a number of policies relating to retail and town centre uses. Such polices are intended to promote town centres and aid the vitality and viability of our towns. Any policy requirements should be in line with the national policy approach detailed in the National Planning Policy Framework and the associated Planning Practice Guidance, should be based on local evidence, and should be deliverable (viable) during the plan period.

1.3 This report seeks to establish draft policy approaches (Appendix pack) which can be included in the forthcoming draft plan consultation. Four separate policies are recommended dealing with:



- Retail and Town Centre development – including the identification of town centre boundaries and primary shopping areas;
- The establishment of a retail hierarchy and the setting of any locally derived impact thresholds;
- Provision and retention of local facilities;
- Advertisements and shopfronts.

## Background Context

- 1.4 The focus of national policy remains firmly towards maintaining town centres as the location where defined town centre uses<sup>1</sup> should be directed, with a defined Primary Shopping Area being the area where retail development is concentrated. This Primary Shopping Area is used as the determining factor in order to establish centre, edge of centre, and out of centre locations in relation to retail policies which give priority to central locations for new town centre developments (the sequential approach). The national requirement to apply the sequential test discourages out of centre development if there are suitable and available sites at the edge of a centre or in a town centre itself. Applicants and the Council should show flexibility on issues such as format and scale, so that opportunities to utilise town centre, or edge of centre sites are fully considered before contemplating out of centre locations.
- 1.5 In order to support the role of town centres and promote town centre vitality and viability and ensure suitable town centre use can be located within the town centre's first, it is necessary for policy to take a positive approach to their growth, management and adaptation and:
- Define a network & hierarchy of town centres and the relationship between them in order to promote long term vitality and govern decisions on the scale of development that would be appropriate to each town centre;
  - Define the extent of the town centres and primary shopping areas, making clear the range of uses permitted in such locations;
  - Look at least ten years ahead in seeking to meet anticipated needs for retail, leisure, office and other main town centre uses;
  - Apply the sequential test to proposals that are for main town centre uses as defined in the NPPF and not in an existing centre;
  - Set out any locally derived and proportionate thresholds and requirements for assessment of the impacts on the town centre in association with development proposals outside town centres.
- 1.6 High streets and town centres face considerable challenges, not least with the growth in online retail, the continued squeeze on disposable incomes, the challenging business environment and as they adapt to changes in consumer habits and legislative practices, shop closures by national service providers. Locally the draw exerted by regional centres of Norwich and Kings Lynn put additional pressure on the market towns of North Norfolk. In response and in order to help high streets adapt to changes in how people shop and use their market towns, town centres are encouraged to diversify.

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<sup>1</sup> Retail uses including shops, restaurants, take-aways, professional services such as banks and estate agents and commercial leisure uses such as theatres and cinema's.

- 1.7 In recent years the government has “simplified” the planning process and introduced changes to national planning legislation which has seen the introduction of new permitted development rights for a range of town centre uses. These rights allow for greater flexibility in the change of use from one town centre use to another without the requirement to obtain planning permission and bring a marked change to the way town centres can be managed through planning policy
- 1.8 The 2018 NPPF also places greater emphasis on the role that residential development can play in ensuring the vitality of centres and planning policies should encourage residential development on appropriate sites in town centres.
- 1.9 Collectively these measures have the potential to bring a greater variety of town centre uses ensuring the longer term vitality of town centres, they also however have the potential to limit the ability of local authorities and of local communities, through neighbourhood planning, to plan for town centres. Across the District’s market towns these changes may result in the erosion of the traditional retail concentration found in many of the identified primary shopping areas. On the other hand, it may lead to increased variety and reinforce the role of the market towns as service centre.
- 1.10 The District has a well-established shopping hierarchy with large town centres in Cromer, Fakenham and North Walsham providing for a significant proportion of shopping and these are expected to continue to be the main focus for retail and leisure development as they offer the best prospects for attracting investment and multiple operators. These towns are geographically spread across the District, are the main centres of population, have better quality public transport, the critical mass to encourage joint shopping trips, and opportunities for development. They are therefore well placed to meet the shopping and service needs of a significant proportion of North Norfolk’s population and visitors to the area and should be the focus of any large scale new development.
- 1.11 Smaller town centres should complement the larger town centres, by providing for convenience food shopping and lower order day to day comparison shopping facilities and other services. The local/village centres should cater for top-up and local day to day needs. The smaller town centres of Holt, Sheringham, Hoveton, Stalham and Wells-next-the Sea in the District serve smaller catchments and to varying degrees have developed a particular niche market role, are dependent upon the seasonal influx of tourists, and retain their locally distinctive small shop character. Disproportionately large scale development in these smaller towns may have an adverse impact on their character and thus diminish their attractiveness as tourist destinations. Furthermore, such developments may encourage unnecessary car journeys from the larger towns. Consequently, it is considered that developments here should be smaller in scale and should be designed to meet identified needs in the town and its immediate surroundings. Functionally, the central location of Holt, Sheringham and Cromer in the District means that they often complement each other. The 2017 Retail and Town centre study demonstrates that the primary catchment areas of these towns overlap with residents utilising the retail opportunities for both comparison and convenience in all three centres. Any out of centre proposals should therefore look at impacts on all three centres.

## 2. Addressing the Requirements

- 2.1 The emerging Local Plan seeks to ensure that new retail proposals are located in sustainable and suitable locations and meet identified evidenced retail needs for the District. Primarily, the Council will seek to ensure that retail development is located within central, accessible locations within the District which can be accessed sustainably and with regard to the retail hierarchy and functional relationships between places. Only where it has been demonstrated that this cannot be achieved, or is not appropriate, should alternative locations be considered.
- 2.2 The 2017 Town Centre and Retail study identified that much of the projected growth could be accommodated through the uptake of vacant units and through the development/redevelopment of existing town centre sites. A review of the town centre boundaries and primary shopping areas has also been undertaken, informed by the 2017 Retail and Town Centre Uses Study
- 2.3 The default NPPF impact threshold of 2,500sqm is considered to be disproportionate in relation to the existing scale of all town centres within North Norfolk, and development of this scale would exceed or represent a significant proportion of the overall floorspace projection for each town over the plan period. The impact of smaller development needs to be considered. Given this and the fragility of some of the town centres smaller thresholds are proposed in line with the supporting evidence in the Retail study. Any impact assessment also needs to review the impacts on the functional links between centres and not just on the town centre closest to the proposal
- 2.4 In line with the aims and objectives **the purpose of** the Town centre and Retail policy approach is to maintain and enhance the vitality, viability and sustainability of the District's town centres. The policy seeks to enhance local provision within centres and encourage local sustainable shopping patterns by addressing high levels of leakage to outside areas and encouraging investment into appropriate higher order towns.
- 2.5 Development of additional retail floorspace outside of the town centres will normally be resisted, particularly where vacancy rates are high and sequential opportunities exist. The role of Local Service Centres will be maintained, by responding positively to appropriate small scale growth opportunities through conversion and extension, and through environmental improvements and seeking to restrict the loss of services, whilst also supporting development to preserve and enhance the settlement's vitality and viability, invest in qualitative and public realm improvements. The diversification and broadening of the economic base is supported. The approach recognises the importance of village shops to rural communities and seeks to take that into account when assessing development proposals that would result in their loss. The policy also seeks to respond positively to proposals for the conversion or extension of shops that are designed to improve their viability.

## 3 Provision and retention of Local facilities

- 3.1 The importance of maintaining and enhancing village service and facilities in rural communities should be recognised. It is also important to protect existing facilities, because in a large rural area, such as North Norfolk, the loss of the last remaining convenience store, public house or important facility in a village, or even a small town, can have a significant impact upon the ability of

local residents to access services. As well as increasing the need to travel, the loss of services can threaten the viability and vitality of rural communities.

- 3.2 The proposed policy approach updates core strategy Policy CT 3. The purpose of the policy is to allow for new community facilities and services in sustainable locations and to prevent the premature loss of important local facilities where their continued use is considered to remain a viable prospect.

#### **4 Advertisements and Shopfront**

A new policy is proposed the purpose of this is to seek to avoid the proliferation of advertisements in sensitive locations, such as in historic and rural locations or locations which have high visual amenity, where it is considered that the amenity of the locality will be impaired and to ensure new and replacement shopfronts are well designed to reflect the character of the surrounding area and enhance the visual amenity of the local area.

#### **5 Town Centre Boundaries**

- 5.1 The defined town centres are the areas which are predominantly occupied by main town centre uses as defined in the NPPF and include the primary shopping area where retail development is concentrated, (Use Classes A1-A5). National policy requires that the Council apply the sequential test to planning applications seeking to deliver retail and main town centre uses. Proposals should seek to deliver development located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. The application of the sequential approach to main town centre development indicates that Class A1 to A5 uses should be focused within the primary shopping area. Other town centre uses such as commercial leisure and office uses should be focused within the wider town centre boundary.
- 5.2 The boundaries are shown for each town in the attached appendix pack
- 5.3 The full policy wording can be seen in the attached policies appendix pack

#### **6 Recommendation**

**1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**

**2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

#### **7 Legal Implications and Risks**

The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence.

## **8 Financial Implications and Risks**

Failure to undertake plan preparation in accordance with national guidance and 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.

Attached

Policy options – Appendix pack

**Local Plan - Tourism**

Summary: This report considers the draft policy approaches to be taken in the new Local Plan in relation to tourism. It recommends draft policies for public consultation.

- Recommendations:
- **Members consider the contents of this report and confirm the provisional preferred policy approaches in the Appendix to be included within the First Draft Local Plan for consultation.**
  - **That the final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:  Martha Moore, Senior Planning Policy Officer, 01263 516084, <a href="mailto:martha.moore@north-norfolk.gov.uk">martha.moore@north-norfolk.gov.uk</a>	

**1 Introduction**

The new Local Plan will include a number of policies relating to tourism. The tourism policies will be contained within the wider Economic section of the new Local Plan and will seek to ensure that the District is developed as a destination for tourists, whilst recognising the need to sustain and conserve the environment and local communities. Since the adoption of the Core Strategy, the National Planning Policy Framework (NPPF) was published in 2012 and revised in 2018. In line with changes to national policy, there is a need to update the approach to tourism within the emerging Local Plan.

1.1 This report seeks to establish draft policy approaches (Appendix A) which could be included in the forthcoming draft plan consultation. Four separate policies are proposed, covering:

- New-Build Tourism Accommodation, Static Caravans and Holiday Lodges
- Use of Land for Touring Caravan and Camping Sites
- New Build Tourist Attractions
- Retaining an adequate supply and mix of tourist accommodation

It is intended that the policies are read and applied in conjunction with the Local Plan as a whole.

## 2 Background

- 2.1 The current Core Strategy (2008) includes four key policies to cover tourism. These are:
- **EC7 (The Location of New Tourism Development)** - outlines where new tourist accommodation and attractions should be located. The policy applies a sequential approach and splits the District into four tourism Asset Zones, depicted on a map, in order to direct tourism development to appropriate locations.
  - **EC8 (Retaining an Adequate Supply and Mix of Tourist Accommodation)** - outlines the circumstances in which the loss of tourist accommodation would be permitted.
  - **EC9 (Holiday and Seasonal Occupancy Conditions)** - outlines planning conditions to be imposed on approvals for new unserviced holiday accommodation to ensure that it remains as tourist accommodation and does not become part of the housing stock.
  - **EC10 (Static and Touring Caravan and Camping sites)** - outlines circumstances in which such accommodation would be acceptable in principle.

## 3 Tourism Overview

- 3.1 In paragraphs 80-84, the NPPF requires planning policies to help create the conditions in which businesses can invest, expand and adapt and requires that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Further, the NPPF outlines the importance of supporting a prosperous rural economy, enabling the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings. The NPPF is generally supportive of tourism and states that local plans should support sustainable rural tourism which benefits the rural economy whilst respecting the character of the countryside (para. 83).
- 3.2 Tourism is vital to North Norfolk's economy; in 2017, 8,827,700 trips were made to North Norfolk (day and staying), accounting for a total tourism value of £505,109,250. Further, tourism accounts for 28.4% of all employment (Destination Research, n.d. p. 2)<sup>1</sup>.
- 3.3 The Business Growth and Investment Opportunities Study recognises that tourism will continue to be an important component of the District's economy. It states that whilst the local tourism industry is mature and successful, there is potential for the District to capitalise further from some of its existing attractions and tourism strengths, including continuing to promote diversification, improved marketing and further accommodation options to include capacity (BE Group, 2015, p. 87<sup>2</sup>). The North Norfolk Economic Growth Strategy and Action Plan strives for North Norfolk to be known as one of the best locations to visit and experience the destination for all it has to offer (NNDC, pp. 6).
- 3.4 The tourism economy of North Norfolk is heavily dependent on the quality of the natural environment; the District provides an extremely diverse tourism offer, primarily due to its varying landscape comprising an attractive coastline, much of which is within an Area of Outstanding Natural Beauty (AONB), extensive countryside, coastal birdlife, seaside resorts, historic towns and villages and the Norfolk Broads. The NPPF states

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<sup>1</sup> Economic Impact of Tourism North Norfolk – 2017.

<sup>2</sup> Business Growth and Investment Opportunities Study North Norfolk District Council, Draft Report V4.

that great weight should be given to conserving and enhancing landscape and scenic beauty in the Broads and Areas of Outstanding Natural Beauty, which have the highest protection in relation to these issues (para. 172) and that plans should safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity (para. 174). Further, the East Inshore and East Offshore Marine Plans (2014) recognise the importance of tourism in coast areas and seek to support tourism and minimise harm resulting from development on tourism.

- 3.5 Supporting the District's tourist industry is therefore recognised as being of great importance, but it must not be at the expense of the assets and attractions that draw people into the area. It is recognised that within North Norfolk visitor pressures can give rise to concerns in environmentally sensitive locations such as the Norfolk Coast AONB, the coastal Natura 2000 sites, North Norfolk Heritage Coast and The Broads, and related strategies<sup>3</sup> and studies<sup>4</sup> confirm that policy needs to recognise the more restricted capacity of these areas.

#### **4. Suggested Policy Approach**

- 4.1 In brief, the new policies do not propose the retention of the existing Tourism Asset Zones. Instead, the new approach is based on directing new tourism development towards or away from specific designated areas applies (such as the AONB, Heritage Coast, Undeveloped Coast, Environment Agency Flood Risk Zone 3, Coastal Change Management Areas and Large and Small Town Centres),

In line with the NPPF, it is considered that the new draft policies covering tourism should address the following aspects.

#### **4.2 New-Build Tourism Accommodation, Static Caravans and Holiday Lodges**

The NPPF requires planning policies to enable sustainable rural tourism which respects the character of the countryside and to enable the sustainable growth and expansion of all types of businesses in rural areas, through both the conversion of existing buildings and well-designed new buildings (para. 83). In addition, the NPPF also requires Main Town Centre Uses (which includes hotels) to, in the first instance, be located in town centres (Policy 86). It is recognised that the tourism economy of North Norfolk is heavily dependent on the quality of the natural environment and priority should therefore be given to support tourist accommodation whilst also minimising harm resulting from development.

- 4.3 The new draft policy therefore aims to direct new tourist accommodation, static caravans and holiday lodges within the boundaries of existing settlements, whilst also allowing for the expansion of existing businesses. The policy allows for new static caravan sites or holiday lodge accommodation where it would relocate existing sites on the clifftop or within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3. In addition, the supporting text of the Policy would require the imposition of conditions (where appropriate) to ensure that the development was retained as tourist accommodation.

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<sup>3</sup> *The primary aim of the Sustainable Tourism in the Broads 2016 – 2020 is 'To develop, manage and promote the Broads as a high quality sustainable tourism destination, in keeping with its status as an internationally renowned environment' (The Tourism Company, 2016, p. 18).*

<sup>4</sup> *The AONB Tourism Impact Analysis found that tourism in the AONB should be controlled and managed to mitigate negative impacts.*



#### 4.4 Use of Land for Touring Caravan and Camping Sites

- 4.5 As discussed above, sustainable rural tourism which respects the character of the countryside is an important part of a prosperous rural economy (para. 83).

In addition, Areas of Outstanding Natural Beauty (AONB) and National Parks are national landscape designations afforded the highest status of protection for their landscape and scenic quality. The Norfolk Coast AONB and The Broads National Park are valuable assets for North Norfolk in terms of sustainable tourism. The NPPF requires local plans to give great weight to conserving and enhancing landscape and scenic beauty in these areas and for the conservation and enhancement of their wildlife and cultural heritage. Further, the NPPF requires policies to protect and enhance valued landscapes (paragraphs 170-173). Given the importance of the natural environment for the District's tourism, priority should be given to ensuring that development proposals are directed away from sensitive sites.

- 4.6 It is recognised, however, that use of land for touring caravan and camping sites has a lower impact than new-build accommodation as they are not permanently occupied and in winter months there may be little evidence of activity. However in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled.

- 4.7 As far as the use of land for touring caravan and camping sites is concerned, therefore, the new draft policy approach taken will very much reflect the degree of protection of the area of land on which the proposal is being made, with landscape character and visual impact, as well as the effects on infrastructure and communities being key considerations. In addition, the supporting text of the Policy would require the imposition of conditions (where appropriate) to ensure that the development was retained as tourist accommodation and to outline the imposition of a seasonal occupancy condition when proposed accommodation is not suitable for year-round occupation by nature of its location, design or proximity to a habitat that needs extra protection at certain times of the year.

#### 4.8 New Build Tourist Attractions

- 4.9 The NPPF requires planning policies to recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It requires development to be sensitive to its surroundings, not to have an unacceptable impact on local roads and to exploit opportunities to make a location more sustainable. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist (para. 84).

- 4.10 The new draft policy therefore aims to direct new tourist attractions to within the boundaries of existing settlements, whilst also allowing for the expansion of existing businesses. It is recognised, however, that there may be instances where development in the Countryside policy area could be acceptable, providing that it has been demonstrated that there is no suitable buildings for re-use and subject to there not being any unacceptable impact on the landscape, highways, amenity and light etc.

#### 4.11 Retaining an adequate supply and mix of tourist accommodation

- 4.12 Across North Norfolk, there is a broad range of tourist accommodation available including (but not limited to) caravan sites, camp sites and glamping sites, self-catering

accommodation, hotels and guest houses for all year round and seasonal uses. These sites provide a range of permanent and temporary buildings as well as differing in size and location. Collectively they create a diverse choice of places for tourists to stay. The provision of a diverse range of tourist accommodation is desirable and tourists visiting the area can have positive impact on the economy. A mix and sufficient level of accommodation is required to provide a choice for a range of visitors to North Norfolk.

- 4.13 The new draft policy should therefore aim to discourage the re-use of beneficial tourist accommodation (except when specific criteria are met), as displacing the existing tourist use would not contribute positively to sustaining the rural economy.

## **5 Conclusions**

- 5.1 The approach to tourism development is a key concern for the Local Plan to address. The approaches set out in this report represent Officer's view on achieving a balance between supporting the District's tourism economy with protecting the assets and attractions that draw people into the area. In the parts of the district which are subject to specific protective designations such as the AONB, policies are generally more restrictive but nevertheless allow for business expansions and proposals which deliver improvements to existing sites in terms of landscape, elsewhere in the district a more permissive approach would allowed particular for the use of land for camping and caravan sites'.

## **6 Recommendations**

**Members consider the contents of this report and confirm the provisional preferred tourism policies to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager**

## **7 Legal Implications and Risks**

The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence.

## **8 Financial Implications and Risks**

Failure to undertake plan preparation in accordance with national guidance and 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.

**Attached  
Appendix Pack– Proposed Policies**

## Approach to the Natural and Built Environment

**Summary:** This report considers parts of the draft policy approach to be taken in the new Local Plan in relation to the natural and built environment. It recommends a number of draft policies for public consultation.

**Recommendations:**

- 1. Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
- 2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All
Contact Officer, telephone number and email: Sarah Tudhope, Senior Planning Officer – 01263 516011 <a href="mailto:sarah.tudhope@north-norfolk.gov.uk">sarah.tudhope@north-norfolk.gov.uk</a>	

### 1. Introduction

1.1 The new Local Plan will include a number of policies relating to the natural and built environment. Such policies are intended to ensure that natural and historic environmental quality is maintained and, where possible, enhanced. Any policy requirements should be in line with legislative requirements, the national policy approach detailed in the National Planning Policy Framework (NPPF), and the advice provided in national Planning Practice Guidance (PPG).

1.2 This report seeks to establish draft policy approaches (see Appendix pack) to a number of the topics to be contained within the broad subject area of ‘the natural and built environment’ which are to be included in the forthcoming draft plan consultation. Six separate policies are recommended here, with others being reported separately.

- The Norfolk Coast Area of Outstanding Natural Beauty and The Broads National Park<sup>1</sup>
- Protection and Enhancement of Landscape and Settlement Character
- Biodiversity and Geology
- Trees and Hedgerows
- Protecting and Enhancing the Historic Environment
- Pollution and Hazard Prevention and Minimisation

<sup>1</sup> The Broads has the status of a national park and in 2016 the High Court and Court of Appeal upheld the Broads Authority decision to use the term ‘Broads National Park’. The Broads Authority is the equivalent of a National Park Authority but with some additional powers and responsibilities which include the management of the waterways.

The policies are intended to be read and applied in conjunction with the plan as a whole.

## **2. Background Context**

- 2.1 The current local plan (Core Strategy) adopted in 2008 contains a number of policies relating to the 'environment'. Generally, these seek to protect and enhance the natural and built environment; the emerging local plan will continue with these overarching objectives. On the whole it is considered that the existing policies operate well and therefore many of the draft policies recommended here for consultation are similar to the existing policies. However, where the Core Strategy made a distinction between policy 'SS4 Environment' as a strategic policy and then identified other policies (for the purposes of this report; policies EN1 Norfolk Coast Area of Outstanding Natural Beauty and The Broads, EN2 Protection and Enhancement of Landscape and Settlement Character, EN8 Protecting and Enhancing the Historic Environment, EN9 Biodiversity and Geology and EN13 Pollution and Hazard Prevention and Minimisation) as development control policies, it is considered, after having judged them against criteria set out in paragraphs 20 and 21 NPPF and paragraphs 074-077 of the PPG, that these are all strategic rather than non-strategic policies and adequately set out the priorities and objectives for North Norfolk without the need for a repeat of an overarching 'SS4' type policy.
- 2.2 Where the policies have been revised this has been to strengthen their operation and to comply with any changes in legislation, national policy and Government priorities that have occurred since adoption of the Core Strategy.

## **3. The Norfolk Coast Area of Outstanding Natural Beauty and The Broads National Park**

- 3.1 Areas of Outstanding Natural Beauty (AONB) and National Parks are national landscape designations afforded the highest status of protection for their landscape and scenic quality. The Norfolk Coast AONB and The Broads National Park are valuable assets for North Norfolk, in terms of character and beauty, sustainable tourism, quality of life and also as wildlife habitats. The NPPF (paragraphs 170 – 173) requires local plans to give great weight to conserving and enhancing landscape and scenic beauty in these areas and for the conservation and enhancement of their wildlife and cultural heritage.
- 3.2 The policy proposed is a revised version of the existing policy EN1. Small changes have been made to align with the overarching NPPF requirements for a positive strategy, by setting out when development will be supported in these areas, and to ensure consistency with the principles and objectives set out in the management plans for the specific areas. The proposed policy makes clear that proposals for major development<sup>2</sup> in the AONB will be refused except in exceptional circumstances. A footnote to the policy is recommended to make clear that for developments proposed on allocated sites the 'exceptional circumstances' have been assessed and determined during plan preparation.

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<sup>2</sup> The definition of 'major development' is not in this instance provided by the NPPF but is a matter for the decision maker in relation to each individual circumstance.

#### **4. Protection and Enhancement of Settlement Character**

- 4.1 In addition to requiring the highest protection for nationally designated landscapes the NPPF also requires that planning policies protect and enhance ‘valued landscapes’ commensurate with their quality as identified in the development plan. The visual character of North Norfolk’s landscapes, seascapes, townscapes, and the separation of settlements, both within and outside of designated areas, is highly valued by residents and visitors. Therefore, high priority should be given to the protection, conservation and enhancement of the landscape character and it is recommended to continue with a specific policy in this respect.
- 4.2 An updated Landscape Character Assessment (LCA) has been prepared which identifies and describes distinctive Landscape Types and Character Areas throughout North Norfolk and incorporates details on biodiversity and historic landscape features. Landscape character assessment is a tool used to identify what makes a place unique and serves as a framework for decision making. A Landscape Sensitivity Assessment (LSA) has also been prepared which has assessed the sensitivity of the District’s landscape to different types of renewable energy related development. Policy EN2 has been revised so that this information will be used to ensure that development proposals reflect the distinctive character, qualities and sensitivities of the area.

#### **5. Biodiversity and Geology**

- 5.1 The NPPF (paragraphs 170 – 177) requires local plans to protect and enhance biodiversity and geodiversity and Section 40 of the Natural Environment and Rural Communities Act 2006 imposes a duty on all public authorities to have regard to the purpose of conserving biodiversity (where ‘conserving’ includes restoring or enhancing a population or habitat). In 2018 the Government indicated that they intend to require developers to demonstrate how they are improving the biodiversity of a site, to deliver a biodiversity net gain.<sup>3</sup> This is part of their ambition to embed the wider principle of environmental net gain into development. Development that adopts a biodiversity net gain approach seeks to make its impact on the environment positive, delivering improvements through habitat creation or enhancement after avoiding or mitigating harm as far as possible.
- 5.2 The proposed policy supports this intention and will require applications, in accordance with the mitigation hierarchy, to consider the potential effects of the proposal on biodiversity; demonstrating how potential effects have been avoided, and where this is not possible, adequately mitigated for. Any residual harm, after all measures to prevent and adequately mitigate have been applied, must be adequately compensated for. Biodiversity net gains and contribution to ecological networks should be sought for all development, proportionate to the scale of the proposal and any potential impacts. A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible. This will include, but not be limited to, the protection of features such as trees, hedgerows, ponds, and woodland, designing buildings to include roosting or nesting spots and including landscaping within sites and along boundaries which can provide

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<sup>3</sup> Net gain consultation proposals, DeFRA Dec 2018

feeding and nesting opportunities as well as acting as habitat corridors aiding the passage of wildlife between sites.

## **6. Trees and Hedgerows**

- 6.1 In addition to recommending a policy for the protection of biodiversity and geodiversity generally, it is proposed that the Council consults on a policy specifically for the protection of trees and hedgerows. The NPPF (paragraph 170) requires that planning policies and decisions should recognise the wider benefits that trees and woodland contribute to natural and local environment and that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists (paragraph 175). It is considered that this policy will also help ensure that the Council meets its statutory biodiversity obligations as set out in the Natural Environment and Rural Communities Act 2006 (s.40; duty to conserve biodiversity).
- 6.2 Trees and hedgerows form an essential part of North Norfolk's landscape character not only by enhancing the aesthetics of an area, the quality of the environment and by providing a habitat for a range of wildlife but by delivering health, amenity, climate change and water management benefits. The policy will make clear to developers the importance of protecting our trees and hedgerows from harm, including loss and deterioration and that compensatory replacement provision will be required where necessary.

## **7. Protecting and Enhancing the Historic Environment**

- 7.1 The national approach towards the protection and enhancement of the historic environment has evolved since the adoption of the Core Strategy and it is recognised that Policy EN8 is out of date, particularly in relation to key distinctions that have been drawn between designated and non-designated assets and harm that is substantial and less than substantial harm. The NPPF (paragraph 185) states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment and that local plans should include strategic policies to "make sufficient provision for ...conservation and enhancement of the ...historic environment" (paragraph 20).
- 7.2 The PPG states that any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the NPPF and the local plan. The NPPF places strong emphasis on the importance of the conservation of designated and non-designated assets (paragraphs 182 – 202) and clearly sets out matters to be taken into account in the determination of planning and other applications and the weight to be given to the significance of the asset and the level of harm that a development proposal will lead to.
- 7.3 The proposed policy is intended to ensure that the Council takes a positive approach to managing change within the historic environment whilst giving appropriate weight to the significance of a heritage asset and the level of harm that would result from a proposal.

- 7.4 The District has a rich historic environment which in terms of designated heritage assets has 2265 Listed Buildings, including 94 Grade I and 202 Grade II\*, 81 Conservation Areas, 86 Scheduled Monuments and 33 Historic Parks and Gardens. There are also currently 190 buildings on the Council's Local List. This is a list of buildings that, whilst they do not fully meet the criteria for national listing, are considered of architectural or historical importance for the area. The effect on an application on the significance of a non-designated heritage asset is a material consideration when assessing development proposals and local listing strengthens the case for retention of a historic building. The requirements of the policy will equally apply to any local heritage assets identified and listed in adopted Neighbourhood plans. The policy also seeks to ensure that development proposals are determined in accordance with the Council's Conservation Area Appraisals and Management Plans which are also material considerations.

## **8. Pollution and Hazard Prevention and Minimisation**

- 8.1 The Local Plan plays a key role in determining the location of development that may give rise to pollution, either directly or indirectly, and in ensuring that other uses and development are not, as far as possible, affected by major existing or potential sources of pollution. The NPPF sets out in paragraphs 178-183 requirements related to ground conditions and pollution. It is considered that Policy EN13 accords with these requirements on the whole and only needs minor alteration by way of incorporating specific reference to nocturnal character and light pollution. In particular, to strengthen protection for designated dark skies areas both within and outside of the District.

## **9. Recommendation**

- 1. Members consider the contents of this report and confirm the provisional preferred policies to be included within the First Draft Local Plan for consultation.**
- 2. The final policy wording and content of the consultation document is delegated to the Planning Policy Manager**

## **10. Legal Implications and Risks**

The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence.

## **11. Financial Implications and Risks**

Failure to undertake plan preparation in accordance with national guidance and 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 – Approach to Green Infrastructure**

Summary: This report considers the draft policy approach to be taken in relation to Green Infrastructure.

- Recommendations:
- **Members consider the contents of this report and confirm the approach to Green Infrastructure and the draft policy to be included within the First Draft Local Plan for consultation.**
  - **The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Member(s)	<b>Ward(s) affected</b>
All Members	<b>All Wards</b>
Contact Officer, telephone number and email:	
Stuart Harrison, Senior Planning Officer. 01263 513308. stuart.harrison@north-norfolk.gov.uk	

**1. Introduction**

- 1.1 This report sets out the suggested approach in relation to Green Infrastructure in the emerging Local Plan. It outlines the work that is ongoing to produce a North Norfolk Green Infrastructure Strategy and details the suggested draft policy for Green Infrastructure.
- 1.2 Green spaces, open spaces, coastal areas, the rivers and Broads are an important part of the character of North Norfolk. They are areas of countryside, natural green spaces and provide areas of open space within our towns and villages and encourage people to be active and enjoy their surroundings. Many of these spaces are of historical value and are important to the setting and perception of the places we live in. These areas form part of the green network in North Norfolk and provide valuable habitats for wildlife – a number of which have the highest national, european and international designations.
- 1.3 Green infrastructure is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It is an important part of our communities and contributes towards the identity of North Norfolk. The policy approach in the emerging Local Plan has been informed by the contents of the emerging interim North Norfolk Green Infrastructure Strategy and a wide evidence base.

**2. Existing Policy in the Core Strategy**

- 2.1 The existing Core Strategy, adopted in 2008, includes aims to improve the natural environment and to facilitate increased walking and cycling and to ensure adequate provision of accessible greenspaces (Core Aim 6). It was envisaged that these aims would be achieved through Core Strategy strategic spatial policies and development management policies as described below.



2.2 **Strategic Policy SS4 (Environment)** aims to protect existing open space and areas designated for environmental purposes, requires new developments to include open space to meet locally defined targets, requires that development makes links to the surrounding countryside and seeks to create an ecological network.

Policy SS4 states that open spaces and areas of biodiversity interest will be protected from harm, and the restoration, enhancement, expansion and linking of these areas to create green networks will be encouraged through a variety of measures such as:

- maximising opportunities for creation of new green infrastructure and networks in sites allocated for development;
- creating green networks to link urban areas to the countryside;
- the designation of Local Nature Reserves and County Wildlife Sites;
- appropriate management of valuable areas, such as County Wildlife Sites;
- minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network as identified in the North Norfolk ecological network report;
- progress towards Biodiversity Action Plan targets; and
- conservation and enhancement of Sites of Special Scientific Interest (SSSI) in accordance with the Wildlife and Countryside Act.

2.4 **Strategic Policy SS6 (Access and Infrastructure)** includes provision that new development should be supported by, and have good access to, infrastructure, open space, public services and utilities. Policy SS6 also seeks to protect, enhance and promote Public Rights of Way and for new development to create convenient and attractive links within development and to the surrounding area, assist with creation of a network of accessible greenspace and provide links to public transport and walking and cycling networks.

2.5 The existing Core Strategy also has a policy for the provision and protection of **Open Space in Policy CT1** which recognises that there are many valuable open spaces across North Norfolk and that those within settlement boundaries may be subject to pressure for residential development. The purpose of the policy is to therefore safeguard the large number of open spaces by restricting the types of development which would be allowed.

2.6 A number of these environmental aims and policies in the Core Strategy will be taken forward and updated in a new policy approach in the Local Plan, reflecting the up to date evidence and national planning policy and guidance.

### 3. National Planning Policy

3.1 The national policy approach to delivering green infrastructure is set out in the National Planning Policy Framework and supporting Planning Practice Guidance.

***Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.***  
***National Planning Policy Framework 2018***

3.2 The National Planning Policy Framework states that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and **green infrastructure**.

- 3.3 Paragraph 020 of the NPPF suggests to assist in planning positively for green infrastructure local planning authorities may wish to **prepare an authority-wide green infrastructure framework or strategy**.
- 3.4 The production of a green infrastructure strategy should be evidence-based by, for example, including an assessment of current green infrastructure provision that identifies gaps in the network and the components and opportunities for improvement. The assessment can inform the role of green infrastructure in local and neighbourhood plans, infrastructure delivery plans and Community Infrastructure Levy (CIL) schedules.
- 3.5 Paragraph 029 states that Local Plans should identify the strategic location of existing and proposed green infrastructure networks. Where appropriate, supplementary planning documents can set out how the planning, design and management components of the green infrastructure strategy for the area will be delivered.
- 3.6 The NPPF references to Green Infrastructure have been considered within the preparing of the draft policies.

## 4 The Evidence Base

- 4.1 The Green Infrastructure Strategy brings together key findings detailed in the evidence. The evidence base draws together a number of core documents which have been used to identify existing issues related to green infrastructure such as habitat corridors, location of greenspaces, how accessible they are to the community and whether green spaces are important for wildlife.
- 4.2 Key documents in the Council's evidence base include:
- The Norfolk Green Infrastructure Mapping Project 2018
  - North Norfolk State of the Environment Report 2011
  - North Norfolk Ecological Network Mapping
  - Recreational Impacts Study 2017
  - Norfolk Coast Partnership AONB Management Plan and other documents
  - Natural England's Accessible Natural Greenspace Report 2010 and Mapping 2018
  - North Norfolk Open Space and Playing Pitch Strategy (emerging)
  - Norfolk Rights of Way Improvement Plan and Norfolk Access Improvement Plan 2018-2028
  - The Strategic Flood Risk Assessment and Natural Flood Management Opportunities mapping
  - Broadland Rivers Catchment Plan

### Landscape Character

- 4.4. The guidelines contained in the 2018 Landscape Character Assessment (LCA) will also inform the green infrastructure strategy and the delivery of green infrastructure proposals. The LCA is intended to provide landscape context for policies and proposals within the emerging Local Plan, inform the determination of planning applications, and inform the management of future change. This character assessment updates the District's previous LCA. The LCA is a tool to identify what makes a place unique, and can serve as a framework for decision making that respects local distinctiveness.

## 5 Suggested Policy Approach

- 5.1 The **North Norfolk Green Infrastructure Strategy** will be produced and this document will inform the Local Plan policy and the site allocations in relation to what green infrastructure deficits there may be in the area and what specific green infrastructure proposals that a site is expected to deliver.

- 5.2 For the purposes of the upcoming public consultation an *interim* Green Infrastructure Strategy will be produced. The G.I. Strategy will be refined and finalised over the coming 6 months and brought back to Working Party for consideration. It is intended that the strategy will inform future iterations of the policy.
- 5.3 The G.I. Strategy will provide a coordinated approach towards improving the existing green infrastructure network and by ensuring the right types of green spaces and enhancements are provided where they are most needed. The G.I. Strategy will make sure that improvements are made in areas where they will provide the greatest benefit.
- 5.4 The G.I. Strategy will set out a strategic approach to improve the green spaces and the connections between them that will create a well-connected green infrastructure network to benefit communities, wildlife and the wider environment.
- 5.5 The North Norfolk Green Infrastructure Strategy:
- Brings together information from different evidence bases, identifies potential ways to improve existing shortfalls and prioritises areas most in need of improvement.
  - Sets out key principles to ensure the right types of green infrastructure are provided where they are most needed. Considering how green spaces can be included in a proposal early in the design process will improve the overall quality of new development.
  - Identifies gaps in the existing green infrastructure network. This will help the Council, Town and Parish Councils, developers, community groups and external organisations to proactively take advantage of opportunities when they arise to improve the quality and connectivity of the network.
  - Provides a coordinated approach to the planning and delivery of green infrastructure to maximise the long-term benefit for people and wildlife.
- 5.6 To make the Green Infrastructure Strategy easier to interpret, the key findings and areas of enhancement have been set out in two sections setting out information at different scales:
- **District Wide Strategy** which provides a strategic overview of existing green space provision across the District and shows strategic links between ecological habitats including maps and key findings.
  - **Major Growth Town Strategies** provide a greater detailed account of key issues, and measures, that could be considered to improve local green infrastructure in **Cromer, Fakenham and North Walsham**.
- 5.7 The key green infrastructure improvements for the three major growth towns will be illustrated on G.I Strategy settlement maps which show where existing green infrastructure is located, an overview of key findings in the area and a number actions to improve green infrastructure.
- 5.8 **Draft Local Plan Policy**
- 5.9 The draft policy can be seen in the attached appendix pack and the following will be included as the **supporting text** to provide the context, reasons and justification for the Green Infrastructure:

The purpose of this policy is to safeguard, retain and enhance the network of green infrastructure.  
 The network of green infrastructure in North Norfolk will be safeguarded, retained and enhanced in line with the North Norfolk Green Infrastructure Strategy. The protection and enhancement of the green infrastructure network will be sought through the development management process in line with the

principles, priorities and action plans detailed in the Green Infrastructure Strategy including mitigating towards recreational impacts.

5.10 The following policy for Green Infrastructure is proposed:

**Policy #**

**Green Infrastructure**

New developments will have regard to the green infrastructure strategy and incorporate green infrastructure principles into proposals, including:

- the delivery of new green infrastructure;
- the mitigation and enhancement of existing green infrastructure;
- improving green infrastructure connectivity;

Through its layout and design, new development should respond to the location of existing green infrastructure and deliver appropriate uses and functions.

Development in Cromer, Fakenham and North Walsham should consider the Green Infrastructure Strategy for each town and incorporate green infrastructure proposals in line with the detailed Action Plans.

**4. Other Environmental Policies**

4.1 The Local Plan will contain other policies on the Natural Environment and providing for healthy communities. There will be discreet policy areas including but not limited to Biodiversity & Geodiversity, Landscape, Trees and Hedgerows, Open Space and Public Rights of Way.

4.2 The green infrastructure policy will provide an overarching policy for the delivery of green infrastructure and the G.I. Strategy will provide detail on where new green infrastructure needs to be provided. However, the broader suite of policies will provide more detail in these areas and will provide a robust environmental policy backbone to the green infrastructure policy and the Local Plan as a whole.

**5 Recommendations**

**Members consider the contents of this report and confirm the approach to Green Infrastructure and the policy to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

**6 Legal Implications and Risks**

The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence.

**7 Financial Implications and Risks**

Failure to undertake plan preparation in accordance with national guidance and 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 Preparation – Renewable Energy**

Summary: This report considers the draft policy approach to be taken in the new Local Plan in relation to renewable energy. It recommends a draft policy for public consultation.

Recommendations: **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**

**The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

Cabinet Members(s)	Ward(s) Affected
All Members	All Wards
Contact Officer(s), telephone number and email: Jodie Rhymes, Senior Planning Officer - 01263 516304 <a href="mailto:Jodie.Rhymes@north-norfolk.gov.uk">Jodie.Rhymes@north-norfolk.gov.uk</a> 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 In an effort to mitigate climate change, the UK is committed to reducing its greenhouse gas emissions by 80% by 2050 and sourcing at least 15% of its energy from renewable sources by 2020. In 2013/14 this target was almost met, and wind energy contributed 9% of the UK’s power needs, and at points throughout the year surpassed nuclear energy in its contribution to day to day energy needs.
- 1.2 It is clear that renewable energy will continue to play an important role in enabling the UK to meet its climate change targets and local planning authorities must play their part in promoting renewable energy and facilitating appropriate new development through the planning system. The NPPF promotes the provision of a positive strategy to encourage the use of renewable and low carbon energy.
- 1.3 There are many different types of renewable energy including solar energy, wind, wave and biomass. All of these technologies have a role to play, alongside energy efficiency, in meeting government CO2 reduction targets. The Council supports and encourages the generation of energy from renewable sources as evidenced through the significant number of solar farms across the District. Whilst most recognise and support the benefits of renewable energy it remains the case that individual development proposals are controversial, especially wind turbines which raise concerns in relation to potential impacts including those on landscape character,

wildlife conservation and residential amenity. Local planning authorities, whilst needing to embrace renewable energy must at the same time ensure that new development is of an appropriate scale and location so as not to give rise to unacceptable impacts on local communities and the special character of local areas.

1.4 The Council is in the process of preparing its Local Plan. This will set out the key elements for the planning framework for North Norfolk covering the period 2016 to 2036. The new Local Plan will include a policy on renewable energy. This report seeks to establish the draft policy approach (attached in the appendix pack) which can be included in the forthcoming draft plan consultation.

## **2. Policy Context**

2.1 The existing Core Strategy, adopted in 2008, includes Policy EN7 which is broadly supportive of renewable energy. The Policy seeks to support renewable energy proposals in the context of sustainable development and climate change, taking account of the wide environment, social and economic benefits of renewable energy whilst also ensuring that proposals do not have significant adverse effects on the landscape, townscape, historical features, residential amenity and conservation/ biodiversity considerations.

2.2 The policy does not allow for large scale renewable energy infrastructure in areas of national importance such as the Area of Outstanding Natural Beauty (AONB) unless it can be demonstrated that the objectives of the designation are not compromised.

2.3 Since the adoption of the Core Strategy there has been a shift in the national approach in this policy area.

2.4 On the 18th June 2015 the Secretary of State for Communities and Local Government (Greg Clark) through a Written Ministerial Statement set out new national provisions relating to wind energy development. The Statement set out that local planning authorities should only grant planning permission for proposals for wind energy development if the development site is in an area identified as suitable for wind energy development. It goes on to note that these areas need to be allocated clearly in a Local or Neighbourhood Plan and following consultation can be demonstrated that it has backing of the local community.

2.5 The 2018 National Planning Policy Framework has been amended to reflect these changes, and states that plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

2.6 The NPPF in paragraph 152 goes on to state that local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

- 2.7 Specifically, in relation to dealing with planning applications for one and more wind turbines, the NPPF states that turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.
- 2.8 Due to these changes in national policy a revised approach relating to renewable energy is required in the emerging Local Plan and it is necessary to consider identifying areas within the district that are potentially suitable for renewable energy.
- 2.9 An initial steer was given from the Members at the November 2017 Working Party to what might be considered an appropriate way to manage wind energy development through the emerging Local Plan and exploring the potential policy approaches that the Local Plan could take in identifying suitable areas for wind energy development. The preferred approach was to develop a policy approach based around the identification of high value landscape /designations where there would be policy prohibition of wind turbines in these areas and a criteria based policy to aid in the determination of applications for those outside of the sensitive area. It was also recognised that further evidence would be required to help differentiate between sensitivity of landscape types. Members also requested that a number of former airfields be evaluated in terms of landscape impacts.

### **3. Landscape Sensitivity Study**

- 3.1 The Landscape Sensitivity Study, 2018 (LSS) published in November 2018, provides evidence and context for policies within the emerging Local Plan and has been used to inform the emerging Renewable Energy policy and to assist in the identification of potentially suitable areas for wind turbines. LSS uses the updated 2018 Landscape Character Assessment (LCA) as the basis for identifying the overall sensitivity to different renewable energy developments for each Landscape Character Type (LCT), indicating areas that may be more or less sensitive in the landscape and visual terms.
- 3.2 The study (Figures 5.1 – 5.3) shows the sensitivity for wind energy development of different scales and other types of renewable energy development. And shows that in the case of:
- [Large scale](#) (80m hub, 130m tip) wind turbines; the entire District has high sensitivity
  - [Medium scale](#) (60m hub, 100m tip) wind turbines; the Area of Outstanding Natural Beauty (AONB), Wooded Glacial Ridge and the River Valleys Landscape types have high sensitivity, the remaining areas of the District are classified as Moderate-High sensitivity.
  - [Small scale](#) (30m hub, 45m tip) wind turbines; Parts of the AONB is classed as having high sensitivity, the rest of the AONB, River Valleys and Wooded Glacial Ridge landscape types have moderate – high sensitivity and the remainder of the District has moderate – low sensitivity.

LCT	Large scale wind		Medium scale wind		Small scale wind		Solar PV		Onshore cable routes		Industrial type dev		Reservoir	
	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB	OUT AONB	IN AONB
Rolling Open Farmland	H	H	MH	H	M	H	MH	H	M	MH	M	H	M	MH
Tributary Farmland	H	H	MH	H	M	H	MH	H	M	MH	M	H	M	MH
Low Plains Farmland	H		MH		M		M		M		M		M	
River Valleys	H	H	H	H	MH	H	H	H	MH	H	MH	H	MH	H
Settled Farmland	H		MH		M		M		M		M		M	
Coastal Plain	H	H	MH	H	M	H	M	H	LM	MH	M	H	M	MH
Coastal Shelf	H	H	H	H	MH	H	MH	H	MH	MH	MH	H	MH	MH
Wooded Ridge	H	H	H	H	MH	H	MH	H	MH	H	MH	H	MH	H
Rolling Heath & Arable		H		H		H		H		MH		H		MH
Drained Coastal Marshes		H		H		H		H		H		H		H
Open Coastal Marshes		H		H		H		H		H		H		H

Figure 1: Sensitivity ratings for typical scales of development by LCT

3.3 The study also shows the sensitivity for wind energy development of different scales and other types of renewable energy development within a range of airfields across the District and shows that in the case of:

- Large scale (80m hub, 130m tip) wind turbines; all airfields have high or moderate-high sensitivity
- Medium scale (60m hub, 100m tip) wind turbines; North Creake (close to the AONB) and Langham (within the AONB) are classified as high sensitivity and Coltishall classified as moderate-high sensitivity. The remaining areas of the District are classified as moderate sensitivity.



- Small scale (30m hub, 45m tip) wind turbines; the majority of the District is classified as having low- moderate sensitivity. Whilst North Creake (close to the AONB) and Langham (within the AONB) classified as moderate-high and Coltishall is moderate. The remaining airfields are classified as low-moderate.

3.4 Airfield sensitivity is typically lower than sensitivity of the Landscape Type in which each site is located, although there is generally less difference in relation to wind turbines, which have a greater impact on surrounding landscapes than the lower height development types.

Airfield (LCT)	Large scale wind	Medium scale wind	Small scale wind	Solar PV	Onshore cable routes	Industrial type dev	Reservoir
West Raynham (ROF)	MH	M	LM	L	L	L	LM
Sculthorpe (ROF)	MH	M	LM	L	L	L	L
North Creake (ROF)	H	H	MH	LM	LM	M	M
Little Snoring (TF)	MH	M	LM	M	LM	M	M
Langham (TF)	H	H	MH	M	M	MH	M
Coltishall (LPF)	MH	MH	M	LM	LM	LM	LM

Figure 2: Sensitivity ratings for typical scales of development by LCT in Airfields

#### 4. Suitable Areas for Wind Energy in North Norfolk

4.1 Identifying areas suitable for renewable energy in plans gives greater certainty as to where such development will be permitted. In the case of wind turbines, a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a Local or Neighbourhood Plan.

4.2 The proposed preferred approach seeks to identify areas suitable for wind energy development based on the findings of the LCA and LSS as summarised above.

4.3 Wind energy development proposals will be supported in principle where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed 'Moderate- High'. This sensitivity classification maintains opportunities for wind energy development of up to 60m hub/100m tip height across the least sensitive parts of the District. Within the area identified as suitable for wind energy development all proposals will be assessed against the landscape evidence base and a comprehensive criteria based policy.

4.4 Wind energy development proposals in airfields will be considered potentially suitable where the sensitivity does not exceed Moderate- High, larger scale wind turbines in

principle will be acceptable in some airfield locations subject to compliance with the Renewable Energy Policy.

- 4.5 The policy does not wish to preclude all wind energy development in the District, but rather retain the option of supporting wind energy development where it is of an appropriate and acceptable scale and is supported by the affected local community. The policy will be subject to Habitats Regulation Assessment and consultation.

## **5. Draft Policy and Supporting Text**

- 5.1 In establishing the preferred policy approach, the Council have sought to develop a balanced and pragmatic approach which can only be enabled where they address all appropriate planning considerations and have community support, whilst continuing to enable appropriate opportunities to come forward; including community-led proposals.

## **6. Recommendation:**

- **Members consider the contents of this report and confirm the provisional preferred policy approaches to be included within the First Draft Local Plan for consultation.**
- **The final policy wording and content of the consultation document is delegated to the Planning Policy Manager.**

## **7. Legal Implications and Risks**

The Council must produce a Plan which complies with various regulatory and legal requirements and in determining its preferred policy approaches they must be justified and underpinned by evidence.

## **8. Financial Implications and Risks**

Failure to undertake plan preparation in accordance with national guidance and 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.

**FIRST DRAFT LOCAL PLAN (PART 1) CONSULTATION:  
COMMUNICATIONS & ENGAGEMENT PLAN**

Summary: This report seeks to agree the consultation arrangements for First Draft Local Plan (Part 1).

Recommendations: **That the Working Party recommend to Cabinet to agree the Communications & Engagement Plan as the basis for conducting public consultation on the First Draft Local Plan (Part 1), Supplementary Planning Documents (SPDs), and supporting documents.**

**To delegate final decisions as to which promotional tasks and events are carried out to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p><b>Contact Officer, telephone number and email:</b></p> <p>Iain Withington, Planning Policy Team Leader  <a href="mailto:iain.withington@north-norfolk.gov.uk">iain.withington@north-norfolk.gov.uk</a>                      Chris Brown, Project Support Officer  <a href="mailto:chris.brown@north-norfolk.gov.uk">chris.brown@north-norfolk.gov.uk</a> (01263 516318)</p>	

**1. Introduction**

- 1.1 This report presents a draft programme of community engagement for the First Draft Local Plan (Part 1) Consultation. The programme includes tandem consultations on a new North Norfolk Design Guide, Draft Landscape Character Assessment and Draft Landscape Sensitivity Assessment which are proposed to be adopted as Supplementary Planning Documents (SPDs).
- 1.2 The report details what has already been undertaken, what we are required to do in the plan making regulations, and what we propose to do in order that those with an interest in the Local Plan have the opportunity to engage in this important stage of the process and are suitably informed.
- 1.3 In October 2018 a Rapid Review of the Local Plan was conducted by Overview & Scrutiny Committee. The purpose was to identify and mitigate any perceived risks to the delivery of the Local Plan. One of the recommendations was to produce a Communications & Engagement Plan detailing the consultation that would be carried out with communities.

**2. Background**

- 2.1 The way in which Local Plans are to be prepared is specified in regulations. There are two specific regulatory stages of public consultation referred to as Regulation 18 and Regulation 19. The Local Plan Review was initiated in May 2015. A number of consultation events took place at the time as part of the launch, including an 8-week

Regulation 18<sup>1</sup> consultation entitled 'Subjects of the Local Plan'. The principle purpose of this consultation was to *notify* specific consultees of the Council's intention to prepare a Local Plan and to invite representations as to which subjects the Local Plan should address. This was a high level consultation which did not at that stage include any details of proposed policies.

### **Regulation 18: First Draft Local Plan (Part 1) – the current stage**

- 2.2 A period of formal public consultation is now proposed to seek feedback from the community and statutory consultees regarding the emerging content of the First Draft Local Plan (Part 1). This will present drafts of the proposed policies, provisional preferred development sites in the larger towns and four selected villages (Mundesley, Ludham, Briston and Blakeney) together with details of all the alternatives considered. As well as the Draft Plan and alternative options the Council will publish a large number of supporting documents including a comprehensive library of evidence and a number of background papers explaining various aspects of the plan. As outlined above views will also be sought on a new Design Guide and Landscape Character Assessments which are referred to in the draft policies and which will ultimately be adopted by the Council as formal Supplementary Planning Documents (SPDs).
- 2.3 A further consultation on the First Draft Local Plan (Part 2) is expected to take place later in 2019. This second section of the Local Plan will include further proposed allocations in identified smaller villages as resolved at the Planning Policy & Built Heritage Working Party meeting of 15 October 2018. It may also offer the opportunity to consult further on any updated approaches to the strategic policies brought about by the Part 1 consultation.

## **3. What we are required to do?**

### **National Legislation, Policy & Guidance**

- 3.1 The Local Plan consultation is informed by an adopted Statement of Community Involvement (SCI). This lays down the ground rules for public engagement both when preparing Local Plans and dealing with planning applications and is informed by national policy and legislative processes. The latest and most up to date SCI was adopted by Cabinet on 5 January 2016. The engagement programme outlined in this report is designed to meet and exceed the objectives of the SCI and to ensure we obtain as much constructive feedback from the community as is possible within staff and financial resource constraints.
- 3.2 Key documentation that guides Local Plan production is:
- Town & Country Planning (Local Planning) (England) Regulations 2012 (as amended)
  - National Planning Policy Framework (NPPF)
  - National Planning Policy Guidance (NPPG)
- 3.3 The Local Planning Regulations require the Council to notify relevant consultees of the intention to prepare a Local Plan and to invite representations as to which subjects the Local Plan should address. This regulation has already been met and the Council is not required under these regulations to undertake any further period of public consultation until just prior to the final Plan being submitted for examination.
- 3.4 However, paragraph 16 of the NPPF sets out that '*Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators, and statutory consultees*'. It is not considered that the Council can rely solely on the previous

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<sup>1</sup> Regulation 18 - The Town and Country Planning (Local Planning) (England) Regulations 2012

consultation as a way of meeting the requirements of the NPPF in this respect. The proposals for engagement in this report are aimed at bolstering the Council's position in relation to shaping the Plan by 'early, proportionate and effective engagement'.

#### 4. What have we done already?

- 4.1 The process to prepare a Local Plan is a long and complex one. A significant amount of engagement has already taken place during the evidence gathering stages of Plan preparation. This includes regular working party meetings, open to all Members and the general public, specific Town and Parish Workshops, site assessment familiarisation trips, where invitations were extended to the relevant town and parish councils and open invitations to speak at regular town and parish AGM's / meetings. More recently in November officers undertook two targeted town and parish briefings on the emerging Local Plan and consultation arrangements. Throughout the process Officers have been in continual discussions with site owners, responded to queries from members of the public and organisations, liaised with agents, developers, service providers and other Norfolk authorities and internal colleagues and engaged in cross boundary co-operation through the Duty to Co-operate.
- 4.2 Specific engagement exercises already completed as part of the Local Plan process are shown at **Appendix 1**. Full details of the engagement carried out as part of the Local Plan process and how it has been taken into account will be published in a 'Consultation Statement' as part of this consultation and at all future stages.

#### 5. Communication & Engagement Plan - First Draft Plan (Part 1) Consultation

5.1 The proposed approach to consultation and engagement is divided into three areas:

- a) promotion before and during the consultation period
- b) document production and availability
- c) local consultation events

##### a) promotion before and during the consultation period

5.2 The consultation will be promoted by officers and the Council's communication team through a variety of methods including media releases, social media, the use of newsletters, posters and events in person. The details are outlined in the following table:

**Table 1 - Proposed Consultation Arrangements: Promotion**

Promotion Task (Intended)	Involving	Proposed implementation
<b>Launch Events</b>	<ul style="list-style-type: none"> <li>• Members Briefing – All Members to explain the highlights of the Local Plan and the consultation arrangements.</li> </ul>	Early Feb/ 1st week of consultation
<b>Local Plan Newsletter (Task 1)</b>	<ul style="list-style-type: none"> <li>• All on Consultee Database (including all Parish &amp; Town Councils and All Members) advising of public drop-in events.</li> </ul>	Early Feb/1 <sup>st</sup> week of consultation
<b>Targeted Letters</b>	<p>The Consultation Database contains details of those individuals and interested parties that have registered to receive direct updates such as developers and agents (currently 1750 individuals and organisations). It also includes organisations representing a range of those considered harder to engage. Targeted letters with relevant information may be appropriate where engagement from that particular group is known to not normally be received e.g.</p> <ul style="list-style-type: none"> <li>• Disability / Health Groups</li> </ul>	February / March

	<ul style="list-style-type: none"> <li>• Older / Younger Peoples Groups</li> <li>• Norfolk Voluntary Services</li> <li>• Schools / PTAs</li> </ul> <p>List to be finalised.</p>	
<p><b>News Release</b> Comms Team to issue 2 x news releases prior to and during the consultation</p>	<ul style="list-style-type: none"> <li>• EDP, North Norfolk News, Fakenham &amp; Wells Times, Fakenham Sun</li> <li>• Radio Norfolk, Heart, North Norfolk Radio, KLFM</li> <li>• Look East, Anglia News, That's TV Norfolk</li> <li>• Just Cromer, Just Holt, Just North Walsham, Just Sheringham, Just Wroxham &amp; Coltishall, North Norfolk Post, Cromer Times, NW Times, Holt Chronicle, Sheringham Independent, Norfolk On My Mind</li> <li>• Town &amp; Country News</li> </ul>	<p>1) w/c 4 Feb/ early Feb 2) 2 weeks prior to close of consultation</p>
<p><b>Paid Advertising</b> Sponsored Ads Comms Team</p>	<ul style="list-style-type: none"> <li>• Facebook / Instagram (may be seen by a younger audience + local organisations)</li> </ul>	February / March
<p><b>Consultation Notice / Poster</b> Distributed to P&amp;TCs + Members for placement in the locality and announcements at public meetings</p>	<ul style="list-style-type: none"> <li>• Parish notice boards / parish meetings</li> </ul>	Early Feb/ 1st week of consultation
<p><b>Social Media</b> NNDC posts throughout the consultation period</p>	<ul style="list-style-type: none"> <li>• Facebook / Instagram</li> <li>• Twitter</li> </ul>	February / March
<p>Other information outlets to be utilised</p>	<ul style="list-style-type: none"> <li>• NNDC Home Page (see <b>Appendix 2</b>)</li> <li>• Staff Intranet</li> <li>• Members Bulletin</li> <li>• NNDC Local Plan Web Page</li> <li>• NNDC News Page</li> <li>• NNDC 'Council Consultations' web page</li> </ul>	w/c 11 February
<b>Optional</b>		
<p>Issue of summary consultation newsletter with annual council tax mail out</p>	<ul style="list-style-type: none"> <li>• Consultation Newsletter summarising key issues in LP and how to be involved letter could be included in Council Tax &amp; Business Rates annual billing mail out.</li> </ul>	Advance preparation required – issue wc 11 March

## Newsletter

- 5.3 A Newsletter will be distributed prior to the consultation start date including information such as where documents can be accessed and how comments can be submitted. The Newsletter is an effective way of informing our existing audience (consultee database) and is available to the public via our website. The Newsletter can easily be shared via social media and taken away at drop-in events.
- 5.4 An opportunity is available to issue the Newsletter (and / or a short summary version of the key topics of the Local Plan) in tandem with the annual Council Tax & Business Rates mail-out (to be issued week of 11 March). This approach would target 54,000 residential and 7,000 commercial premises in North Norfolk.
- 5.5 If Members wish to utilise the option of notifying all residents and commercial premises then some consideration is advised. A consequence of this action could result in considerably higher numbers of representations being submitted, including increased repetition of comments already made. This could have an impact on staff resource which would need to be addressed. Conversely, this option would provide valuable assurance that the community has been reached and would strengthen the Council's evidence of effective engagement at the examination stage.

5.6 A Newsletter / leaflet issued 11-15<sup>th</sup> March (the Council Tax & Business Rates deadline) would allow just one week for response before the currently planned consultation end date. Should this option be taken up by Members the consultation period may need to be adjusted to allow sufficient response time. The consultation period is covered in section 6 of this report. Slippage in the initial start date would positively impact the effectiveness of this option.

### b) Document production

5.7 The consultation includes a number of statutory documents and further background papers and supporting evidence, as detailed in **Appendix 3**. It is not practical or cost effective to print hard copies of all material. The consultation documents are written and published using a bespoke online publishing software and Consultation Portal. In-line with this, modern working practice, efficiency and as advised in the National Planning Policy Framework, consultation responses will be encouraged through the online portal. All electronic documents will be available on the council's website. A number of hard copy documents however will be produced of the main statutory consultation documents.

5.8 Objective Keystone is the document creation and engagement software used to create the Local Plan and supporting documents. This powerful tool allows us to publish documents to a Consultation Portal where responses can be submitted and following the consultation responses can be analysed in accordance with each policy / issue.

5.9 The details of physical consultation materials are outlined in the table below:

**Table 2 - Proposed Consultation Materials**

Document	Details
<b>Main Consultation Documents</b> (Appendix C)	Copies of main consultation documents will be printed and made available at Council consultation points and at events.
<b>Newsletter</b>	Primarily distributed by email / online. Copies will be printed and distributed to: <ul style="list-style-type: none"> <li>• Members</li> <li>• Libraries (including Mobile Libraries where in service)</li> <li>• Council Offices</li> <li>• Drop-in Events (including for public to take away on request)</li> </ul>
<b>Event Displays</b>	Design and creation of exhibition material for consultation drop-in events. To include headline information about the Part 1 plan, town and site specific information including proposed allocations, and details of how to get involved.
<b>Comments Form</b>	Those wishing to make comments will be directed to the online method. Copies of paper representation forms will be available on request at Council offices, libraries and at drop-in events.

### c) Consultation Events

5.10 The main vehicle for engaging the public will be via a series of public drop-in exhibitions. The exhibitions aim to be informal and provide the public with:

- A static display giving a brief overview of the Local Plan process, plan English information on the key aspects being addressed in this consultation, details of site specific information relating to the locality, and how to respond.

- Access to senior policy planners at each event to answer questions and offer guidance. Additional help may be sought from other planning staff as required.
- Hard copies of summary documents and Newsletter to take away.
- Comment form

5.11 It is not recommended that representations are made at consultation events to officers.

5.12 Feedback from previous events clearly indicates a preference for evening meetings and therefore it is suggested that all events are aligned to include evening slots as well as normal working hours.

**Table 3 - Proposed Drop-in Events** (all to be held in first two weeks of consultation period)

<b>Drop-In Events</b>		
Blakeney	Village Hall, Langham Road	Date TBC 2.30 - 7pm
Briston & Melton Constable	TBC	Date TBC 2.30 - 7pm
Cromer	Parish Hall	Date TBC 2.30 - 7pm
Fakenham	Community Centre, Oak Street	Date TBC 2.30- 7pm
Holt	Community Centre, Kerridge Way	Date TBC 2.30 - 7pm
Hoveton	Broadland Youth & Community Centre, Stalham Road	Date TBC 2.30- 7 pm
Ludham	TBC	Date TBC 2.30- 7pm
Mundesley	Coronation Hall, Cromer Road	Date TBC 2.30- 7pm
North Walsham	Community Centre, New Road	Date TBC 12 - 8pm
Sheringham	Community Centre, Holway Road	Date TBC 2.30 – 7pm
Stalham	Town Hall, High Street	Date TBC 2.30 – 7pm
Wells next the Sea	The Maltings, Staithe Street	Date TBC 2.30 – 7pm

## 6 Other Considerations

### Consultation Period

6.1 It is proposed that the consultation period lasts for six weeks. Officers are currently working to a commencement date of Monday 11<sup>th</sup> February 2019. This remains conditional on sufficient progress being made and the consultation documents being finalised. A six week period would see the consultation end 25<sup>th</sup> March 2019.

6.2 A longer consultation period remains an option, however this would take the consultation further into the period of Purdah for the Local Government elections which starts on 26<sup>th</sup> March 2019. The elections are held on the 2<sup>nd</sup> May 2019. The Policy Team has obtained electoral and legal advice on this matter which concluded that no legal or procedural issues prevent part of the consultation period overlapping the period for Purdah.



## 7. Making Representations & GDPR

- 7.1 The introduction of the General Data Protection Regulation (GDPR) in May 2018 established a clear expectation that a valid lawful basis is demonstrated in order to process personal data. In regards to submitting representations this means any data that identifies an individual, for example name and address data, email, or potentially the content of their representation. This includes the identification of individuals representing organisations.
- 7.2 Personal data processed by the Council through the submission of representations is considered to meet the lawful basis of:
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- 7.3 Where specific consent is obtained:
- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- 7.4 Any data processed should be necessary, meaning that if the Council can reasonably achieve the same purpose without the processing, then there is no lawful basis.
- 7.5 The Representations Form will include a relevant data protection and privacy policy statement setting out how personal data will be processed.

## 8 Recommendation

- **That the Working Party recommend to Cabinet to agree the Communications & Engagement Plan as the basis for conducting public consultation on the First Draft Local Plan (Part 1), Supplementary Planning Documents (SPDs), and supporting documents.**
- **To delegate final decisions as to which promotional tasks and events are carried out to the Planning Policy Manager.**

## 9 Legal Implications and Risks

- 9.1 The Local Planning Regulations do not require consultation at this stage of the Local Plan process (the consultation in relation to SPDs is a requirement). However, a meaningful and well promoted early engagement plan strengthens the Council's ability to demonstrate compliance with the NPPF and any other related conformity tests at the examination stage. The Council is keen to hear views from the public and business sectors in order to help shape a robust Final Local Plan for independent examination.
- 9.2 A recent presentation by the Consultation Institute highlighted examples where Local Planning Authorities (LPA's) have been ruled against in High Court Appeals. The Institute's main message was that following the Regulations is not always enough and there are High Court case law examples where LPA's have been found to have not consulted adequately. The key points are that in undertaking consultation the Council should demonstrably:
- Be open to influence (evidenced by post-consultation reports including officer comments)
  - Give sufficient information (evidenced by implementing a communications and engagement programme and through the content of consultation documents)
  - Give sufficient time (evidenced by meeting the regulations and SCI minimum time requirements)

- Demonstrate conscious consideration (evidenced by post-consultation reports including officer comments)
- Must demonstrate alternatives to a proposal (evidenced by the 'Alternatives Considered' document).

9.3 The above considerations are based on the 'Gunning Principles' which apply to all UK public consultations and this communications and engagement plan is designed to help mitigate the risks of Local Plan delay due to a failure in the above points.

9.4 Once the promotional tasks in this plan have been initiated there is a risk of reputational damage should the Council delay or abandon the consultation.

## **10 Financial Implications and Risks**

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

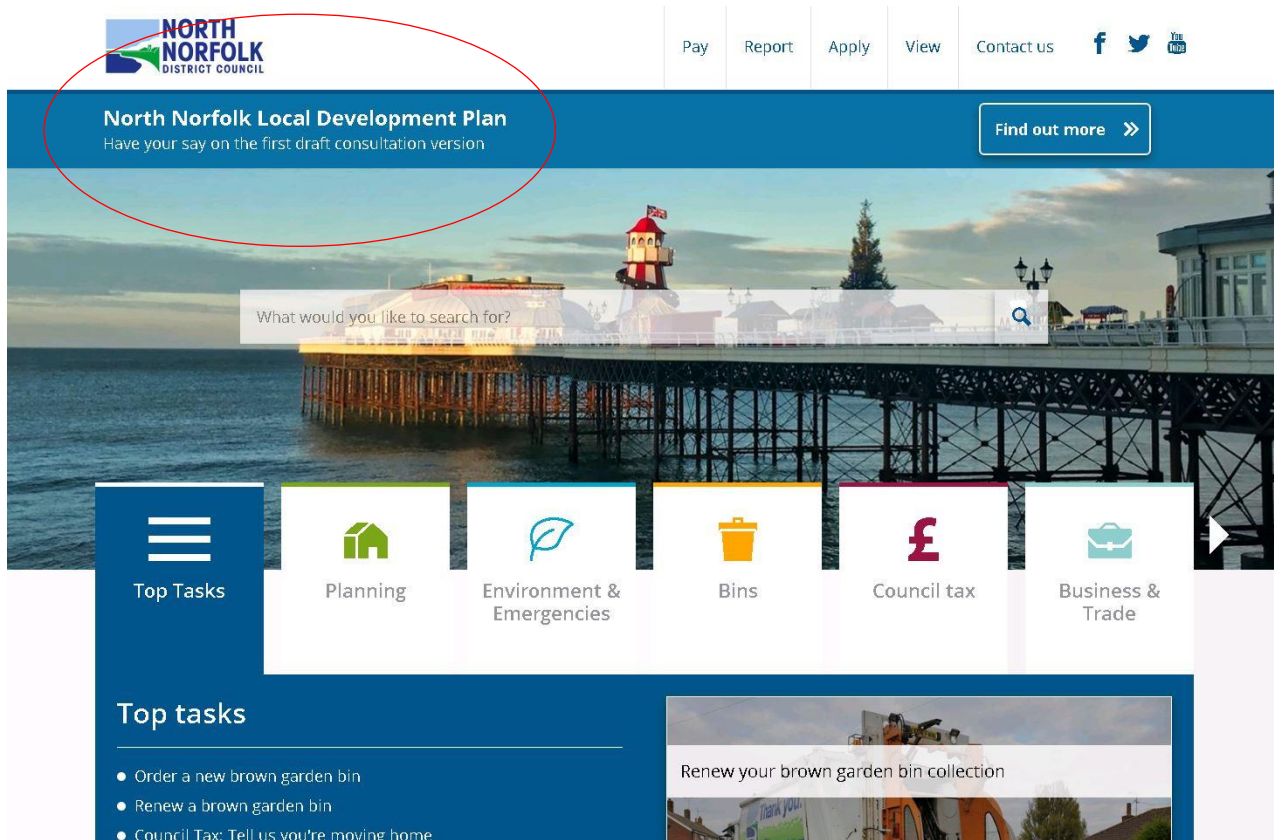
## Appendix 1

### Engagement Undertaken During Local Plan Review

Consultation / Engagement Exercise	When?	Purpose	Who attended / was consulted?
Local Plan Launch Events x 2	Sept 2015	Launch of Local Plan and to highlight consultation on Regulation 18 and SCI.	Parish & Town Councils
Regulation 18 Consultation	7 Aug - 9 Oct	To notify specific and general consultees of our intention to prepare a Local Plan and to invite representations as to which subjects the Local Plan should address.	Public
Draft Statement of Community Involvement Consultation	7 Aug - 9 Oct	To receive comments on the Draft Statement of Community Involvement.	Public
Newsletter 1	7 Aug	To notify of the Local Plan Launch Events and Regulation 18 and Draft SCI consultations.	Consultee Database + Publically available
<b>2016</b>			
Call for Sites Consultation	16 Jan to 31 May	To receive site proposals for consideration through the Local Plan.	Public
Newsletter 2	16 Jan	To notify the wider public of the opportunity to submit site proposals for consideration through the Local Plan.	Consultee Database + Publically available
HELAA Methodology Consultation	21 Mar – 3 May	To receive comments on the proposed HELAA methodology which will be used by all LPAs in Norfolk when preparing their Housing & Economic Land Availability Assessments. NNDC hosted the consultation.	Various Agents, Developers, Landowners, Individuals, Parish & Town Councils + Statutory Consultees
Town Workshops x 8	May / June	To raise awareness of the Local Plan review in the main settlements, discuss early scenarios around the location and quantity of future development, to identify issues and opportunities, and a vision for those areas, and to enable general discussion.	Town Councils + Hoveton Parish Council
Newsletter 3	9 Sept	To provide a local plan recap, detail the site assessment process and evidence required to support the Plan, and, to provide information on the Sustainability Appraisal and Scoping Report.	Consultee Database + Publically available
Green Build Local Plan Exhibition	10-11 Sept	To provide a visual display of current information on the Local Plan, to raise the profile, and to answer questions from the public. Further distribution of Local Plan Newsletter.	Public
Draft Sustainability Appraisal Scoping Report Consultation	10 Oct- 21 Nov	To receive comments on the Draft Sustainability Appraisal Scoping Report	Public
<b>2017</b>			
Local Green Space Consultation	4 July – 11 Aug	To seek nominations by Parish & Town Councils for Local Green Space designation.	Parish & Town Councils
Site Promoter Letter 1 - Further Evidence	20 July – 29 Sept	To invite submissions of further evidence in support of sites proposed for development through the Local Plan.	Agents, Developers, Landowners
Newsletter 4	6 Sept	To update on potential development sites, evidence gathering, SHMA, review of Open Space & Local Green Space, Neighbourhood Planning update, and,	Consultee Database + Publically available

		Norfolk Strategic Framework consultation.	
Green Build Local Plan Exhibition	9-10 Sept	To provide a visual display of current information on the Local Plan, to raise the profile, and to answer questions from the public. Further distribution of Local Plan Newsletter.	Public
Site Promoter Letter 2	3 Nov	To provide an update on the site assessment process, the likely scale of and location of sites, and that the next opportunity to submit sites will be through the First Draft Local Plan consultation.	Agents, Developers, Landowners
<b>2018</b>			
Protecting Our Green Spaces Letter	21 June	To update and thank Parish & Town Councils for nominating proposed Local Green Spaces and to summarise the published Amenity Green Space Topic Paper and next steps regarding the policy approach for Open Spaces.	Parish & Town Councils
Newsletter 5	22 June	To update on revised LP timeline, strategic direction of the Plan, housing target, preferred residential sites, national policy changes, evidence base update including SFRA, consultation on the Corpusty & Saxthorpe Neighbourhood Plan, brownfield land register + five year housing land supply position.	Consultee Database + Publically available
Green Build Local Plan Exhibition	8-9 Sept	To provide a visual display of current information on the Local Plan, to raise the profile, and to answer questions from the public.	Public
Local Plan Viability Workshop	29 Aug	To provide the opportunity for representatives of the development industry to review and input into the emerging findings of the Local Plan Viability Study.	Agents, Developers, Landowners, Housing Associations
Parish & Town Council Events x 2	Oct / Nov	To provide a briefing on the emerging Local Plan content including housing strategy, distribution of growth, affordability, development viability, housing construction standards and to exhibit emerging development sites. The events included a drop-in clinic with officers prior to the briefing and a Q&A session afterwards.	Parish & Town Councils

## Appendix 2 NNDC Website Mock-up for Local Plan Consultation



## **Appendix 3**

### List of Consultation Documents

#### **Main Consultation documents**

- First Draft Local Plan Part 1
- First Draft Local Plan Part 1 - Alternatives Considered
- Interim Sustainability Appraisal, including interim SA Scope
- Habitats Regulation Assessment + HRA Scoping Report
- Draft Landscape Character Assessment SPD
- Draft Landscape Sensitivity Assessment (Renewable Energy) SPD
- Draft North Norfolk Design Guide SPD
- Consultation Statement

#### **Background Papers**

- Approach to the setting of the Housing Target
- Housing Background Paper: Distribution of Growth
- Approach to Employment
- Infrastructure Position Statement
- Draft Green Infrastructure Strategy
- Site Assessment Methodology
- Optional Technical Standards

#### **Evidence Studies**

- Plan Wide Viability Study
- Retail and Main Town Centre Study
- Strategic Flood Risk Assessment
- Norfolk Strategic Planning Framework
- Amenity Green Space Study
- Business growth and investment Opportunities Study
- Strategic Housing Market Assessment
- Housing and Economic Land Availability Assessment, Part 1 & 2
- Visitor Impact on European Protected Sites
- Norfolk Caravans and Houseboats Accommodation Need Assessment

## Appendix Pack Local Plan Working Party January 2019

### Approach to Design

#### Design Policy 1: High Quality Design

##### **Policy xx High Quality Design**

All development proposals should seek to make efficient use of land, but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. All development proposals should respond to current best practice and demonstrate that they are in general conformity with the design principles set out in established urban design guidance, any subsequently produced design Supplementary Planning Document adopted by the Council or other design guidance endorsed by the Council and/or through neighbourhood planning.

All new major development will be required to submit a Design and Access Statement. Where considered appropriate for the scheme to come forward and subject to viability, the Council may request the involvement of a developer funded Design Review.

The Council will expect proposals for all development and other works to comply with the North Norfolk Design Guide, and successor documents, or provide justification for a departure from the guidance demonstrating a high quality of design that:

##### **Quality of the Public Realm**

1. Contributes positively to the public realm and public spaces; creating high quality, sustainably designed places and spaces that maximise uses and activities;

##### **Landscape and Green Infrastructure**

2. retains existing important landscaping and natural features, in accordance with Policy x , and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and ecological network mapping;
3. provides opportunities to enhance the green infrastructure network across the District in accordance with policy x

##### **Movement and Connectivity**

4. maximises connectivity, creating a movement hierarchy which is legible, permeable and well connected;
5. incorporates footpaths, cyclepaths, green links and networks to the surrounding area, respecting important approach routes;

##### **Character**

6. preserves or, where possible, enhances the special character of the historic environment in accordance with Policy X and, where up-to-date, Conservation Area Appraisals;
7. integrates, to a high degree of compatibility with the surrounding area, in terms of: layout, form, style, massing, scale and density, ensuring that development makes efficient use of land while respecting the distinctive local character;

##### **Safety**

8. reduces opportunities for crime, terrorism and antisocial behaviour, creating safe, secure and accessible environments;

**Amenity**

9. provides appropriate private amenity space, and, where appropriate, includes facilities for refuse, recycling and servicing, whilst respecting residential amenity of both new dwellings and nearby occupiers in accordance with Policy X;

**Adaptability and Efficiency**

10. ensures that development is designed in accordance with the Council's Optional Technical Housing Standards as set out in Policy x;  
 11. incorporates sustainable construction principles contained within policy X  
 12. maximises the opportunities for the use of Sustainable Urban Drainage Systems (SuDs) as detailed within Policy X [Permeable paving];

**Public Art**

13. incorporates public art into schemes; and

**Parking**

14. provides adequate parking provision that is discreet and accessible in line with Policy X.

Preferred Option	Why it is Preferred
Introduce a North Norfolk specific design policy setting out local design standards.	The Council's preferred approach is a North Norfolk specific design policy setting out high quality local design standards that all proposals should have regard to. Further to this, and In line with Paragraph 130 of the NPPF, the Council is currently producing a Design Guide Supplementary Planning Document (SPD). A specific North Norfolk Design Policy allows for reference to be made to the Design Guide. The result of this will be that the Council can ensure that new development is of a high quality design, achieving many of the essential wider aims and objectives under the umbrella of achieving sustainable development.
Alternative Option	Why it is not Preferred
Have no policy within the Local Plan	This option would not allow the Council to deliver development that is of a high quality design in line with the NPPF and its vision and expectations. Furthermore, having no policy within the plan reduces the ability to refer to the emerging North Norfolk Design Guide SPD. The result of not having a policy within the plan will lead to the potential that development of poor quality design with no regard to local design standards, character and local community aspirations.



## Design Policy 2: Protection of Amenity

### Policy xx Protection of Amenity

For all new development, consideration will need to be given to general amenity impact issues, especially living conditions. Development will not be permitted which causes unacceptable effects on the residential amenity of neighbouring occupants, or does not provide for adequate levels of amenity for future occupants. In assessing the impact of development on the living conditions of occupants, regard will be had to the North Norfolk Design Guide and the following considerations:

1. The provision of adequate areas of useable and secluded private amenity space for the occupiers of proposed dwellings, in keeping with the character of the immediate surrounding area;
2. the protection of adequate areas of useable and secluded private amenity space for the occupiers of existing dwellings, in keeping with the character of the immediate surrounding area;
3. overlooking of windows of habitable rooms and private amenity space;
4. overbearing impact/visual dominance;
5. overshadowing of private amenity space;
6. loss of daylight and/or sunlight to existing windows of habitable rooms;
7. odour, noise, vibration or other forms of nuisance such as artificial light pollution, insects and vermin; and
8. other forms of pollution (including, but not limited to: contaminated land, dust, air and light pollution).

Preferred Option	Why it is Preferred
Introduce a new policy to protect amenity for all residents in the District.	The preferred approach seeks to ensure that all residents benefit from a high standard of amenity. This approach will lead to development having greater respect for amenity of existing residents and residents of new development, with positive impacts upon quality of life and well-being.
Alternative Option	Why it is not Preferred
Do not have a policy on the protection of amenity.	This option would not allow the Council to apply high standards in regards to the amenity of residents. This could lead to developments of poor quality design, leading to poorer living conditions for residents of the District, with negative impacts on the quality of life and well-being.

## Approach to Retail and Town Centres

### Policy XX Approach to Retail and Town Centres

Support will be given for maintaining and enhancing the vitality and viability of the following hierarchy of town centre and local centres:

Cromer, Fakenham & North Walsham	Large Town Centre - serves the District and beyond and the main focus for retail and leisure development
Holt, Sheringham, Hoveton, Stalham and Wells-next-the Sea	Medium Town Centres & Tourist Centre – provide a range of services for local residents, their rural Hinterland and tourists
Local Service Centres	Local Centres – provide for basic or everyday local needs and for their immediate rural catchment.

- Proposals for retail and other town centre development of a scale appropriate to these roles and in sustainable locations will be supported in each Large, Small growth town and identified Service Villages, provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its existing retail function.
- Support will be given for convenience and comparison goods provision, of an appropriate scale, which aids the vitality and viability of Cromer, Fakenham and North Walsham town centre. Support will also be dependent on how proposals reflect the identified capacity to support growth as established in the Retail & Town Centre Study and other appropriate evidence and seeks to enhance and broaden the retail offer.
- Site selection for retail and other town centre uses should follow national policies and guidance. Town centre boundaries & primary retail areas are shown on the policies map.
- Development proposals for retail development, which are located between the Primary Shopping Area (PSA) and the Town Centre Boundary will be supported where it is demonstrated that the proposal cannot be suitably accommodated within the PSA and will bring positive economic regeneration benefits.
- Support for out of centre development will be dependent on how it reflects the capacity available to support the proposal as identified in the retail study and subsequent permissions, how it seeks to enhance expenditure retention and in relation to the assessment of impacts on the town centre in accordance with the locally derived impact thresholds below

Cromer & Fakenham	1,000sq.m gross and over
North Walsham, Sheringham Holt & Hoveton	500 sq.m gross and over
Stalham, Wells-next –the sea	250 sq.m and over

- Proposals in Hoveton will be considered in the context of the entire town centre and the policies of the relevant Broads Authority Development Plan so that retail and main town centre uses proposals address the town centre in its entirety.
- Proposals for residential development within town centre locations will be considered

favourably provided that they are above ground floor level. Such proposals should include a separate and secure access, preferably to the rear of the property, which do not result in a net loss of ground floor retail space.

- Proposals are expected to contribute positively and respect their surroundings, contribute to the visual amenity of their locality and provide public realm improvements to the area and wider surroundings such as demonstrate:
  - Enhanced accessibility and connection between urban spaces and;
  - Improvements to streetscape, lighting, signage, paving and street furniture;
  - Improvements to the pedestrian and cycle environment.
  - complementary surfacing and hard landscaping materials
  - Incorporate tree planting and green infrastructure, wherever possible
- Support will be given to innovative design and improvements in local design quality which help to develop a strong local identity and sense of place

Outside town centres, in villages and rural community's proposals for the conversion or extension of shops that are designed to improve their viability will be supported in principle

In the designated countryside proposals for small scale specialist retail services will be supported in principle only where it can be demonstrated that the proposal is to perform a wholly ancillary role to an existing or planned use and is of an appropriate and proportionate small scale. \*

\*please note there is the potential to remove and place in approach to rural policy

<b>Preferred Option- Retail and Town Centres</b>	<b>Why it is Preferred</b>
Adopt a new policy applied to all eight main town centres, which identifies key criteria and retains the focus for investment on town centres, including a locally derived impact threshold. This option could have a positive impact on vitality and viability of town centres, improving access to services, conserve land for development and improve the quality of the build environment and public realm.	This option would enable the Council to adopt a policy that reflects local circumstances, ensuring decisions are made in terms of the local rather than a national context. The approach will help to provide greater transparency regarding decision making process.
<b>Alternative option</b>	<b>Why this is not Preferred</b>
No real alternatives have been identified to the above approach's, other than not to have a policy that supports the town centre vitality and viability and instead to rely on the NPPF.	This option would not set out a positive strategy to the management of retail and town centres nor enable decisions to be informed by current local circumstances based on local evidence. Uncertainty would arise if the Council were to rely on the NPPF with regard to retail impact assessments thresholds.

## Provision and Retention of Local Facilities

### Policy xx Provision and Retention of Local Facilities and Services

New or improved community facilities or services will be permitted within the settlement hierarchy, or within the Countryside where they meet the identified needs of the local community.

Development proposals that would result in the loss of sites or premises currently, or last used for, important local facilities and services <sup>1</sup>will not be permitted unless:

- alternative provision of equivalent or better quality is available in the area or will be provided and made available prior to commencement of redevelopment; or
- it can be demonstrated that there is no reasonable prospect of retention at its current site; and if it is a commercial operation, that a viability test has demonstrated that the use is no longer viable and that all reasonable efforts have been made to sell or let the property at a realistic market price <sup>2</sup> for a period of at least 12 months.

Proposals on designated Health Care and social care Campuses that would otherwise accord with Development Plan policies but would result in the loss of health care facilities will not be permitted unless a replacement facility of equal or greater community benefit is provided for that immediate locality and made available prior to the commencement of development.

Additional healthcare and residential care enhancements proposals outside of development boundaries will be supported as long as:

- the scheme is of a scale and style appropriate to its immediate surroundings
- the scheme demonstrates good design that is sympathetic to the local area

an element of open market housing may be allowed, subject to:

- clear evidence on viability
- It can demonstrate that the additional revenue created by the development of open market housing is essential to enable the delivery of the care facility on site on the site or
- the amount of open market housing is the minimum required to achieve site viability and remains significantly less than the level of specialist housing proposed.

Please note there is the potential to move the health section to housing section in the countryside –and or cross reference.

Preferred Option – Provision and Retention of Local Facilities	Why it is Preferred
Adopt a new policy with amended/updated criteria and guidance resulting in the replacement of existing Core Strategy policy CT 3.	This option would take the opportunity to review and update the existing approach into a single policy reflecting current evidence and circumstances and allow for greater transparency regarding

<sup>1</sup> Important local facilities and services include a primary school, convenience store, bank, post office, public house, petrol filling station, public hall or indoor sports facility, theatres and cinemas and other cultural facilities and small scale health care facility where the facility is within the Countryside or is the last of its kind within a selected settlement in the settlement hierarchy

<sup>2</sup> Demonstrated as commercial market price by local valuer to the satisfaction of the Council

	decision making process.
<b>Alternative Option</b>	<b>Why this is not Preferred</b>
No real alternatives have been identified to the above approach's, other than not to have a policy that supports the provision and retention of local facilities and instead rely on a combination of NPPF and other policies in the Local Plan.	This option may not enable decisions to be informed by current local circumstances based on local evidence. Uncertainty will arise if we continue to rely on the NPPF.

## Advertising and Shop Fronts

### Policy xx Advertisements and Shopfronts

Advertisements and signs (illuminated & non- illuminated) should be appropriate and relevant to the business or premises for which it has been created and be sensitively designed and located having regard to the character of the building on which they are to be displayed and/or the general characteristics of the locality. The size scale, material, colour scheme and any means of illumination selected should be appropriate to the local area and in areas of historic value, such as conservation areas, particular regard should be had to any impact of the proposal on the character and appearance of the area. Proposals which obscure features of architecture or historical interest, or are uncharacteristic of a buildings design, will not be permitted.

The creation of new shopfronts, or the replacement / alteration of an existing frontage should be well designed to reflect the character of the surrounding area and seek, where possible, to enhance the visual amenity of the local area. Proposals should have regard to:

- The existing character of the area;
- The suitability of the overall form, scale and architectural detail in relation to the overall appearance of the building;
- The suitability of materials in relation to the overall appearance of the building

Proposals for advertisements and shopfronts should have regard to the guidance contained in the NNDC Design Guide SPD.

<b>Preferred Policy - Advertising and Shop Fronts</b>	<b>Why it is Preferred</b>
Adopt a new policy with criteria and guidance.	This option would bring the current policy framework up to date and create a clear decision making framework. that is easily understood. It could have positive impacts on landscape character, and protect the quality of the built environment against inappropriate advertisements and signs. It would help strike an appropriate balance between protecting the character of places and

	maintaining an attractive environment whilst permitting high quality signage and shop frontages to ensure appropriate promotion of local businesses and towns.
<b>Alternative Option</b>	<b>Why is this not Preferred</b>
Rely only on national policy and guidance.	This option would not allow for a locally tailored approach. Relying on national policy would not provide the clarity needed to offer sufficient protection to North Norfolk's landscapes and build environment.

## Approach to Renewable Energy

### Policy xx Renewable energy

Renewable energy proposals will be supported and considered in the context of sustainable development and climate change, taking account of the wide environmental, social and economic benefits of renewable energy gain and their contribution to overcoming energy supply problems in parts of the District.

Proposals for renewable energy technology, associated infrastructure and integration of renewable technology on existing or proposed structures will be permitted where individually, or cumulatively, there are no significant adverse effects on;

- I. the surrounding landscape, townscape and cumulative landscape character and visual impacts; and
- II. the special qualities of all nationally important landscape, heritage assets, including their settings are conserved or enhanced; and
- III. residential amenity (noise, fumes, odour, traffic, broadcast interference); and
- IV. specific highway safety, designated nature conservation, best and most versatile agricultural land or biodiversity considerations.

And in the case of proposals for wind energy development;

- o Turbines will be considered suitable where they lie outside an area classified as having high sensitivity within the LSS, 2018 study and;

There are no significant adverse effects on;

- I. Air traffic safety, radar, reflected light, heritage, cumulative impact and radar and telecommunications have been adequately mitigated; and
- II. residential amenity in terms of shadow flicker, vibration and visual dominance; and
- III. it can be demonstrated that the impact on landscape character is acceptable in accordance with the adopted landscape character evidence base.

When dealing with planning application for wind turbines it should be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal should have their backing.

Community-led initiatives for renewable and low carbon energy will be supported where they are being taken forward through neighbourhood planning.

Preferred Option	Why it is Preferred
Introduce a new policy for renewable energy development.	This option will provide a positive strategy to promote renewable energy, which complies with the NPPF and helps to increase the use and supply of renewable and low carbon energy and heat.
Alternative Option	Why it is not Preferred
Devolve the identification of suitable areas for onshore wind to neighbourhood planning groups	This option would represent a missed opportunity to provide a positive strategy to promote renewable energy to address the District as a whole. There is currently a small take up of neighbourhood plans and therefore would provide limited wind energy

	opportunities.
Remove references to onshore wind development from policy, and assess future wind applications against national policy	This option would represent a missed opportunity to have a local policy that fully reflects the NPPF and Government strategy. This option would not positively provide for renewable energy development across the District.



## Approach to the Environment

### **Policy XX Norfolk Coast Area of Outstanding Natural Beauty and The Broads National Park**

The impact of individual proposals, and their cumulative effect, on the identified special qualities of the **Norfolk Coast AONB, The Broads National Park** and their settings, will be carefully assessed.

Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced. When assessing development proposals within these designated areas, particular attention will be given to the objectives and principles set out in the Norfolk Coast AONB Management Plan 2014-2019 and the Broads Plan 2017 and any successor documents.

Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.

Proposals for ‘major development’<sup>1</sup> in the Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as set out in national policy<sup>2</sup>.

1. ‘major development’ in this instance is not specifically defined and is a matter for the decision maker, taking into account its nature, scale and setting and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined; NPPF para. 172, footnote 55

2. This does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated elsewhere outside the AONB was assessed during plan preparation.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
Provide a policy to ensure appropriate protection is given to the conservation and enhancement of the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty and The Broads National Park.	This option will accord with the NPPF by providing a positive strategy and ensuring great weight is given to the conservation and enhancement of the District’s national landscape designations.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to provide a policy and to instead rely on National policy and guidance.	This option would not comply with the NPPF requirement for local plans to set out a positive strategy and would not allow for the principles and objectives of the specific areas’ management plans to be given appropriate weight in the decision making process.

### **Policy XX Protection and Enhancement of Landscape and Settlement Character**

Proposals for development should be informed by, and be sympathetic to, the distinctive Landscape Types and Character Areas, strategic objectives and considerations identified in the North Norfolk Landscape Character Assessment and Landscape Sensitivity Assessment and features identified in relevant settlement character studies.

Development proposals should, where appropriate, demonstrate that their location, scale,

design and materials will protect, conserve and, where possible, enhance:

- the special qualities and local distinctiveness of the area (including its historical, biodiversity and cultural character)
- gaps between settlements, and their landscape settings
- distinctive settlement character
- the pattern of distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife
- visually sensitive skylines, hillsides, seascapes, valley sides and geological features
- nocturnal character
- the setting of, and views from, **Conservation Areas** and **Historic Parks and Gardens**.
- the defined **Setting of Sheringham Park**, as shown on the Policies Map.

Development should, where possible, be directed to areas where the landscape is either not sensitive to change, or is of a lower landscape sensitivity. Where development is proposed in areas of higher landscape sensitivity, applications will be expected to demonstrate how the impact on the landscape will be minimised by appropriate mitigation. In the case that a development is not able to be made acceptable by mitigation measures, such proposals will be refused.

Proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and Public Rights of Way network in accordance with Policies XX & XX.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
To provide a policy to ensure protection of the distinctive landscape character, qualities and sensitivities of the area.	This option will accord with the NPPF requirement that planning policies protect and enhance valued landscapes commensurate with their quality as identified in the development plan.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to provide a policy and to instead rely on National policy and guidance.	This option does not comply with the NPPF. It would represent a missed opportunity to ensure that development proposals reflect the distinctive character, qualities and sensitivities of the area.

### **Policy XX Biodiversity and Geology**

All development proposals should:

- protect the biodiversity value of land and buildings and minimise fragmentation of habitats;
- maximise opportunities for restoration, enhancement and connection of natural habitats; and
- incorporate beneficial biodiversity conservation features where appropriate.
- 

Biodiversity net gains and contribution to ecological networks should be sought for all development, proportionate to the scale of the proposal and any potential impacts. A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible.

The highest level of protection will be given to European Sites, with development only permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 or any successor Regulations. Where measures to mitigate for potential adverse effects on European sites are required, the proposed mitigation measures must be justified as fit for purpose with appropriate evidence, to inform the Council's Habitats Regulations Assessment.

Development proposals likely to have a direct or indirect adverse effect to nationally designated sites<sup>1</sup> or other designated areas<sup>2</sup> or protected species<sup>3</sup> will not be permitted unless;

- it can be clearly demonstrated that the benefits of the development outweigh the need to safeguard the special ecological / geological interest of the site and the wider network of natural habitats; and
- it has been demonstrated, where development would result in significant harm, that it cannot be reasonably located on an alternative site that would result in less or no harm, and;
- the remaining harm, after all measures to prevent and adequately mitigate for have been applied, will be adequately compensated for.

Development proposals that would result in **significant detriment** to the nature conservation interests of nationally designated sites will not be permitted.

Development proposals where the principal objective is to conserve or enhance biodiversity or geodiversity interests will be supported in principle.

Where the Council considers that a designated site, protected species, or any species or habitat, particularly where listed as a Priority Habitat or Species under Section 41 of the Natural Environment and Rural Communities Act (2006), of principal importance for conservation may be adversely affected by a development proposal, an Ecological Environmental Impact Assessment (EclA) (or in certain circumstances<sup>4</sup> a Preliminary Ecological Appraisal (PEA)) will be required to be submitted with the planning application to assess effects on European sites and effects on flora and fauna, commensurate with the scale of the impact and the importance of the species.

1. SSSIs, The Broads, the Norfolk Coast AONB & National Nature Reserves

2. Regionally Important Geological Sites, Local Nature Reserves, County Wildlife Sites, Ancient Woodland and Roadside Nature Reserves.

3. Those identified in the Natural Environment and Rural Communities Act 2006 Section 40 and in the UK and Norfolk Biodiversity Action Plans.

4. Applications may be supported by a Preliminary Ecological Appraisal (PEA) only when the results of the PEA clearly indicate that further survey and assessment is not required; a non-technical summary is provided of the net losses and gains for biodiversity of the development; the PEA has provided clarity and certainty regarding the ecological impacts of the development and the Local Planning Authority has sufficient information in order to make a decision in accordance with BS42020:2013.

Preferred Option	Why it is Preferred
To provide a policy to protect and enhance biodiversity and geodiversity.	This option will accord with the NPPF requirements for the protection and enhancement of biodiversity and geodiversity, will assist the Council in their statutory duty to have regard to the purpose of conserving biodiversity and will align with the Government's stated ambition for development to deliver a biodiversity net gain.
Alternative Option	Why it is not Preferred

Not to provide a policy and to instead rely on National policy and guidance.	This option does not comply with the NPPF and would represent a missed opportunity to embed the principle of environmental net gain into development.
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**Policy XX Trees and Hedgerows**

Development requiring the loss of a protected tree or hedgerow (including preserved trees, protected hedgerows, trees in Conservation Areas, ancient trees, aged and veteran trees and trees classified as being of categories A or B in value (BS5837:2012) will only be permitted where it would allow for a substantially improved overall approach to the design and landscaping of the development where the public benefit would clearly outweigh the loss or deterioration of any tree or hedgerow.

Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species will be required. Where the loss of a tree is accepted in these circumstances, developers will be required to ensure that the loss will be suitably compensated for, taking into account the size and condition of the tree.

Where a proposed development retains existing trees and hedgerows on-site, or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
To introduce a new policy to provide specific protection for trees and hedgerows.	This option will accord with the NPPF and will ensure that the preference will be for existing natural features to be incorporated into development schemes rather than being lost.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to introduce a policy and to instead rely on other policies in the local plan, legislation and National policy and guidance.	This option would result in reliance on other policies in the plan and statutory protections to protect these important natural features. This would be a missed opportunity to require developers to demonstrate why a loss of natural features is necessary for their proposal and to set out what the Council consider would be adequate replacement provision where loss is demonstrated to be unavoidable.

## **Policy XX Protecting and Enhancing the Historic Environment**

The Council will protect, conserve and, where possible, enhance heritage assets throughout the District through the special protection afforded to listed buildings, conservation areas, and scheduled monuments and through careful control of development that might adversely affect non-scheduled, nationally important archaeological remains; other areas of archaeological potential or importance; historic features and their settings; non-designated heritage assets; and areas of historic landscape or parkland (including, but not limited to, those on the Historic England Register of Parks and Gardens of Special Historic Interest).

The Council will protect, conserve and, where possible, enhance the North Norfolk historic environment by:

- (a) conserving the historic dimension of the landscape;
- (b) conserving cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;
- (c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and
- (d) increasing opportunities for access, education and appreciation of all aspects of the historic environment, for all sections of the community.

Development proposals, including alterations and extensions, that result in substantial harm to or total loss of significance of a designated heritage asset and / or its setting will only be permitted in exceptional circumstances where it is demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Where a development proposal will lead to less than substantial harm this harm should be weighed against the public benefits of the proposal.

Development proposals that would affect the significance of a designated or non-designated heritage asset and / or its setting, or any known or possible archaeological sites, will be required to provide, in the form of a heritage statement, sufficient information proportionate to the importance of the asset and the impact of the proposed development, to enable any impact to be accurately assessed.

In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset, in the first instance, unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through character appraisals, the Council will, as part of any development proposal, seek the removal of the features that undermine the historic environment. The re-use of Listed Buildings and buildings identified on the Local List will be encouraged and the optimum viable use that is compatible with the fabric, interior and setting of the building will be permitted.

The character and appearance of Conservation Areas will be conserved, and where possible enhanced, and, in consultation with all relevant stakeholders, a further programme of conservation area appraisals and management plans will be undertaken and used in the determination of development proposals.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
To introduce a policy that ensures a positive approach to the conservation and enhancement of the historic environment.	This option complies with the NPPF and will ensure that the Council assesses proposals affecting heritage assets in a manner

	commensurate with the type of asset involved and the level of harm that would result.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to provide a policy and to instead rely on National policy and guidance.	This option would not comply with the NPPF and would result in difficulty ensuring conservation and enhancement of the District's historic environment.

**Policy XX Pollution and Hazard Prevention and Minimisation**

All development proposals should minimise, and where possible reduce, all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in water quality. Proposals will only be permitted where, individually or cumulatively, there are no unacceptable impacts on;

- the natural environment and general amenity;
- health and safety of the public;
- nocturnal character;
- air quality;
- surface and groundwater quality;
- land quality and condition; and
- the need for compliance with statutory environmental quality standards

Exceptions will only be made where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development outweigh the adverse impact.

Proposals for development should protect and enhance the tranquillity and dark skies of North Norfolk and the adjoining Authorities' areas.

Development proposals on contaminated land (or where there is reason to suspect contamination) must include an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where the land is, or is made, suitable for the proposed use.

Development that increases the risk to life or property, except for that which is necessary to the operation of the use causing the hazard, will not be permitted in:

- **Major Hazard Zones**<sup>1</sup>; and
- in the vicinity of existing developments that require particular conditions for their operation or that are authorised or licensed under pollution control or hazardous substances legislation (including hazardous pipelines) where new development would be likely to impose significant restrictions on the activities of the existing use in the future.

1. As identified by the Health and Safety Executive

<b>Preferred Option</b>	<b>Why it is Preferred</b>
To provide a policy to minimise and where possible reduce, all emissions and other forms of pollution including light and noise pollution and ensure no deterioration in water	This option complies with the NPPF and will ensure that all types of pollution are given due weight in the determination of development proposals.

quality.	
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to provide a policy and to instead rely on National policy and guidance.	This option would not comply with the NPPF and would result in difficulty ensuring that development proposals minimise pollution of the environment.

## Approach to Coastal Management

### Policy XX The Undeveloped Coast

In the Undeveloped Coast only development that can be demonstrated to require a coastal location and that will not be significantly detrimental to the open coastal character will be permitted.

Community facilities, commercial, business and residential development that is considered important to the social and economic well-being of the coastal community will be permitted where it replaces that which is threatened by coastal erosion.

Preferred Option	Why it is Preferred
Introduce a policy to protect the undeveloped character and appeal of the North Norfolk coast.	This option will accord with Government policy and will provide protection against the wider impact of general development, additional transport and light pollution on the distinctive coastal area.
Alternative Option	Why it is not Preferred
Do not have an undeveloped coast designation.	There would be no specific policy protection for the undeveloped coast. The character and appeal of the coastal area could be eroded.



## Policy XX Coastal Erosion

Within the **Coastal Change Management Area**, (as defined on the Policies Map) proposals for new residential development, including conversion of existing buildings, will not be permitted. For other uses, planning permission will be granted for development proposals subject to:

1. It being demonstrated through a **Coastal Erosion Vulnerability Assessment** that the proposal will not result in an increased risk to life, or a significant increased risk to property; and,
2. Where it can be demonstrated that the works are consistent with the relevant Shoreline Management Plan and there will be no material adverse impact on the environment or elsewhere along coast; and,
3. The proposal comprises essential infrastructure including coast protection schemes; or,
4. Proposals for temporary permission, directly related to the coast, of a temporary or impermanent nature together with, as appropriate, a legal agreement to secure the long term management potentially including the eventual demolition and removal of the development; or
5. Commercial, leisure or community infrastructure proposals providing substantial economic, social and environmental benefits to the community.

In any location, development proposals that are likely to increase coastal erosion as a result of changes in surface water run-off will not be permitted.

New development, or the intensification of existing development in a coastal location, but outside the Coastal Change Management Area, will need to demonstrate that the long-term implications of coastal change on the development have been addressed.

Preferred Option	Why it is Preferred
<p>Introduce a policy to reduce the risk from coastal change.</p>	<p>This option would comply with the NPPF; make clear what development will be appropriate in the risk area, it would introduce a positive approach to development that may have a social or economic benefit to affected coastal communities and the introduction of a requirement for applications to be accompanied by a Coastal Erosion Vulnerability Assessment will ensure an applicant is fully aware of the risks of coastal change and this will be addressed in an application. In addition, this option will ensure new development is future-proofed for the impact of coastal change.</p>

<b>Alternative Option 1</b>	<b>Why it is not Preferred</b>
<p>Introduce a policy to reduce the risk from coastal change.</p> <p>"In the Coastal Change Management Area new development, or the intensification of existing development or land uses, will not be permitted, except where it can be demonstrated that it will result in no increased risk to life or significant increase in risk to property.</p> <p>In any location, development proposals that are likely to increase coastal erosion as a result of changes in surface water run-off will not be permitted."</p>	<p>This option is considered less positive than the preferred option and does not address the perceived blight to coastal communities. This option does not give consideration of coastal change on development which may be affected by such change but is located outside a designated Coastal Change Management Area.</p>
<b>Alternative Option 2</b>	<b>Why it is not Preferred</b>
<p>Not to introduce a policy and instead rely on National policy and guidance.</p>	<p>This option would not comply with the NPPF and could result in inappropriate development being introduced that could result in an increased risk to life and property and could exacerbate coastal change.</p>

### **Policy XX Coastal Adaptation**

Proposals for the relocation and replacement of community facilities, commercial, agricultural and business uses affected by coastal erosion will be permitted in the Countryside, provided that:

- the proposed development replaces that which is in the Coastal Change Management Area and is forecast to be affected by erosion within 20 years of the date of the proposal;
- the new development is beyond the Coastal Change Management Area shown on the Policies Map and is in a location that is well related and accessible to the coastal community from which it was displaced;
- the site of the development / use it replaces is either cleared and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate; and
- taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

Proposals for the relocation and replacement of dwellings affected by erosion will be permitted, provided that:

- the development replaces a permanent dwelling (with unrestricted occupancy), which is within the Coastal Change Management Area and is affected by erosion within 20 years of the date of the proposal; and,
- the new dwelling(s) is used as a primary residence;
- the new development is beyond the Coastal Change Management Area shown on the Policies Map and is in a location that is well related to the coastal community

from which it was displaced and;

- adjoins an existing group of dwellings;
- the development does not result in an isolated form of development;
- the development is in proportion to and respects the character, form and appearance of the immediate vicinity and surrounding area;
- is consistent with other policies in the Local Plan.

If such a site is not available, the relocated development is within or adjacent to a selected settlement in the North Norfolk Local Plan.

- the site of the dwelling it replaces is either cleared, and the site rendered safe and managed for the benefit of the local environment, or put to a temporary use that is beneficial to the well-being of the local community, as appropriate. The future use of the site should be secured (by legal agreement) in perpetuity. Interim use as affordable housing will be considered beneficial to the well-being of the local community in interpreting this clause; and
- taken overall (considering both the new development and that which is being replaced) the proposal should result in no detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
Introduce a policy to assist with coastal adaptation.	This option complies with the NPPF. It will enable coastal adaptation and roll-back of affected communities so that relocation is permitted not only on sites well-related to the settlement from which the property is moving, but also to allow for development adjacent to selected settlements to allow for a wider site search.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
Not to introduce a policy to assist with coastal adaptation and instead rely on National policy and guidance.	This option does not comply with the NPPF. It does not enable properties at risk to address the problem of loss through coastal erosion. Does not provide support to coastal communities.

## Approach to Green Infrastructure

The purpose of this policy is to safeguard, retain and enhance the network of green infrastructure.

The network of green infrastructure in North Norfolk will be safeguarded, retained and enhanced in line with the North Norfolk Green Infrastructure Strategy. The protection and enhancement of the green infrastructure network will be sought through the development management process in line with the principles, priorities and action plans detailed in the Green Infrastructure Strategy including mitigating towards recreational impacts.

### Policy xx Green Infrastructure

New developments will have regard to the green infrastructure strategy and incorporate green infrastructure principles into proposals, including:

- the delivery of new green infrastructure;
- the mitigation and enhancement of existing green infrastructure;
- improving green infrastructure connectivity;

Through its layout and design, new development should respond to the location of existing green infrastructure and deliver appropriate uses and functions.

Development in Cromer, Fakenham and North Walsham should consider the Green Infrastructure Strategy for each town and incorporate green infrastructure proposals in line with the detailed Action Plans.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
To introduce a policy to protect, provide and enhance green infrastructure. The Policy will be supplemented by a Green Infrastructure Strategy.	This option complies with National Policy. The delivery of a supporting green infrastructure strategy is in line with NPPF paragraph 20
<b>Alternative Option 1</b>	<b>Why it is not Preferred</b>
To introduce a policy to protect, provide and enhance green infrastructure. Rely on other bodies to deliver a green infrastructure strategy and green infrastructure proposals.	This option would represent a missed opportunity to have a local policy that fully reflects the NPPF and Government strategy. This option would not promote the delivery of a green infrastructure strategy or meet National Policy aspirations that Local Plans should identify the strategic location of existing and proposed green infrastructure networks.
<b>Alternative Option 2</b>	<b>Why it is not Preferred</b>
Not to introduce a policy and instead rely on National policy and guidance	This option would represent a missed opportunity to have a local policy that fully reflects the NPPF and Government strategy. This option would not positively provide for green infrastructure in the district and would have a negative impact on the Plan's sustainable development objectives.

## Approach to Affordable Housing in the Countryside

### Policy xx Affordable Housing in the Countryside

Proposals for affordable housing development within the area designated as Countryside will be permitted only where:

- the proposal would help to address a proven local housing need for affordable housing as demonstrated in up to date evidence
- the site adjoins an existing group of ten or more dwellings
- the affordable housing provided is made available to people in local housing need at an affordable cost for the life of the property (the Council will ensure that any planning permission granted is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity).
- The size of the scheme takes account of the level of local need and is not disproportionately large\* in relation to the existing community.
- Where market housing is included within proposals this should not typically exceed 30% of the total number of dwellings and should be clearly demonstrated to be necessary in order to deliver affordable dwellings which would not otherwise be provided.

For the purposes of this policy 'local housing need' means the need in the Parish and adjacent Parishes as evidenced by the most up to date evidence.

\*should not normally result in more than a 5% increase in the number of dwellings in the village

## Approach to Tourism

### Policy xx - New-Build Tourism Accommodation, Static Caravans and Holiday Lodges

North Norfolk will be promoted and developed as a destination for tourists and visitors whilst recognising the need to sustain and conserve the environment and local communities. This will be enabled through the provision of new-build visitor accommodation<sup>3</sup>, static caravans and holiday lodges in accordance with the following:

- the site lies within the settlement boundary of a selected settlement, or
- the proposal is for the expansion of an existing business, or
- the proposal is for a new static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3 and the replacement site would not be located within the AONB, the Heritage Coast or Undeveloped Coast, and,
- In the case of business expansions and replacement developments, it is clearly demonstrated that the proposal would result in net benefit in terms of landscape and ecology when compared to the existing development and would not have a significantly detrimental impact on the amenity of neighbouring land uses, the character of the area by virtue of increased noise and impacts on light and highway safety and the operation of the highway network.

Where the development is for a hotel, this should usually demonstrate compliance with the Main Town Centre Uses sequential approach in accordance with national and local retail policies.

Preferred Option	Why it is Preferred
This policy seeks to ensure that new-build tourist accommodation, static caravans and holiday lodges are located in appropriate locations as well as allowing flexibility for existing businesses within the countryside the opportunity to expand where appropriate.	The preferred approach recognises the importance of having a broad range of tourist accommodation available across the District to support the District's economy, whilst also recognising the need to sustain and conserve the environment. It will accord with the NPPF by supporting a prosperous rural economy.
Alternative Option	Why it is not Preferred
No policy, rely on the NPPF.	Having a policy means that the response to development proposals can be tailored to North Norfolk, where tourism is vital to the District's economy and where the economy is heavily reliant on the natural environment.

<sup>3</sup> Including buildings such as static caravans, lodges, cabins and guest houses.

## Policy xx - Use of Land for Touring Caravan and Camping Sites

Proposals for the use of land for touring Caravan and Camping Sites<sup>4</sup> will be encouraged where:

- The site lies within the settlement boundary of a selected settlement, or
- the proposal is for the expansion of an existing business, or
- The site lies outside the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3; and,
- In the case of business expansion, there would be no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network.

Preferred Option	Why it is Preferred
This policy seeks to ensure that the use of land for touring caravan and camping sites is located in appropriate locations.	The preferred approach recognises the importance of such accommodation in supporting the tourist economy within the District, whilst also recognising the need to sustain and conserve the environment. It will accord with the NPPF by supporting a prosperous rural economy.
Alternative Option	Why it is not Preferred
No policy, rely on the NPPF.	Having a policy means that the response to development proposals can be tailored to North Norfolk, where tourism is vital to the District's economy and where the economy is heavily reliant on the natural environment.

<sup>4</sup> Including (but not limited to) sites used for touring caravan and camping sites, glamping, yurts, tepees and shepherd's huts.

## Policy xx - New-Build Tourist Attractions

The Council will support proposals for new build tourist attractions<sup>5</sup> across the District by applying the following principles.

Main Town Centre Tourist Attractions:

- except where the proposal is for an expansion to an existing business, proposals for new Main Town Centre tourist attractions<sup>6</sup> will be encouraged where the development demonstrates compliance with the Main Town Centre Uses sequential approach in accordance with national and local retail policies.

Other Tourist Attractions:

- the site lies within the settlement boundary of a selected settlement, or
- the development is for the expansion of an existing business, or
- the development lies outside the boundary of a selected settlement but:
  - Does not lie within the AONB, Heritage Coast, or Undeveloped Coast; and,
  - It has been demonstrated that there are no suitable buildings for re-use and;
- In the case of business expansion, there would be no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network.

Preferred Option	Why it is Preferred
This policy seeks to ensure that tourist attractions that can broaden tourist opportunities across the District and can extend the tourist season are encouraged in appropriate locations.	The preferred approach recognises the importance of supporting the tourist economy within appropriate locations, whilst also recognising the need to restrict development within sensitive landscapes. It will accord with the NPPF by encouraging sustainable rural tourism which respects the character of the countryside.
Alternative Option	Why it is not Preferred
No policy, rely on the NPPF.	Having a policy means that the response to development proposals can be tailored to North Norfolk, where tourism is vital to the District's economy and where the economy is heavily reliant on the natural environment, much of which is highly protected.

<sup>5</sup> For recreational, cultural and leisure uses.

<sup>6</sup> Includes theatres, museums, galleries and concert halls, hotels and conference facilities.



## **Policy xx - Retaining an Adequate Supply and Mix of Tourist Accommodation**

Development proposals that would result in the loss of sites or premises currently, or last used for tourist accommodation<sup>7</sup> will be permitted provided that:

- alternative provision of equivalent or better quality and scale is available in the area or will be provided and made available prior to commencement of redevelopment; and,
- the facility does not provide an important local facility or service<sup>8</sup> to the community; or
- it can be demonstrated that there is no reasonable prospect of retention at its current site; and that an independent viability test has demonstrated that the use is no longer viable and that all reasonable efforts have been made to sell or let the property at a realistic price for a period of at least 12 months.

<b>Preferred Option</b>	<b>Why it is Preferred</b>
This policy seeks to ensure that a broad mix of all types of tourist accommodation is retained.	The preferred approach recognises the importance of retaining a diverse range of tourist accommodation across the District, whilst recognising that there may be circumstances where the loss of tourist accommodation is acceptable.
<b>Alternative Option</b>	<b>Why it is not Preferred</b>
No policy, rely on the NPPF.	Having a policy means that the loss of beneficial tourist accommodation (except when specific criteria are met) can be discouraged.

<sup>7</sup> All hotels and other serviced establishments, all self-catering units and including (but not limited to) touring/static caravans/camping sites which provide more than 5 units.

<sup>8</sup> Public house / bar, restaurant or leisure facility where this is within the Countryside or is the last of its kind within a Principal or Secondary Settlement or Service Village.

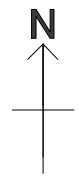
**Town Centre and Primary Shopping Areas.**



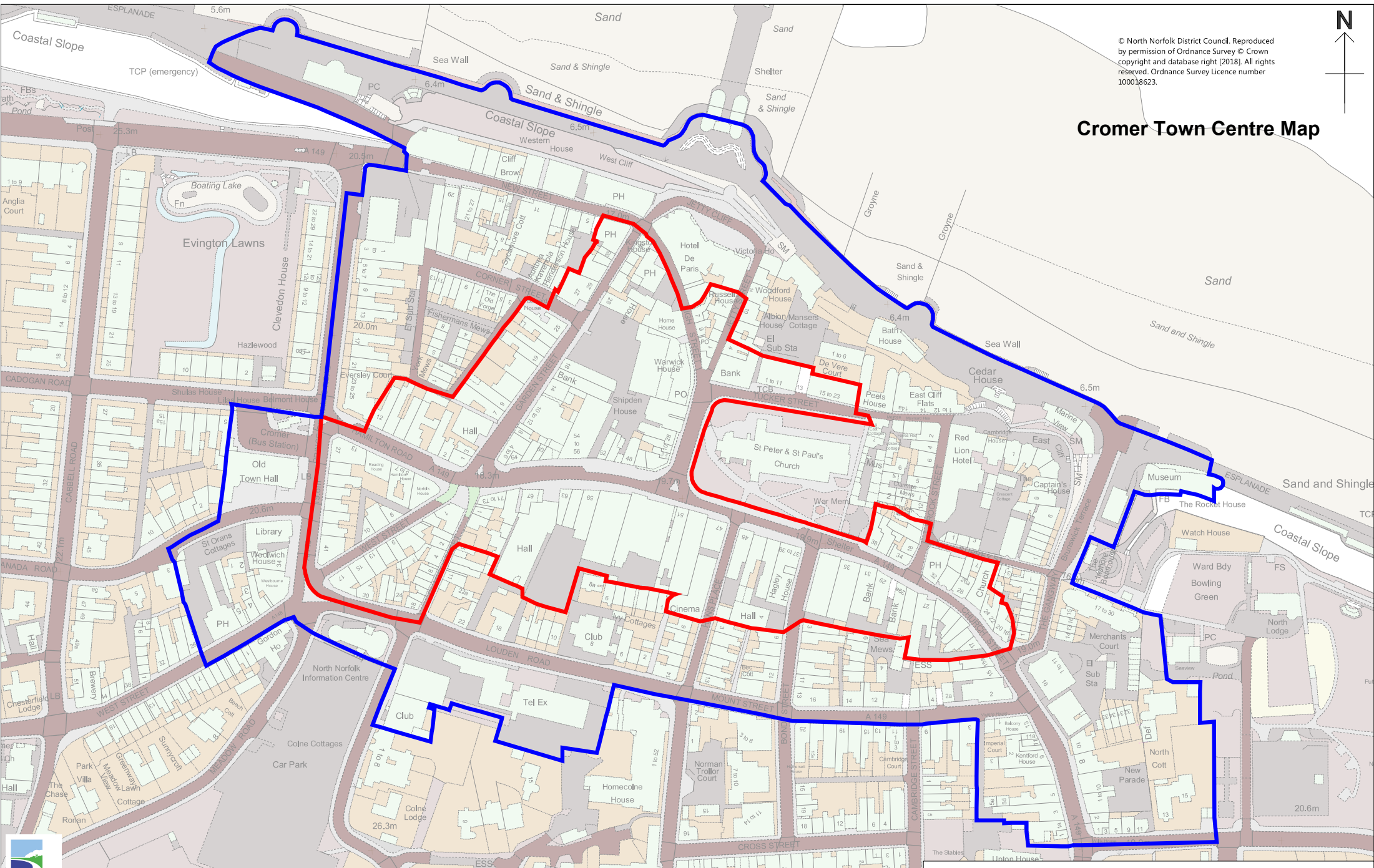
# Cromer Town Centre Map (AERIAL)



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# Cromer Town Centre Map



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# Fakenham Town Centre Map (AERIAL)



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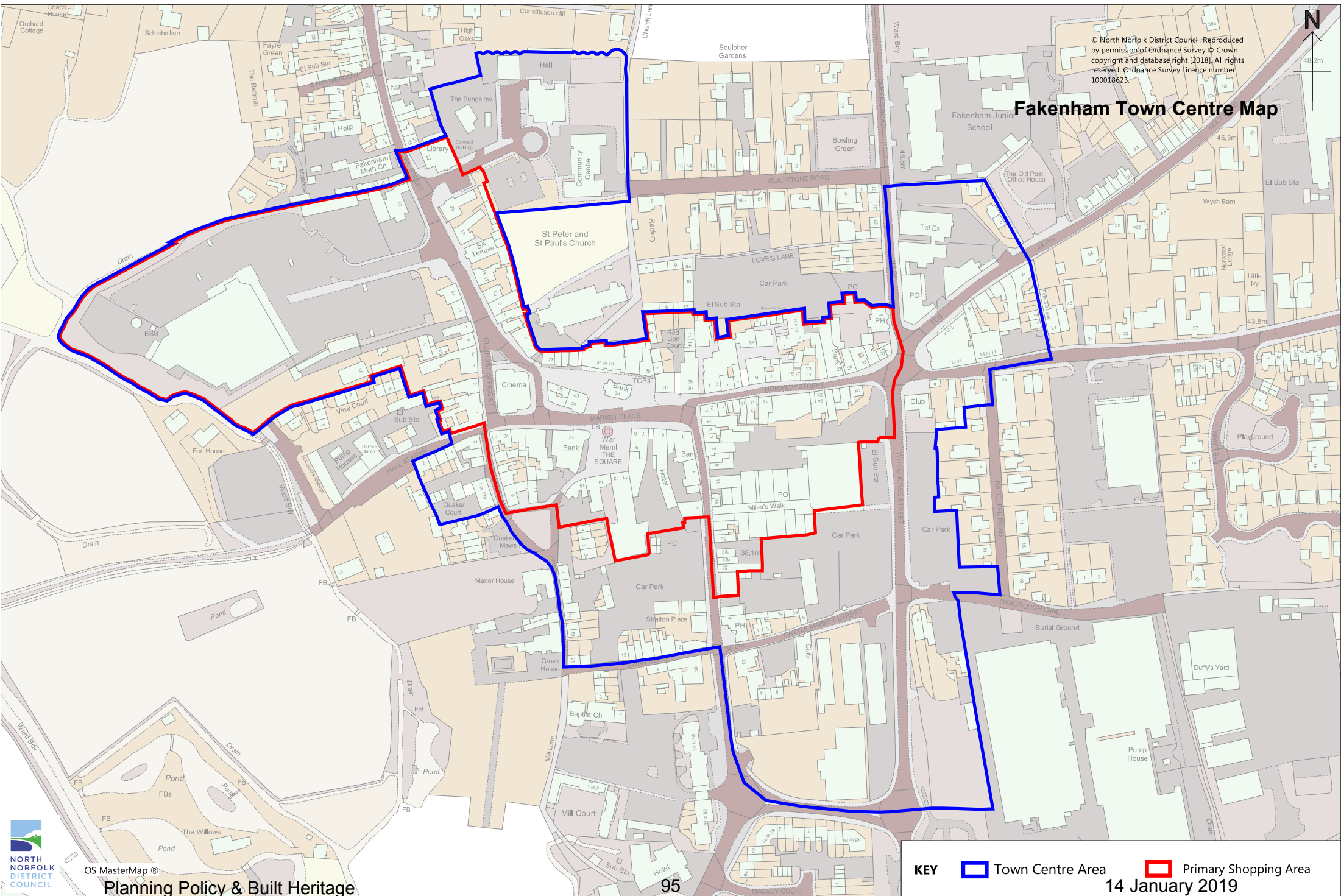
**KEY**  Town Centre Area  Primary Shopping Area

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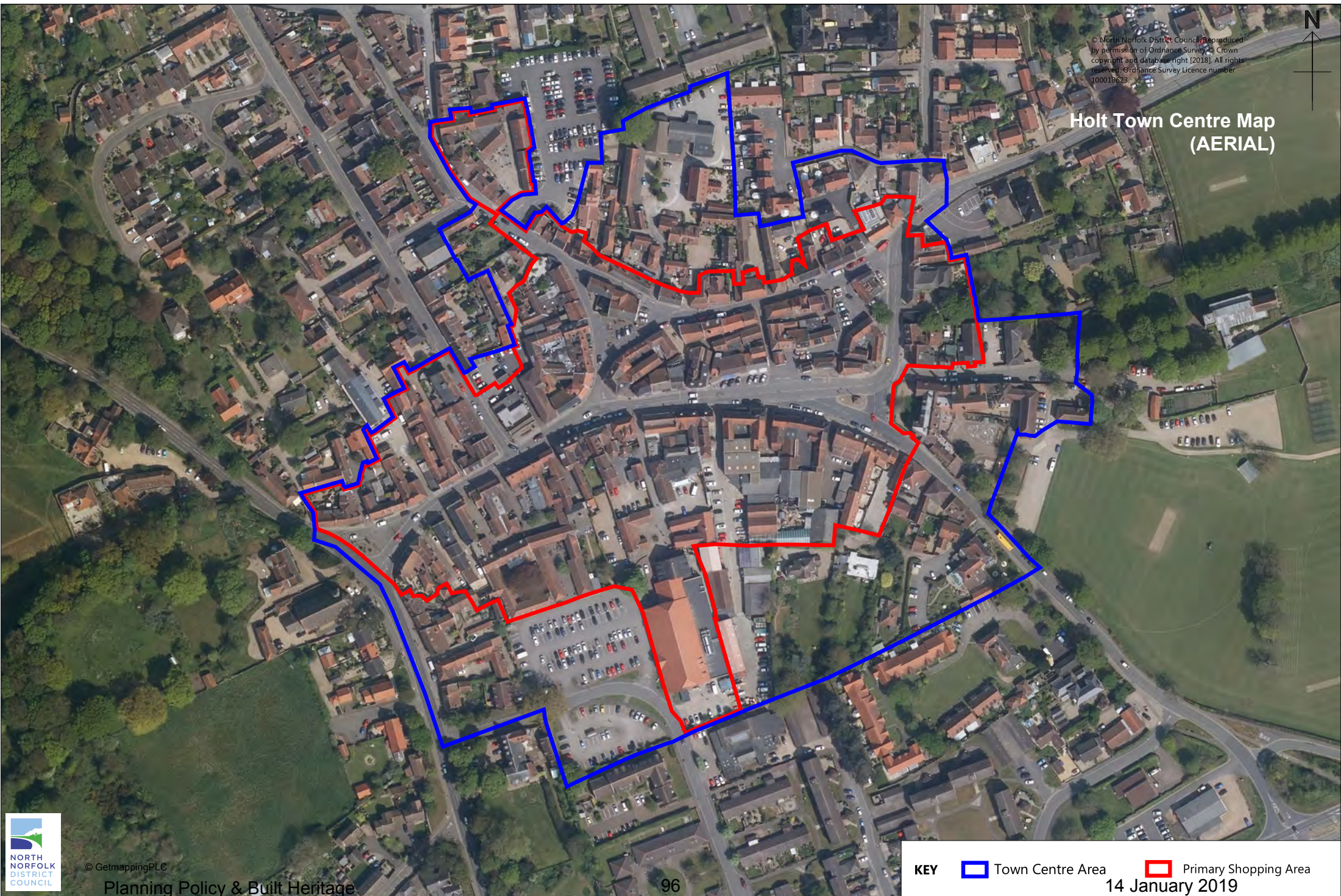
# Fakenham Town Centre Map



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# Holt Town Centre Map (AERIAL)



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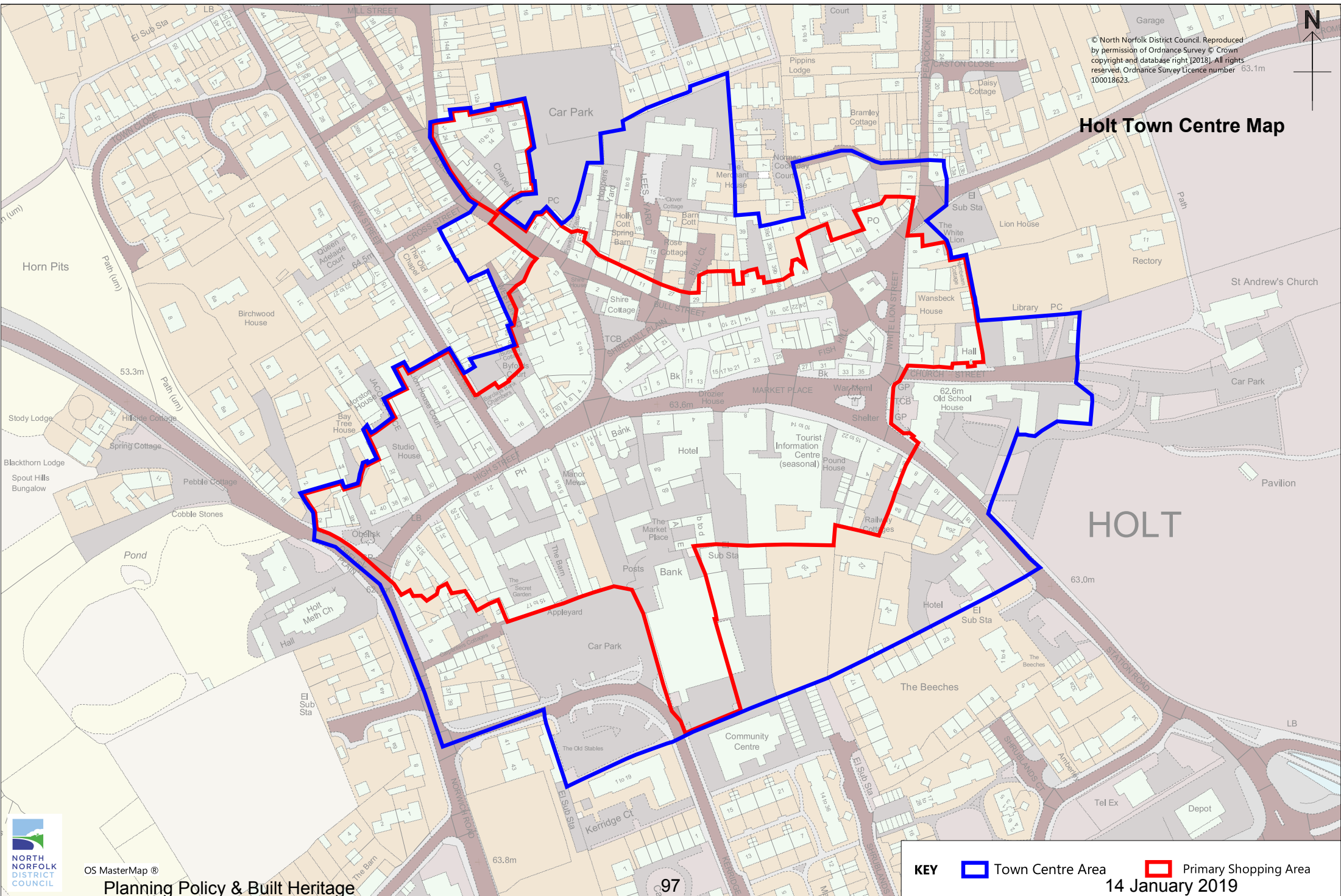
Planning Policy & Built Heritage Working Party

<b>KEY</b>	 Town Centre Area	 Primary Shopping Area
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# Holt Town Centre Map

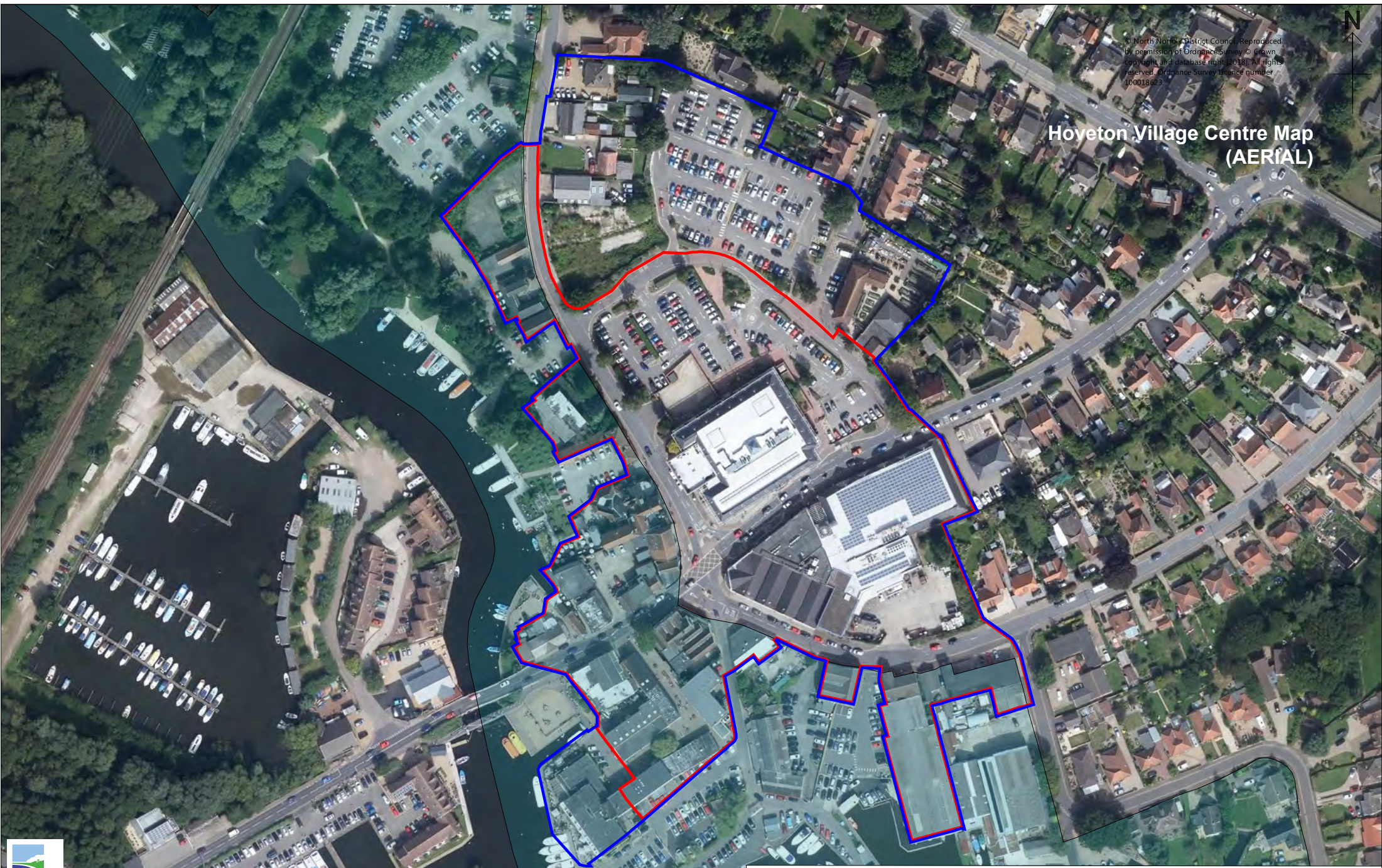




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# Hoveton Village Centre Map (AERIAL)




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Planning Policy & Built Heritage Working Party

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 Town Centre Area

 Primary Shopping Area

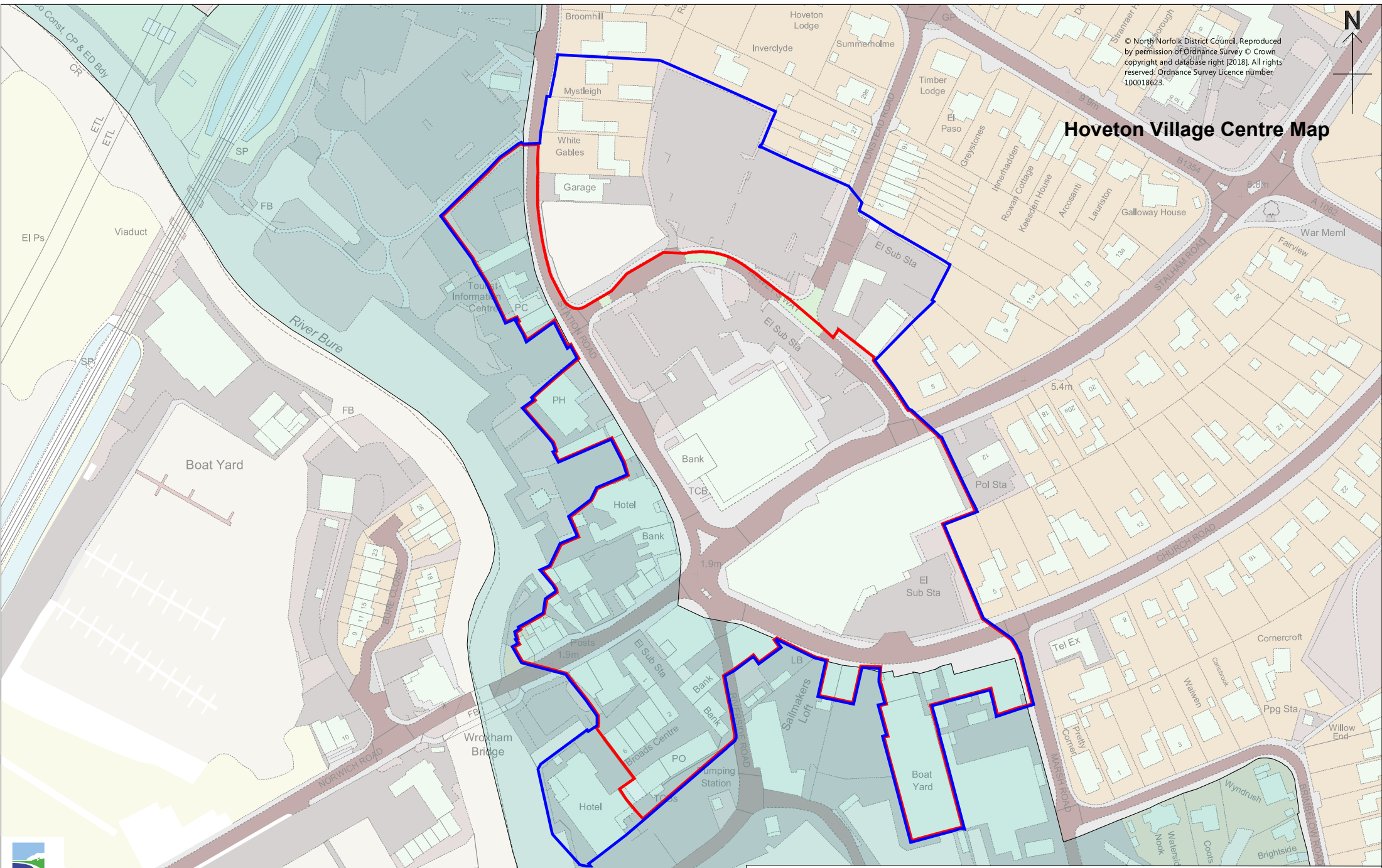
 Broads Authority Area

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# Hoveton Village Centre Map



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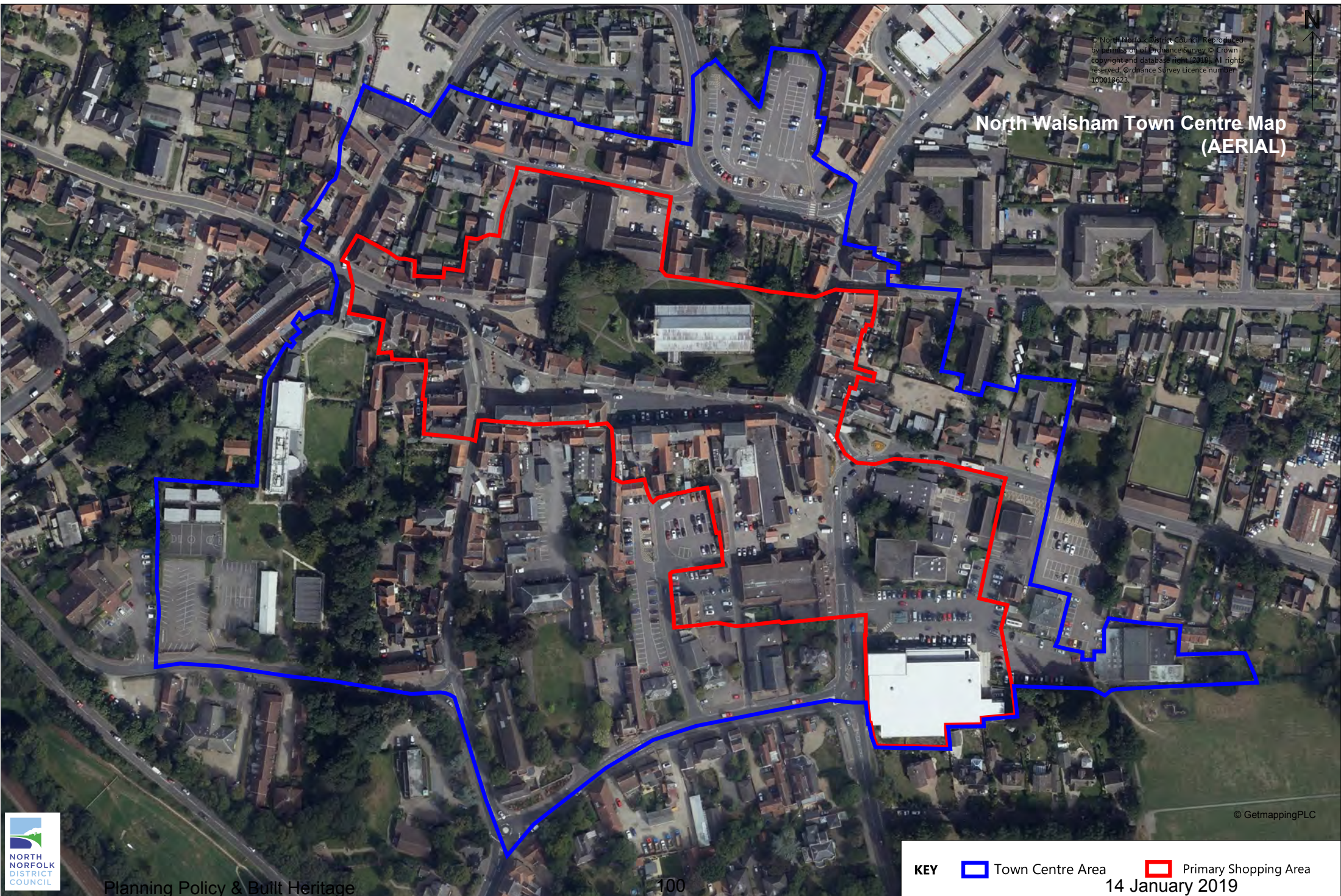
- Town Centre Area
- Primary Shopping Area
- Broads Authority Area



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# North Walsham Town Centre Map (AERIAL)

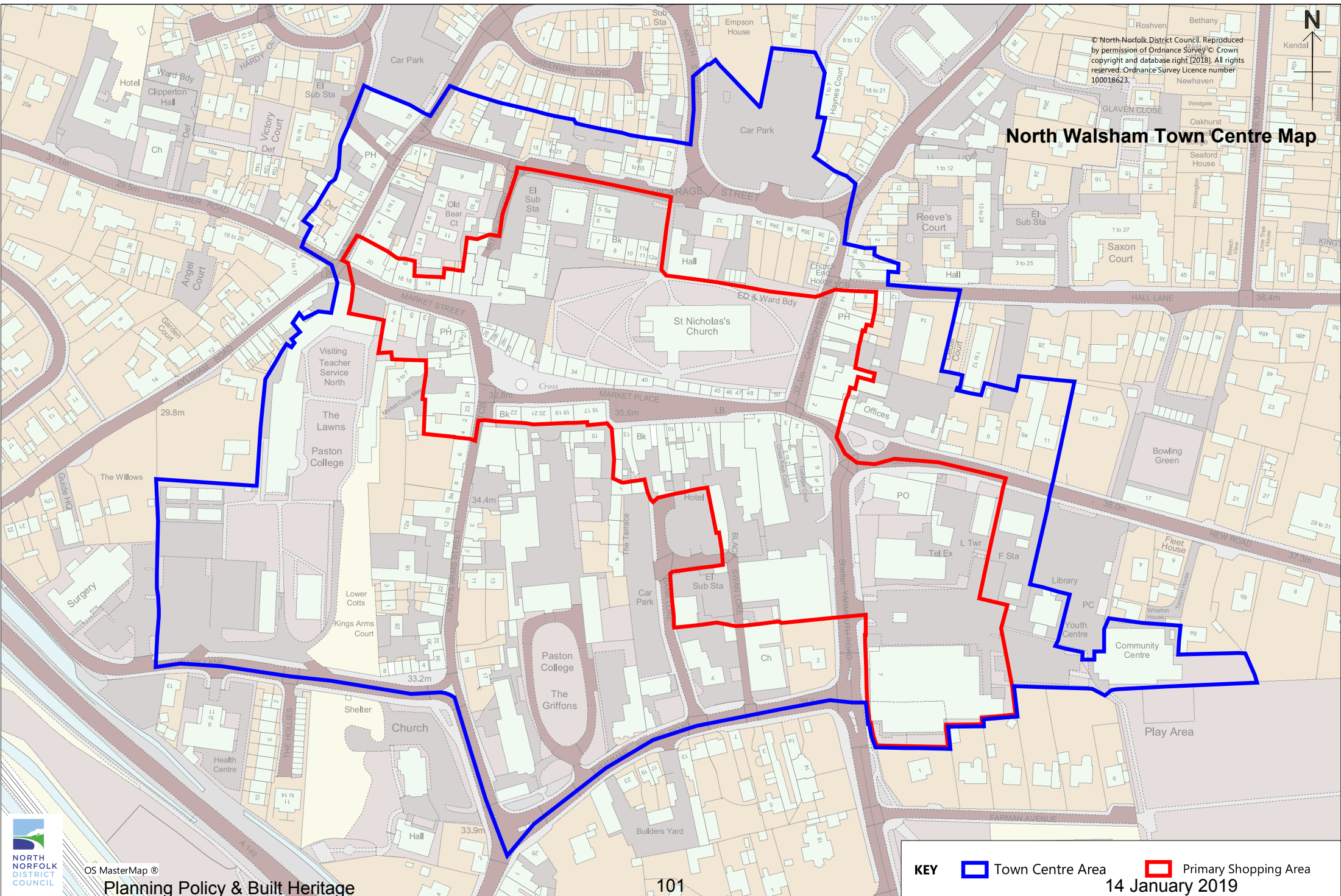


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# North Walsham Town Centre Map



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# Sheringham Town Centre Map (AERIAL)



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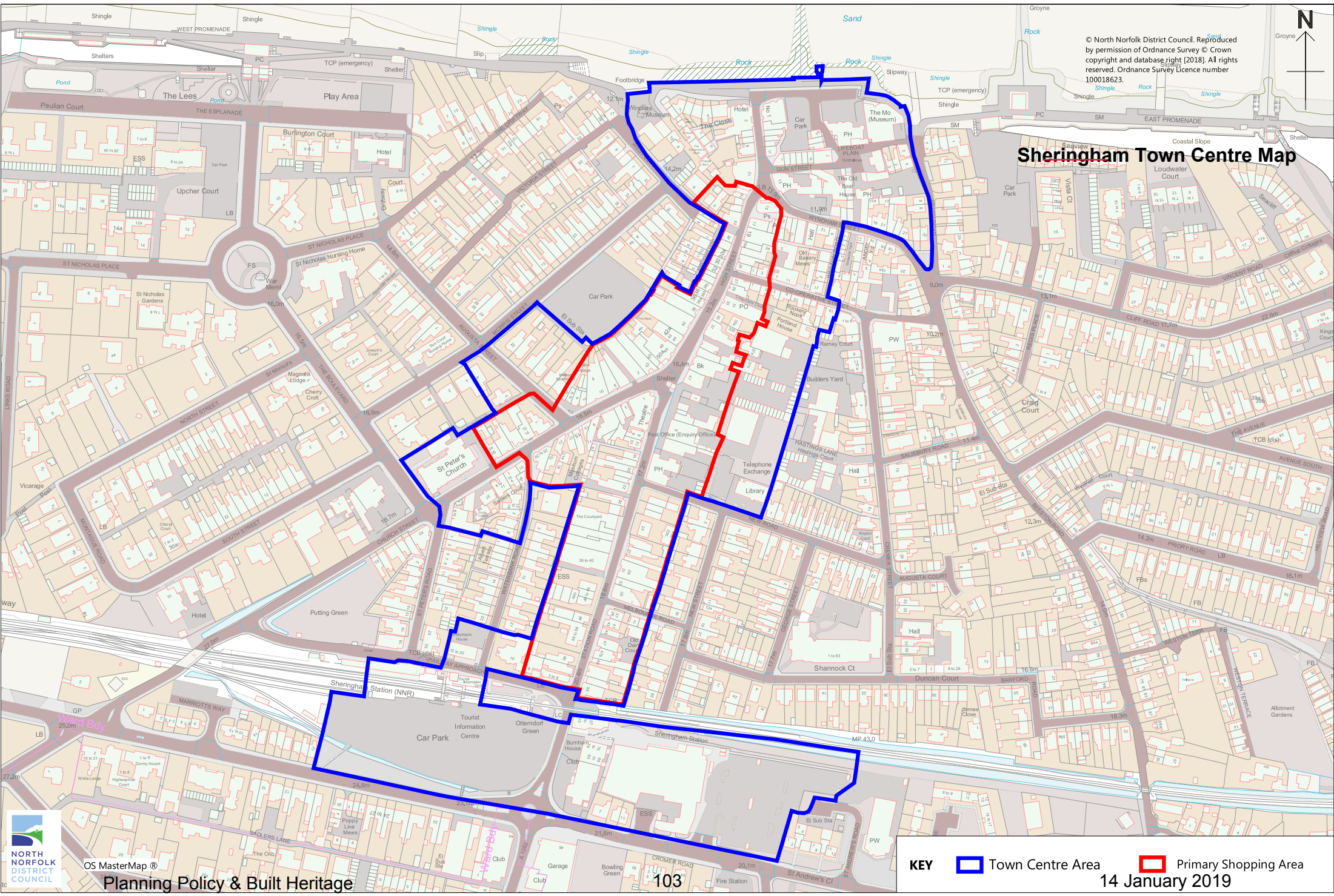


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# Sheringham Town Centre Map



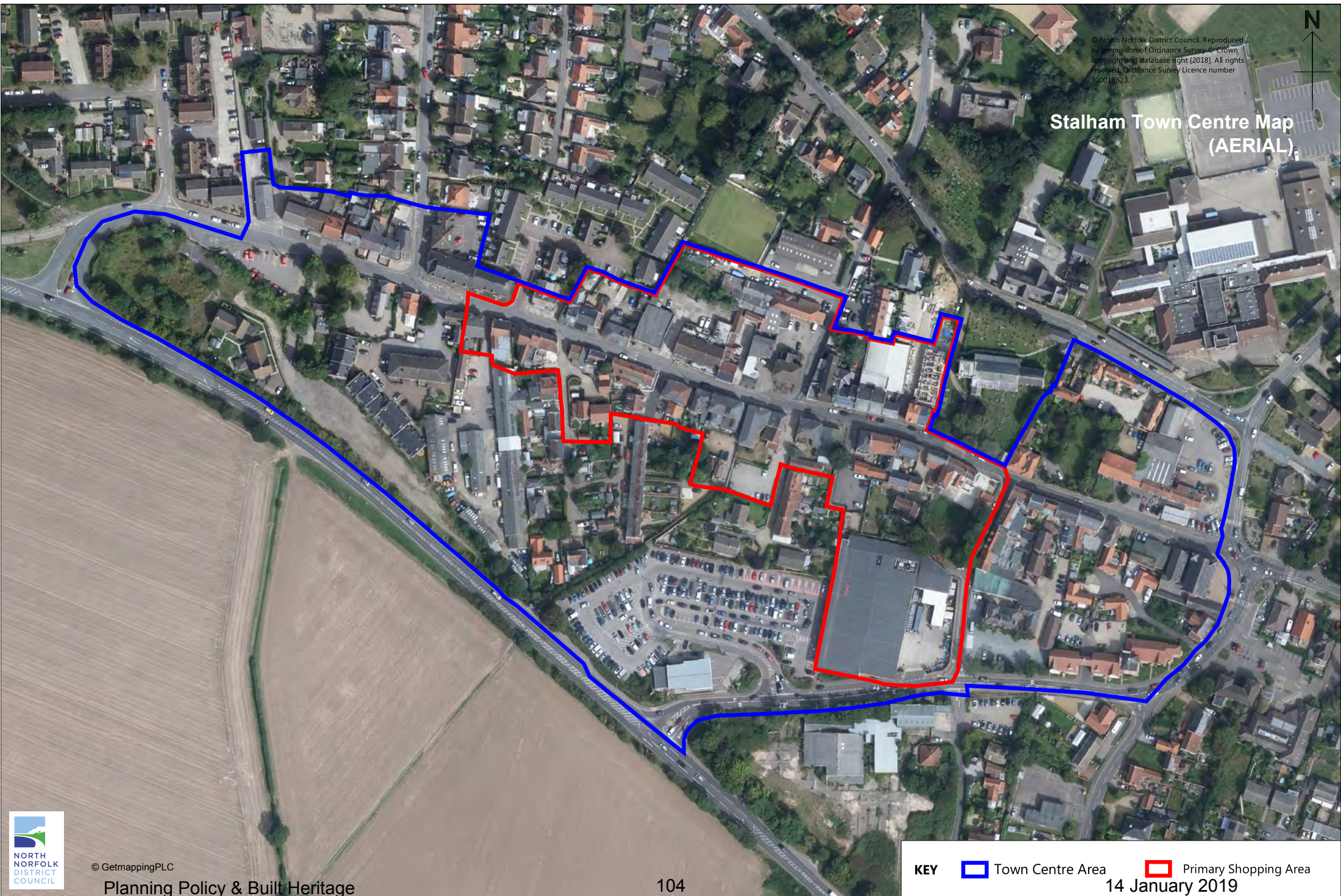
**KEY**   Town Centre Area   Primary Shopping Area

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# Stalham Town Centre Map (AERIAL)



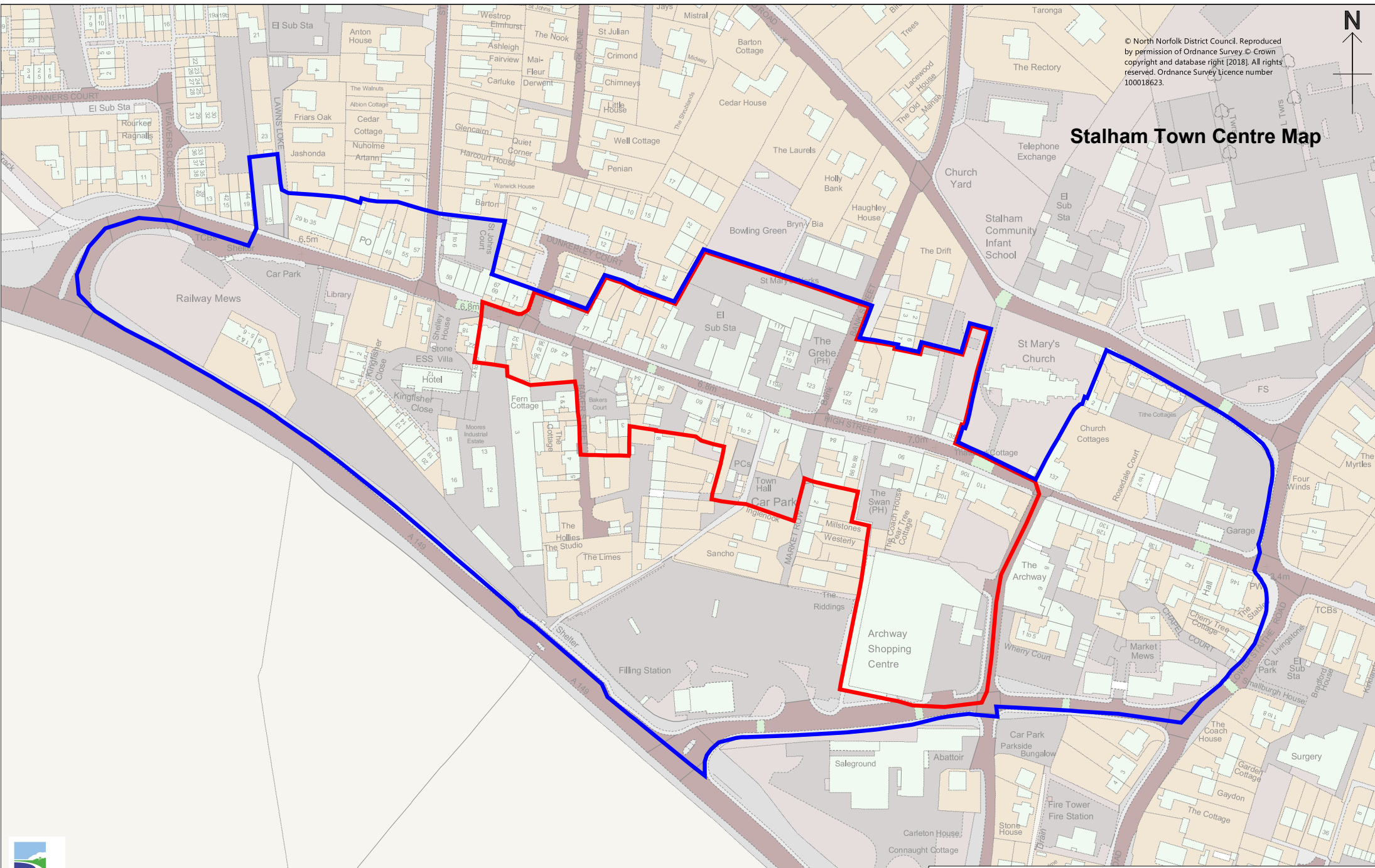
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# Stalham Town Centre Map







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# Wells Town Centre Map (AERIAL)



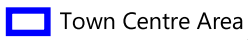

<b>KEY</b>	 Town Centre Area	 Primary Shopping Area
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# Wells Town Centre Map



**KEY**     Town Centre Area     Primary Shopping Area

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