

## Small Growth Villages and Policy Approaches to Growth in Rural Areas

Summary: To identify the final suite of Small Growth Villages that policy SD3 applies to and to establish the overarching approach to the identification and delivery of the apportioned growth in Small Growth Villages, including the ratification of the approach through a suite of policies that deliver flexible and exception growth in the rural areas.

- Recommendations:
- 1. It is recommended that members endorse the changes to the list of Small Growth Villages.**
  - 2. It is recommended that members endorse the revised approach and delegate responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

**Options: There are three options available for consideration:**

**Option 1: Members endorse the revised approach;**

**Option 2: Members do not endorse the revised approach;**

**Option 3: Members provide support for the revised approach and provide further direction.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
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### 1. Introduction

- 1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced which will determine if the Draft Plan is

sound, with or without further modifications, following which the Plan can be formally adopted by the Council.

- 1.2 This report focusses on the broad distribution of growth in relation to rural development and discusses the options available and recommends modifications to the Draft Plan for inclusion in the submission version.
- 1.3 **The purpose** of this report is following consultation to identify the final suite of Small Growth Villages that policy SD3 applies to and to establish the overarching approach to the identification and delivery of the apportioned growth in Small Growth Villages, including the ratification of the approach through a suite of policies that deliver flexible and exception growth in the rural areas.

## 2. Background and update

- 2.1 Our towns and villages that provide an appropriate level of services are central to our strategy. It is their role and function, not simply their size that determines the appropriate level of development to be planned for.
- 2.2 In order to maintain and enhance these places the Plan takes an approach to growth that encourages jobs and homes, where they best deliver our strategic priorities and allows for more organic development where it supports or enables the provision of appropriate services and facilities locally. Thus delivering on sustainable development principles. The location of development is one of the fundamental determinants of sustainability and has impacts on many of the environmental, economic and social dimensions of land use planning. It is also inextricably linked to **climate change** and how through the Plan the Council can incorporate measures that mitigate and adapt to its effects.
- 2.3 Specific housing targets and allocations are provided for in the Large Growth Towns, Small Growth Towns and the four identified Growth Villages in policy HOU1, which reflects their role and function. Sites have been identified that are well related to these towns in order to meet the proposed targets. In addition to the planned growth, provision for additional growth is made through policy SD2 for communities to identify and bring forward additional housing sites at suitable locations and scale in accordance with the strategic policies of the Plan. Additional growth can also be brought forward through neighbourhood planning and through a number of policies that relate to this issue in the Plan.
- 2.4 Policy SD3 identified and consulted on a number of settlements as Small Growth Villages. Such settlements do not meet the level of service provision of higher order settlements but nevertheless, were identified as providing a limited level of services that act as basic service hubs and daily needs for nearby villages and, as such, contribute to the vitality of the rural district. The detailed approach in their identification was published in Background Paper 2 which accompanied the earlier consultation documents.
- 2.5 Policy HOU1 made provision for 400 dwellings to be provided from Small Growth Villages in the development hierarchy over the Plan period, through the identification of suitable sites /approach in a part 2 Plan prior to publication.
- 2.6 Outside the settlement hierarchy and as set out in policy HOU1 the delivery of the housing requirement also relies on an annual requirement of approx. 135 dwellings through windfall means<sup>1</sup>. The reliance on windfall will diminish through plan

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<sup>1</sup> 2,160 (minimum) across the remainder of the plan period (2020-2036)

preparation as permission is granted and will be taken into account in the update of policy HOU1.

2.7 Although elements of such an approach can be considered as diminishing returns, historically the District has delivered a consistent amount and the emerging approach is viewed as conservative and realistic. Such a windfall amount can come through a variety of policy means, each designed to allow a flexible and pragmatic approach to the delivery of growth in a manner that reflects the District and that accords with the NPPF as listed below;

- 1 Development in the Countryside, policy SD4, sets out the strategic approach and overriding principle in areas outside settlements with development boundaries. Residential development is limited to that appropriate to: agricultural/ forestry use, affordable homes, replacement dwellings, subdivision of dwellings, key worker's accommodation and that for gypsies and travellers, community led development, and specialist accommodation for the elderly and others requiring care, where there is a demonstrable need.
2. Policy SD2 sets out a flexible criteria based policy approach that is supportive of residential community led development which may not comply with some aspects of the Plan, but provided that it is supported by the community and it can be demonstrated that the proposal is needed and will make a meaningful contribution to the vitality of the community and addresses local needs. The approach is not limited to residential development but also includes support for small business units where it is demonstrated that the proposal will contribute positively to the community as a whole. The mechanism for delivery is through legitimate community groups such as parish council's and community land trusts.
3. Affordable Homes in the Countryside, (Rural exception Sites) policy **HOU3**, - based on identified local need, sites and proposals can be brought forward to meet that need in any settlement in the settlement hierarchy and "countryside" locations. Such sites would be subjected to occupancy restrictions which limit occupation to the parish and adjacent parish in line with housing allocation policies of the council and is the means of providing local homes for local people. 68 rural exceptions homes have been completed over the last three years with a further 15 expected to be completed<sup>2</sup> in this financial year bringing the three year total to 83 dwellings.
4. Provision & Retention of Local facilities and services policy SD6, contains the provision for residential development to support the provision of, retention and enhancement of healthcare facilities including specialist accommodation on Health and Social Care campuses.
5. Coastal Adaptation, policy SD12 contains the policy framework that allows for replacement dwellings affected by erosion to be permitted outside the Coastal Change Management Area, provided that they are closely related to the coastal community from which it is being displaced.
6. Agricultural and Other Key worker Accommodation, policy HOU4, sets out criteria to facilitate development for agricultural, forestry and other essential workers, in the countryside policy area.
7. Policy HOU5 sets out criteria to facilitate appropriate scale and nature of accommodation for Gypsy, Travellers accommodation.

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<sup>2</sup> 3 Binham, 12 Edgefield

8. A number of the policies in relation to employment, tourism and retailing include location controls, although they can contribute to residential growth they are not considered to be directly focused on the broad distribution of residential growth. These policies along with site-specific policies will be brought back for consideration in later reports.

2.8 In addition to the Local Plan,

- Secondary legislation contained within the General Permitted Development Order 2015 (as amended) contains permitted development rights that also increase the number of homes delivered through changes of use. The permitted change of use and prior notification mechanisms enable a range of existing office, commercial and agricultural buildings to be converted to residential accommodation.
- Any positively prepared neighbourhood plan, subsequently will also contribute to windfall growth through the identification of additional growth sites in relation to the evidence of local needs. To date the only neighbourhood plan that has (or is proposing) identified growth locations is Corpusty & Saxthorpe. The Local Plan though does not rely on this or any other Neighbourhood Plan to enable the delivery of the Council's housing requirement.

2.9 In combination policy SD3 and HOU1 provide a proposed split of housing as detailed in the Table 1 below:

**Table 1: Distribution of Growth**

Tier of hierarchy	Settlement	Commitments (up to 31.03.2019)	Completions (01/04/2016 - 11.02.2020)	Proposed allocation / growth	Total Growth	Overall % of development
Large Growth Towns	North Walsham	209	362	2150	2721	47.3
	Fakenham	1180*	189	680	2049	
	Cromer	177	109	592	878	
Small Growth Towns	Wells	30	79	80	189	17.3
	Sheringham	235	111	135	481	
	Holt	339	218	327	884	
	Stalham	71	87	150	308	
	Hoveton	56	2	150	208	
Service Villages	Briston & Melton Constable	116	33	80	229	3.9
	Mundesley	26	57	50	133	
	Ludham	9	1	40	50	
	Blakeney	5	19	30	54	
Small Growth Villages	Aldborough^	5	0	15	20	7.8
	Badersfield	0	0	37	37	
	Bacton^	9	46	31	86	
	Binham	19	20	8	47	
	Catfield^	10	3	27	40	
	Corpusty & Saxthorpe^	21	7	19	47	

	East and West Runton+	15	12	43	70	
	Happisburgh ^	12	3	24	39	
	High Kelling	4	0	17	21	
	Horning^	6	2	29	37	
	Little Snoring^	29	13	16	58	
	Little Walsingham^	10	4	21	35	
	Overstrand^	15	46	25	86	
	Potter Heigham±	2	3	0	5	
	Roughton^	33	32	24	89	
	Sculthorpe	4	3	20	3	
	Sea Palling±	3	0	0	27	
	Southrepps^	8	11	21	40	
	Sutton	0	3	30	33	
	Trunch	13	27	24	64	
	Walcott±	9	2	0	11	
	Weybourne^	8	11	21	40	
	<b>Total proposed allocation in Infill villages</b>			<b>452</b>		
<b>All other Areas</b>		373	300		673	<b>5.6</b>
	<b>Windfall over the plan period</b>				2160	<b>18.1</b>
<b>Total</b>		<b>3061</b>	<b>1815</b>	<b>4916</b>	<b>11952</b>	

\* Fakenham Commitments Includes outline application for 950 dwellings (PO/17/0680), which has not yet been granted.

\*\* Corpusty and Saxthorpe Neighbourhood Plan allocates three priority development sites

+ Combined for the purposes of producing a 5% growth figure based on Census data

^ Indicates settlements which currently have a settlement boundary

± indicates that although the settlement has the service and facilities to be considered an infill village, the settlement is environmentally constrained and no growth is proposed.

Settlement referred to as a '**Constrained Small Growth Village**'

*The Local Plan housing apportionment table sets out the level of growth expected in the District. Some of this housing will already have been built by the time the Plan is adopted and other sites will also have obtained planning permission but not yet have been built (commitments). The table should therefore be seen as indicating the direction of travel and be indicative as a point in time. A future working party will consider the final settlement numbers in relation to distribution, preferred site options and land availability following separate discussion on the finalisation of site options. Percentage growth figures are likely to change the closer to submission and adoption as completions and commitments change.*

2.10 Although it is not the purpose of this report to discuss the overarching numbers it is worth noting at this stage that It must be recognised that there is no one single factor that determines the precise level of growth in a particular location. There is a complex relationship between development needs, opportunities and constraints which inform decisions and detailed through a complex matrix of considerations set out in the sustainability appraisal, appropriate assessment (Habitat Regulation Assessment) and the appraisal methodologies set out in the background papers and site assessment process. There are differing opinions on how such a balance should be struck. Some may argue that the environmental impacts should be given less weight in the interests of providing more homes in particular locations, similarly some will argue that viability should lead to an increase in numbers in the more

“marketable “areas of the District, others however take the view that protecting the landscape and environment is the more important concern, while social considerations remain the priority of others. These matters will be tested at examination in relation to whether the Plan proposes an appropriate approach that is justified by the supporting evidence and consideration of the reasonable alternatives. It is important to remember that policies and decisions that flow from these policies are in response to meeting development pressures and District needs and are informed by evidence and a methodology and approach that is applied in a consistent way across the whole of the district.

### 3. Feedback Regulation 18

- 3.1 The regulation 18 consultation document included a commitment to produce a Part 2 Plan in which, infill opportunities and small scale allocations of up to 20 homes would be brought forward in order to identify policy HOU1 policy requirement of a minimum 400 dwellings across the identified small growth settlements. A call for sites in these locations resulted in a further 72 sites being put forward across 20 locations. This was in addition to those already identified through the earlier HELAA process.
- 3.2 In Total 209 sites have been put forward across this tier, comprising of 117, 1ha and below, and 92 sites over above the 1 heater threshold,
- 3.3 Feedback on the approach (SD3) can be seen in the Schedule of Responses previously reported to Members. Summaries are contained in Appendix 3 of this report and are summarised below:
- 3.4 **Parish Councils (7):** the majority of responses highlighted the requirement for growth to be located in locations with services with some suggesting that the limited services in these rural village locations is not conducive to further expansion. The reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small-scale allocations ran the risk of disproportionate and unsustainable growth.
- 3.5 The majority of **individual respondents** who objected (40) objected to Policy SD3 in relation to the provision of growth in the Small Growth Villages and the Countryside. Housing development should be focused where there is appropriate infrastructure, public transport, healthcare and other services including employment and the approach fails to integrate the problems of climate crisis. Many suggested that rather than allocating in these villages, development be allowed on infill and brownfield sites. For those that supported the overall policy approach (10+15 general comments) it was a similar message with support given to the appropriate strategy that directs growth to those settlements that have services and where it results in more sustainable growth.
- 3.6 Collectively most commented that in order to meet environmental objectives, development should be focused where appropriate infrastructure, services, public transport and employment are in place and where there is a specific housing need and the overall support for focusing development in Large Growth Towns, which are the largest most sustainable locations and also able to accommodate growth.
- 3.7 Specifically, in relation to Small Growth Villages feedback suggested that the identified small villages remained unsuitable locations for growth as there is no local demand and limited employment or services. There was, however, strong support for the provision of affordable housing in such villages. Many considered that allocating development in Small Growth Villages would have a knock on impact on the delivery of rural exception affordable housing schemes. Development on small

suitable infill plots was, however, generally supported. On the other side, some considered that growth in the Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites and that other settlements should also be promoted.

3.8 Comments from **Statutory bodies and organisations** (28) were mixed. Key issues raised included:

- The requirement that site selection should be informed by SA and HRA and have high regard to the landscape;
- The small village requirement of policy SD3 (400) increased and an allowance for residential growth to come forward adjoining or close to the existing confines of a settlement. i.e more flexible approach;
- More certainty through less reliance on windfall;
- Concern regarding the impact of estate housing;
- Those representing the larger agricultural estate management sought greater flexibility that could allow for the facilitation of estate growth such as, but not limited to and key worker accommodation.

3.9 Please note members of the working party have previously received a printed copy of the Schedule of Representations Summary Document and the full Schedule of Representations is available in the Members Room along with commentary on the Local Plan Portal.

### **National Policy**

3.10 The revised National Planning Policy Framework, NPPF was published in February 2019 and the Planning Practice Guidance, PPG, on line resource provided guidance on its implementation. Such policy, along with guidance contained in the PPG, lead to the production of the policy approach consulted on and is reviewed in more detail in Background Paper No 2.

3.11 Briefly, the NPPF states that: *planning policies and decisions should enable, the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship* para 83.

And

3.12 *In order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. 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.* Para 78.

## **4 Identification of Small Growth Settlements**

4.1 The 23 settlements identified in the regulation 18 version of the Plan as Small Growth Villages were selected on the basis of their social and economic sustainability in terms of their level and accessibility of services and facilities. The settlements have been reviewed in line with the services/facilities methodology as established within Background Paper 2 – Distribution of Growth and the feedback

from the consultation. The full review is set out in Appendix 1 which also contains a summary table.

- 4.2 **Consultation Feedback:** A number of individual comments, along with the Parish Councils of Bacton & Edington, High Kelling, Roughton, Southrepps and Weybourne, expressed a desire not to be identified as a Small Growth Villages (see summary of comments within Appendix 3) for various reasons, including preference for exception site development, impacts on existing character & infrastructure. It is confirmed that these settlements do meet the requirements of the methodology set out in Background Paper 2: Distribution of Growth to be identified as Small Growth Villages. It is important for the emerging Plan to have a strategic and consistent approach and consequently, decisions need to be made and justified by this established methodology. Whilst the concerns raised within the consultation comments are acknowledged, it is considered that these comments do not alter the wider strategic identification of these settlements as Small Growth Villages. As such, it is recommended that these settlements remain as Small Growth Villages.
- 4.3 Conversely a number of comments suggested that, the settlements of Bodham, Edgefield and Northrepps should qualify as Small Growth Villages. Both the settlements of Bodham and Northrepps were identified as part of the Initial Sift (Stage 2) of the methodology set out in Background Paper 2. This revealed that Bodham did not have any key services (school, convenience shop or GP surgery), which meant it was rejected and that Northrepps did not have the requisite 4 secondary or desirable services and so was also rejected at this stage. These two settlements have been reviewed in light of consultation comments and it is confirmed that the level of services remains below the threshold of services/ facilities needed and as such, they do not meet the requirements to be identified as a Small Growth Village.
- 4.4 The settlement of Edgefield was not included within the Initial Sift (Stage 2 of Background Paper 2) and so an assessment has been carried out in accordance with the methodology. This has concluded that the settlement of Edgefield does not have any key services (one key service is required of either a school, convenience shop or GP surgery) and consequently it does not meet the criteria to be identified as a Small Growth Village.
- 4.5 Feedback identified that the village of Langham does not contain the required level of services/ facilities, as set out in the methodology, to be considered as a Small Growth Village and consequently it is recommended that Langham is removed from the list of Small Growth Villages.
- 4.6 **Constraints:** The review has highlighted that although the identified settlements meet the service criteria to be Small Growth Villages, the potential for a number of settlements to contribute to future growth is likely to be constrained for environmental reasons. It should be noted that Sea Palling meets the service requirements of the methodology, but was previously removed from the list of Small Growth Villages, due to its location being entirely within Flood Zone 3A. Two other settlements of Potter Heigham and Walcott have also been identified as constrained settlements. The majority of the village of Potter Heigham is located within Flood Zones 2 and 3A. This constrains the village, with only the northern extent of the settlement situated in Flood Zone 1. Taking climate change into account, the majority of the settlement of Walcott is constrained by flood risk (falling within Flood Zones 2 and 3A), with only pockets to the southeast of the village within Flood Zone 1. Walcott's coastline is entirely within the Coastal Change Management Area, CCMA, this encompasses a large amount of the built form.

- 4.7 All three settlements meet the service/ facilities requirements to be identified as Small Growth Villages, but the extent of flood risk and CCMA to these three villages, particularly when factoring in climate change, is significant enough to acknowledge that their ability to contribute to the delivery of future growth is uncertain. Therefore, it is recommended that they are identified as Constrained Small Growth Villages, where growth could take place subject to compliance with national and local policy but any such growth should not be relied upon to meet strategic housing needs of the Local Planning Authority.
- 4.8 Horning continues to have restrictions on growth due to ongoing issues at Horning Water Recycling Centre (WRC), as it is over or very near to current permitted capacity. The Council has signed a Joint Position Statement that will be updated through the final Infrastructure Position Statement, IDP. Anglian water has undertaken investigations and identified investment priorities in order to manage the rising nutrient loads into the River Bure through works at Knackers Wood WRC. Given that additional future capacity is expected within the plan period, it is considered that the settlement of Horning should remain as a Small Growth Village and contribute to the strategic needs of the District.
- 4.9 **Conclusion: identification of Small Growth Villages:** The following settlements are identified as Small Growth Villages: Aldborough, Bacton, Badersfield, Binham, Catfield, Corpusty & Saxthorpe, East Runton, Happisburgh, High Kelling, Horning, Little Snoring, Little Walsingham, Overtstrand, Potter Heigham, Roughton, Sculthorpe, Sea Palling, Southrepps, Sutton, Trunch, Walcott, West Runton and Weybourne.
- 4.10 The settlements of Potter Heigham, Sea Palling and Walcott are identified as Constrained Small Growth Villages, as their growth should not be relied upon for the strategic needs of the District, as indicated in the summary table in appendix 1.
- 4.11 Corpusty & Saxthorpe have an adopted Neighbourhood Plan (NP), in which two Priority Development Areas (PDA) for housing and one PDA for mixed residential and business use, have been allocated. It is considered that these sites will adequately account for the planned future residential growth of the settlement. It is considered that their identification within the Neighbourhood Plan does not prevent the settlement from being included as a Small Growth Village, as the settlement continues to meet the threshold of services/facilities required within the methodology.

## 5 Approach to Growth – Small Growth Villages

- 5.1 The NPPF requires that 'planning policies and decisions should actively manage patterns of growth to make the fullest use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- 5.2 The Local Plan includes a settlement hierarchy, with site allocations being included for settlements in the top three. For these 12 settlements, which include the larger villages, market towns and principle growth towns, there is a specific focus and degree of certainty provided about the specific sites that will be developed in each of these locations during the plan period. Policy SD3 also required that a minimum of 400 homes are delivered across a number of smaller villages.
- 5.3 Although reduced, these smaller villages also provide a level of service provision, and as such policy SD3 seeks to deliver a minimum of 400 homes across a wider geographic area partly to ensure villages remain vibrant and thriving communities, and partly in order to provide choice and flexibility to those living in the rural hinterland.

- 5.4 Although 209 sites have been put forward across the identified Small Growth Villages<sup>3</sup>, in order to select allocations it would be very difficult to undertake a detailed assessment of what the appropriate level of growth would be for each of the smaller villages taking into account the distinct constraints and opportunities of every settlement. There is also not one suitable growth figure that could be applied to every settlement, given that every settlement is distinct. Some have large tracts of land at risk from coastal flooding and or are located in the Coastal Change Management Area while others have infrastructure issues, which may be overcome in the plan period. All add to uncertainty around delivery.
- 5.5 A revised approach is proposed for the delivery of growth in the small growth villages** based on a more flexible approach, equitable distribution and criteria approach delivered through market forces. In line with the historical delivery it is considered appropriate for the revised approach building on consultation feedback to seek a ceiling of 6% growth for those villages identified as Smaller Growth Villages. This would be in line with the target set but allow for potential growth.
- 5.6 With such an approach, Small Growth Villages will not receive specific allocations but each location will see development in line with revised settlement boundaries. In general terms inside a settlement boundary the principle of new development for market housing is deemed acceptable. As such the approach is one that allows for organic growth through infill development on brownfield and suitable greenfield and through with appropriate development on land immediately and functionally adjoining to the settlement boundary, but at a scale and design appropriate to the location and particular settlement where:
- 5.7 It would not lead to the number of dwellings in any of the selected Small Growth Villages increasing by more than 6% from the date of adoption of the Plan<sup>4</sup>. Unless it was through exception development and of additional growth identified through neighbourhood planning or through other rural policies.
- Although completions and commitments may change as the plan nears submission, collectively growth within this tier of the hierarchy should represent no more than 10% growth;
  - The design of the scheme contributes to preserving and enhancing the historic nature of communities, including local connectivity in the village and wider GI networks;
  - It remains positively prepared introducing an element of flexibility and competition.
- 5.8 The amended policy can be seen in Appendix 2
- 5.9 Settlement boundaries in these rural settlements will be reviewed through the application of the criteria based approach including, and in broad conformity reflecting the below:
- Recent planning approvals;
  - Infilling and rounding off opportunities;

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<sup>3</sup> As identified at Regulation 18 stage

<sup>4</sup> This is to establish that the plan remains positively prepared. Backdating to start of plan period may result in no planned levels of growth as current proposals may absorb growth allowed.

- Adjoining small scale<sup>5</sup> brownfield sites;
- Environmental constraints.

The total number of dwellings will then be counted and used as a base date to inform the future policy approach, updating the current evidence base – the 2011 census data.

- 5.10 Outside the identified villages it is not desirable to identify development boundaries or proportion growth and it remains the case that these villages and hamlets will be identified as “Countryside” and fall under SD4, development in the Countryside and the suit of policies as set out above. These villages and hamlets are of a small scale, have little to no services, often more sporadic in nature, and or remote.
- 5.11 The approach is in line with the broad support and approach outlined in SD3, and reflects the policy ambition to deliver approximately 10% of growth across the small growth villages. In doing so the approach helps to address the requirement to ensure an adequate supply of sites of appropriate scale and distribution earlier in the Plan period.
- 5.12 Overall the approach provides greater flexibility than site allocations but at the same time ensures that:
- The Plan meets the requirement of policy SD3 of 400 dwellings and provides some level of growth in more rural locations in order to support local services and enhance the rural economy, thereby helping to maintain the viability of rural communities;
  - Adds a level of locally distinctive approach to sustainable development that is appropriate for North Norfolk;
  - Delivers affordable housing in line with policy percentages;
  - Delivers a criteria approach to growth allowing for a more equitable distribution than allocations would bring;
  - Allows developer interests to be promoted in accordance with the Plan as a whole ensuring early delivery and helping with future land supply calculations;
  - Seeks to address NPPF para 68 requirements of small site provision Supports smaller developers;
  - Windfall development is not compromised and the scale of development is limited in each location and collectively over the whole tier;
  - Allows for those communities that wish to identify additional allocations through Neighbourhood planning and through policy SD2 based on community support;
  - Gives communities developing neighbourhood plans a base housing target as required by the NPPF;
  - Complements the suit of policies that deliver the positive policy framework in the Local Plan with regard country side development and windfall growth;
  - Provides another source of self-build supply required through national policy;

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<sup>5</sup> new site not larger than one hectare

- 5.13 Outside the growth limits allows local communities and Housing providers to identify and bring forward additional sites for affordable housing through exception site development in order to address identified local needs.
- 5.14 In doing so it is recommended that the proposed cap on settlement size (5% detailed in bullet 4 of HOU4 Affordable Homes in the Countryside (rural exception site development) be removed. Exception site development should be based on need based on at the local level (parish and surrounding) and should not be restricted.

## **6 Flexible & Exception Growth**

- 6.1 The following section of the report reviews policies SD4, SD2, HOU3, SD6, HOU5, & HOU4. For each policy the updated policy wording is detailed in appendix 2. A summary of the relevant consultation feedback is contained in Appendix 3.
- 6.2 **Policy SD4.** No substantial issues were raised during the consultation with the prevailing view being that growth should only be supported in the countryside in order to meet identified need and that the approach taken was the right approach with regard to sustainable development in North Norfolk.
- 6.3 Norfolk County Council Minerals and waste team requested the removal of bullet 2 It is proposed to remove bullet 2 in line with Minerals and Waste team and for clarity link bullet 4 to HOU4 adding certainty around the application of key workers in relation to functionally linked to the land and also allowing a more flexible approach with rearguard agricultural worker's accommodation needs on the larger estates.
- 6.4 **Policy SD2.** The policy received very limited comment. The principle of community led development (through neighbourhood plans) was generally supported by those that did respond. Clarification was sought on the extent of community support with some organisations seeking amendments to the approach around the inclusion of estate masterplans, greater recognition and endorsement of market housing in rural areas, recognising the contribution to sustainable development and the use of housing needs assessments in demonstrating need, and hence support in rural areas. Minor amendments are proposed to add clarity and to ensure continuity/consistency with other policies such as HOU3 and HOU6.
- 6.5 **Policy HOU3.** The policy received limited feedback with the majority supporting the approach and rising no substantial issues. The policy actively supports the provision of affordable housing as an exception to policies in the Local Plan in order to address and provide for a local identified need. The policy provides a consistent approach across the District. The removal of bullet 4 is proposed in line with para 5.15 above so provision is aligned with need. In order to align better with the Council's Housing strategy adjacent is changed to adjoin in the last paragraph. Clarity is proposed to be added around the approach to market housing in the supporting text.
- 6.6 **Policy SD6.** No substantive comments were received in relation to this policy. Further clarity was sought as to the identification of such site and they will be identified through the submitted policies map. Although pubs are identified as important local facilities for which the policy applies one comment requested amending the policy in order to make it more difficult to change between Use Class, specifically in relation to Public housing. Legislation already exists through the Localism Act that allows communities to identify Assets of Community Value which allows a community the right to bid if such an asset becomes available. Minor amendments to the policy are proposed for reasons of clarity.

- 6.7 **Policy HOU5.** The accommodation needs of Gypsies and Travellers should be considered alongside the housing needs of the whole community. Norfolk Caravan and Houseboats Needs Assessment 2017 identified an annualised requirement for 0.4 pitches between 2017 and 2022 and a pitch requirement of 8 up to 2036. The approach through a criteria led policy remains the most appropriate given this low level of need. Minor amendments are proposed for reasons of clarity and to align the policy approach to the wider sustainable development approach envisaged by the Local Plan.
- 6.8 **Policy HOU4.** The policy received limited feedback from the consultation, of which was in general support of the policy. One comment expressed a desire to extend the policy to cover other types of key workers within towns, but it should be highlighted that the point of policy HOU4 is to assist with providing residential accommodation to those in essential need in areas that are likely to otherwise be unsustainable. It is proposed to amend the policy slightly to align it with policy HOU7 (re-use of rural buildings in the countryside) to ensure that the conversion of an existing building is considered before new build. Specific reference to environmental impact is not considered to be required as any proposal would need to satisfy other relevant policies, such as Policy ENV2 – Protection & Enhancement of Landscape & Settlement Character.

## 7 Recommendations

1. **It is recommended that members endorse the changes to the list of Small Growth Villages.**
2. **It is recommended that members endorse the revised approach and delegate responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

### Options

**There are three options available for consideration**

- Option 1: Members endorse the revised approach.**  
**Option 2: Members do not endorse the revised approach.**  
**Option 3: Members provide support for the revised approach and provide further direction**

## 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 policy approaches must be justified and underpinned by evidence, the application of a consistent methodology and take account of public feedback.
- 8.2 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.
- 8.3 By applying a consistent methodology base around service provision, irrespective of critical constraints, there is a risk that settlement boundaries in all of the settlements may not be identified and that growth may not come forward. This is mitigated by the proposed approach which identifies settlements based on services but then does not rely on a requirement coming forward in the settlements where in the main, environmental constraints could significantly restrict growth - as detailed in table 1.

8.4 The approach delivers on SD3 commitments but allows a degree of flexibility and competition, although less certainty than allocations it still allows for exception site development and growth for local homes in respect of identified local need. The policy wording, is designed to be more specific over the location of sites in relation to a settlement boundary than that used in the rural exception policy and the approach no longer seeks to limit settlement size through exception growth but link such growth to that of community need.

## 9 **Financial Implications and Risks**

9.1 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**

Appendix 1 – Small Growth Village Review

Appendix 2 – Policies Review

Appendix 3 – Regulation 18 Consultation Feedback Summaries.