

# North Norfolk Local Plan Examination

## List of Matters, Issues and Questions

Issued on 3 November 2023

### **Matter 1: Duty to co-operate, other legal requirements, habitats regulation assessment & plan period**

Issue: Whether the Council has complied with the duty to co-operate and other legal requirements, and whether the plan period is consistent with national policy.

Questions:

#### 1.1 Duty to Co-operate:

- (i) What are the strategic matters dealt with by the plan to which the duty applies and which other authorities and organisations are affected by them?
- (ii) For each strategic matter, how has the engagement been carried out, what has been the outcome and how has this addressed the strategic matter?
- (iii) Specifically, prior to submission of the plan, did the Council engage constructively, actively and on an on-going basis with Norfolk County Council and Broadland District Council regarding the transport effects of the proposed growth of North Walsham, and in particular the potential effect on the radial routes into Norwich? What is the evidence for this engagement and what were its results (as at the time of submission, because the duty to co-operate must have been met prior to submission and cannot be rectified afterwards).
- (iv) Overall, has the Council engaged constructively, actively and on an on-going basis with the relevant bodies in maximising the effectiveness of the NNLP in relation to the strategic matters? Has the duty to co-operate thus been met?

1.2 Has the preparation of the plan complied with the 2004 Planning and Compulsory Purchase Act and the relevant regulations?

1.3 Has the preparation of the plan complied with the Council's Statement of Community Involvement?

1.4 Is the plan compliant with the Council's Local Development Scheme?

1.5 Have the likely environmental, social and economic effects of the plan been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the spatial strategy of the plan and the distribution of housing and employment land?

1.6 Does the Habitats Regulations Assessment (with the August 2023 addendum) identify the likely significant effects of the plan on the various European nature conservation sites and carry out the necessary appropriate assessment? In relation to each impact pathway and each affected site, are suitable and effective mitigation measures put forward, what are these and how will they be secured? Which policies of the plan

secure the necessary mitigation and are further modifications required? Does English Nature agree with the HRA findings?

- 1.7 In relation to recreation effects, does Policy ENV5 and the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS) ensure the necessary mitigation and is this strategy effective?
- 1.8 In relation to water quality and nutrient neutrality, does Policy CC13 (as proposed to be modified) ensure the necessary mitigation and will this be effective? On the basis of current legislation, what practical effect will this have on the implementation of the plan and the cost of development? What progress is being made to develop mitigation solutions and when might the embargo on small developments in the affected areas be lifted?
- 1.9 Does the plan include policies designed to ensure that the development and use of land in North Norfolk contributes to the mitigation of, and adaptation to, climate change in accordance with Section 19(1A) of the 2004 Act? Which in particular address this?
- 1.10 Has the preparation of the plan complied with the Public Sector Equalities Duty? Does the Equality Impact Assessment demonstrate this?
- 1.11 Should an Appendix 6 be added to the plan to make explicit which policies are strategic policies (NPPF paragraph 21)? Does the list in in Background Paper 12 satisfy this requirement?
- 1.12 With adoption hopefully sometime during 2024, does the plan look ahead for a minimum 15-year period from adoption? (NPPF paragraph 22). If not, should the plan period be extended to 2039 or 2040? The implications of this would be discussed under other matters as appropriate. If so, should the base date of the plan be moved forward to 2019 or 2020 to give a 20 year plan period?

## **Matter 2: Spatial Strategy (SS policies)**

Issue: Whether the spatial strategy of the plan is positively prepared, justified, effective and consistent with national policy as a suitable basis for planning the development of the district.

Questions:

- 2.1 Is the proposed settlement hierarchy with five categories - Large Growth Towns, Small Growth Towns, Large Growth Villages, Small Growth Villages and Countryside - justified by the evidence?
- 2.2 How does the settlement hierarchy compare to that in the 2008 Core Strategy? How are the proposed changes justified or explained?
- 2.3 Does the evidence justify the inclusion of the particular settlements in each of the top three tiers – Large Growth Towns, Small Growth Towns and Large Growth Villages? Is the distinction between Large Growth Villages and Small Growth Villages distinct or have any been misclassified?
- 2.4 How has the proportion of new development in Large Growth Towns (about 50% of the total) been derived? Is this a 'top down' policy decision or the consequence of assessing site opportunities? How have the lower proportions of development in Small Growth Towns and Large Growth Villages been derived, and do these proportions suitably reflect the relative sustainability of the settlements?
- 2.5 What criteria have been used to define settlement boundaries, and have these been consistently applied? (Any site-specific issues will be dealt with settlement by settlement).

### **Small Growth Villages**

- 2.6 Does the evidence justify the inclusion of the villages in the Small Growth Village category? How does the list compare with the designated service villages in the 2008 Core Strategy, and how are any changes justified or explained?
- 2.7 Should any further villages be included in the Small Growth Villages list due to their size, their suitability for minor development, to support existing services or for consistency? e.g. Langham, Edgefield, Beeston Regis
- 2.8 For effectiveness, should sites for development be allocated on the edge of Small Growth Villages, or settlement boundaries expanded, rather than inviting individual applications without further policy guidance?
- 2.9 In the Small Growth Villages, what is the justification for an 'allowance' of 6% growth in dwellings as opposed to a different figure? Is it justified for this figure to be cap on development, to include infill development, and to operate a 'first come first served' approach as set out in Appendix 4? Given the possible uncertainty, how reliable are the 452 dwellings planned to come forward under this policy?
- 2.10 Are the criteria for development outside defined settlement boundaries in section 3 of Policy SS1 justified and would they be effective? Is the requirement for proposals to

incorporate substantial community benefits justified and for sites in excess of 0.25 ha to be offered to registered social landlords first?

- 2.11 Are there any village specific issues, eg scale or location of growth or detailed definition of settlement boundaries:
- a) Aldborough
  - b) Badersfield (Scottow)
  - c) Bacton
  - d) Binham
  - e) Catfield
  - f) Corpusty & Saxthorpe
  - g) East Runton
  - h) Happisburgh
  - i) High Kelling
  - j) Horning
  - k) Little Snoring
  - l) Little Walsingham (Walsingham)
  - m) Overstrand
  - n) Potter Heigham
  - o) Roughton
  - p) Sculthorpe
  - q) Sea Palling
  - u) Southrepps
  - v) Sutton
  - w) Trunch
  - x) Walcott
  - y) Weybourne

#### Policies SS2 & SS3

- 2.12 Are Policies SS2 and SS3 positively prepared, justified, effective and consistent with national policy?
- 2.13 Would limited infilling/rounding off, to be defined, be justified in villages or hamlets not defined as Small Growth Villages and without settlement boundaries?

### Matter 3: Delivering Sufficient Homes (Policy HOU1)

Issue: Whether the plan is justified, positively prepared and consistent with national policy in relation to the overall provision of housing.

- 3.1 Attention is drawn to the report 'The Possible Impact of Second and Holiday Homes in North Norfolk' (Document E4). Should the prevalence of second and/or holiday homes in North Norfolk have any bearing on the quantity of housing that should be provided in the district over the plan period, and if so, how? Would occupancy restrictions be justified on new market housing in some areas or some circumstances? Should a policy be included in the plan on the basis that controls on the change of use to second or holiday homes may be introduced in future?
- 3.2 Is the approach in Policy HOU1 of counting elderly persons accommodation on allocated sites 'at a ratio of each 1.5 units... being equivalent to a single dwelling' (paragraph 7.1.11) justified and consistent with national policy? Should this just refer to Use Class C2 (residential institutions) with specialist elderly persons accommodation in Use Class C3 (dwelling houses) counted individually? Can the Council itemise how the numbers in the column are made up?

Attention is drawn to the Inspector's initial questions in a letter dated 26 June 2023 (EXAM 002) and the Council's substantive reply with updated housing monitoring information dated 27 September 2023 (EXAM 006). **The updated housing monitoring information as at April 2023 should be used when preparing hearing statements.**

- 3.3 Is the Council's bespoke variation to the standard method for calculating local housing need, using the 2016 based household projections and arriving at a figure of 480 dwellings per annum (dpa), 9,600 dwellings over a 20 year plan period, justified and consistent with national policy? Is it based on realistic assumptions of demographic growth? Is there robust evidence of exceptional local circumstances that might justify the alternative approach, and how unique are these to North Norfolk?
- 3.4 Should the standard method based on 2014 based household projections and the affordability uplift at the publication of the submission version of the plan be used<sup>1</sup>, giving 531 dpa or 10,610 dwellings over a 20 year plan period? Should a more recent affordability uplift figure be used<sup>2</sup>? Should the ratio to be published in March 2024 be taken into account? What are the likely future trends in relation to house prices and average earnings locally?
- 3.5 How much weight, if any, should be given to the reasoning behind Section 78 appeal decisions which support the Council's approach? Which decisions are relevant?
- 3.6 If there are exceptional circumstances justifying use of a non-standard approach, should the 2018 based projections be used as more up to date than the 2016 based projections? What should the dpa figure be then? If the 2016 rather than 2018 based projections are to be used, what would be the justification for this?
- 3.7 Would it be appropriate to increase the housing need figure for the district to take account of economic growth strategies, infrastructure improvements, to address the

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<sup>1</sup> The 2020 ratio – 9.14

<sup>2</sup> 2021 ratio – 11.61 or 2022 ratio 10.64

need for more affordable housing or to provide for the unmet needs of neighbouring local authorities?

- 3.8 Are there national policies that protect areas or assets of particular importance in the district that provide a strong reason for reducing the overall provision of housing in the plan below the housing need figure (NPPF paragraph 11b)? If so, is this conclusion supported by the Housing Land Availability Assessment, and have discussions taken place with neighbouring authorities to seek to address the unmet needs?
- 3.9 Given the local housing need figure for the plan period, however assessed, what level of housing provision should be made in the plan to take account of unforeseen circumstances such as allocations or planning permissions not being implemented, or completions on allocated sites being slower than currently anticipated? On the basis of the Council's local housing need figure of 9,600 dwellings, is the provision of 10,968 dwellings for 2016-36 or 10,633 for 2020-40 appropriate? (Updated HOU1 figures in EX006)
- 3.10 Given the updated monitoring figures in EX006, if the local housing need is assessed as 10,610 dwellings or some other figure, what level of provision would be appropriate for 2016-36 or 2020-40?
- 3.11 Should the number of dwellings with deliverable planning permission at 31.3.23 in Policy HOU1 be reduced to take account of potential non-implementation? If so, by how much?
- 3.12 How has the contribution of future windfall sites been calculated? What is the evidence for the past level of delivery from windfall sites? Should the past contribution be discounted by 50% (paragraph 7.1.7) or some other figure? Why?

## **Matter 4: Delivering the Right Mix of Housing (Policy HOU2)**

Issue: Whether the policies of the plan are justified, effective, positively prepared and consistent with national policy to deliver the right mix of housing.

### Affordable Housing

- 4.1 Is the need for about 2,000 affordable homes over the plan period (paragraph 7.1.5) justified by the evidence, what types are required within this total and would the policies of the plan ensure satisfactory delivery?
- 4.2 Is the proposal for 15% of dwellings on qualifying sites to be affordable in housing zone 1 and 35% in housing zone 2 justified by the evidence, and has the effect on viability been properly assessed?
- 4.3 How does this policy compare to the existing policy for the provision of affordable housing on large sites, and how are any changes justified or explained?
- 4.4 Are the two housing zones, and the boundary between them, justified by viability or other evidence?
- 4.5 How would the policy requirement for 'at least' 15% or 35% be interpreted and applied, and the statement in paragraph 7.2.5 that the Council will seek to deliver the highest proportion of homes that is viable. How will this be established and does this provide sufficient clarity for the policy to be effective?
- 4.6 Is the required affordable housing mix for 25% of affordable housing to be first homes and the remainder rented in a mix of one, two and three bed with the majority two bed justified by the evidence of local need, consistent with national policy and has its effect on viability been properly assessed? With 15% or 35% affordable housing, is the policy consistent with national policy for 10% of the total number of homes on large sites to be for affordable home ownership (NPPF paragraph 65), and if not is any conflict justified?
- 4.7 Would it be clearer to have a separate line in the policy for sites of 6-10 in the designated rural area? Is the policy overall sufficiency clear?
- 4.8 How would the alternative to on-site provision of a financial contribution on sites of 6-10 dwellings be assessed?

### Market Housing Mix

- 4.9 Is the required market housing mix on sites of 6 or more dwellings – not less than 50% two or three-bedroom properties in a mix comprising approx. 20% two-bed and 80% three-bed – justified by evidence of local need and has its effect on viability been properly assessed? Does this allow sufficient flexibility to meet locally specific needs?

### Custom & Self Build Housing

- 4.10 Is the requirement on sites of 26 dwellings/4 ha or more for at least one serviced self-build plot or 2% of the number of units (whichever is the greater) justified by the evidence, including the number of applicants on the Council's self-build register? How

would the requirement operate in practice to be sensitive to demand in any particular settlement over time and if the sites are not taken up?

#### Specialist Elderly/Care Provision

- 4.11 Is the requirement on sites of 151 dwellings or more for a minimum of 60 specialist elderly/care units and 40 units for each additional 250 dwellings thereafter justified by evidence of local need and has its effect on viability been properly assessed? Are these sized schemes appropriate, does this allow sufficient flexibility to meet locally specific needs and would the sites be appropriately located in all cases? Has this policy been carried through consistently in the proposed allocations in the plan? How would Class 2 residential care homes be assessed in terms of units?
- 4.12 What contribution would the site allocations make towards addressing the need for specialist elderly/care units in North Norfolk? What is the overall level of need for the different types of provision and how would the remainder be delivered? Should the requirement on large housing sites, perhaps greenfield in nature and peripheral to a settlement, be supplemented by a supportive policy for such development on more centrally located, brownfield sites? Would this assist provision in settlements without large housing sites?

## **Matter 5: Places & Housing Sites**

Issue: Whether the housing allocations, settlement boundaries and policy designations in the plan are justified and consistent with national policy and whether the site-specific policies for the allocations are effective.

### 5.1 General Questions:

5.1.1 Does the methodology set out in the Norfolk Housing and Economic Land Availability Assessment (HELAA - Documents D13-D16) represent a justified approach to housing land assessment in general terms? (site specific issues will be dealt with settlement by settlement)

5.1.2 (Particularly for the Council) Have all existing unimplemented housing allocations been brought forward into the emerging plan? If not, please list and give reasons.

5.1.3 (Particularly for the Council) What is the definition of the term units of elderly care accommodation, and how does this relate to the Use Classes C3 (dwelling houses) and C2 (residential institutions)?

5.1.4 In general terms, unless there are site specific issues, how have site capacities been estimated, both for dwellings and units of elderly care accommodation?

5.1.5 In general terms, unless there are site specific issues, how have the areas of public open space been calculated for each allocation?

5.1.6 Some allocations are affected by a defined Minerals Safeguarding Area and Policy CS16 of the Norfolk Minerals and Waste Core Strategy applies. What are the implications of this for the principle of development or for its timing, if any? Have the Minerals Planning Authority supplied site by site comments on these sites? If so, what are they?

### Standard Questions for each allocation:

- a) Has the site been allocated previously or is it a new allocation?
- b) Does the site have planning permission and/or are there current applications under consideration? If so please list.
- c) Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?
- d) Have the impacts and effects of development been properly taken into account?
- e) Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?
- f) What form would the public open space take?
- g) Having regard to these components, is the estimate of site capacity justified?
- h) What is the land ownership position and is the site currently being promoted by a developer?

- i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?
- j) Given the components of the proposal and the site requirements, would development of the site be viable?
- k) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

## **5.2 Cromer**

5.2.1 Are the detailed Settlement Boundaries for Cromer, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.2.2 Are the housing allocations for Cromer the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.2.3 Land at Cromer High Station, Norwich Road (C07/2)  
Standard Questions a) to k)

5.2.4 Former Golf Practice Ground, Overstrand Road (C16)  
Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

5.2.5 Land West of Pine Tree Farm, Norwich Road (C22/2)  
Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

## **5.3 Fakenham**

5.3.1 Are the detailed Settlement Boundaries for Fakenham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.3.2 Are the housing allocations for Fakenham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.3.3 Land North of Rudham Stile Lane (F01/B)  
Standard Questions a) to k)

5.3.4 Land adjacent to Petrol Filling Station, Wells Road (F02)  
Standard Questions a) to k)

5.3.5 Land at Junction of A148 and B1146 (F03)  
Standard Questions a) to k)

### 5.3.6 Land South of Barons Close (F10)

Standard Questions a) to k)

## 5.4 Holt

5.4.1 Are the detailed Settlement Boundaries for Holt, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.4.2 Are the housing allocations for Holt the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.4.3 Land North of Valley Lane (H17)

Standard Questions a) to k)

### 5.4.4 Land at Heath Farm (H20)

Standard Questions a) to k)

## 5.5 Hoveton

5.5.1 Are the detailed Settlement Boundaries for Hoveton, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.5.2 Is the housing allocation for Hoveton the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.5.3 Land East of Tunstead Road (HV01/B)

Standard Questions a) to k)

Extra Question l) As part of a larger field, how has the site boundary been determined?

## 5.6 North Walsham

5.6.1 Are the detailed Settlement Boundaries for North Walsham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.6.2 Are the housing allocations for North Walsham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.6.3 Land at Norwich Road & Nursery Drive (NW01/B)

Standard Questions a) to k)

### 5.6.4 Land West of North Walsham (NW62/A)

Standard Questions a) to k)

Given the importance of this site to the strategy of the plan, the Council should address the standard questions and any criticisms made by representors in extra detail.

5.6.5 What is the rationale for the western boundary of the allocation?

5.6.6 What is the vision for the western link road? Would it function as a town by-pass taking heavy goods vehicles away from the town centre? Given expected traffic flows, would suitable environment and connectivity between the housing on each side and the town centre be achieved? Would it include a northern extension over the railway to connect to Cornish Way, or a southern extension to the A149 south. Are these essential to the effectiveness of the road, and if so, would they be a requirement of developing the allocation? If not, how might they be funded?

5.6.7 What would be the impact of traffic generation on the wider area, for example through the village of Coltishall, what improvements or traffic management might be required if needed to mitigate the effects of the scheme, are these costed and deliverable and has any effect on viability been taken into account?

5.6.8 About 7 ha of the site in the Cromer Road/Bradfield Road area is intended for employment use. Is this the allocated area North of Cromer Road? For effectiveness, should this be allocated as such? Would its development be phased in relation to the housing, and/or a requirement of it?

5.6.9 How would the development of the site be phased, and would the traffic effects within the town be acceptable during each phase? How does the cost of the western link road affect the viability and deliverability of development?

## **5.7 Sheringham**

5.7.1 Are the detailed Settlement Boundaries for Sheringham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.7.2 Would a Settlement Boundary for Beeston Regis be justified?

5.7.3 Are the housing allocations for Sheringham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### **5.7.4 Land adjoining Seaview Crescent (SH04)**

Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

### **5.7.5 Former Allotments, Weybourne Road, Adjacent to The Reef (SH07)**

Standard Questions a) to k)

### **5.7.6 Land South of Butts Lane (SH18/1B)**

Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

Extra Question m) As part of a larger field, how has the site boundary been determined?

## **5.8 Stalham**

5.8.1 Are the detailed Settlement Boundaries for Stalham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.8.2 Are the housing allocations for Stalham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### **5.8.3 Land adjacent Ingham Road (ST19/A)**

Standard Questions a) to k)

Extra Question l) As part of a larger field, how has the site boundary been determined?

Extra Question m) Is the use of Grade 1 agricultural land justified?

### **5.8.4 Land North of Yarmouth Road, East of Broadbeach Gardens (ST23/2)**

Standard Questions a) to k)

Extra Question l) Is the delivery of 1 ha of employment land a fundamental part of the scheme, and if so is this a justified requirement?

Extra Question m) Is the use of Grade 1 agricultural land justified?

## **5.9 Wells**

5.9.1 Are the detailed Settlement Boundaries for Wells, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.9.2 Are the housing allocations for Wells the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### **5.9.3 Land South of Ashburton Close (W01/1)**

Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

### **5.9.4 Land Adjacent Holkham Road (W07/1)**

Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

Extra Question m) As part of a larger field, how has the site boundary been determined?

## **5.10 Blakeney**

5.10.1 Are the detailed Settlement Boundaries for Blakeney, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.10.2 Is the housing allocation for Blakeney the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.10.3 Land East of Langham Road (BLA04/A)

Standard Questions a) to k)

Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

Extra Question m) As part of a larger field, how has the site boundary been determined?

## 5.11 Briston

5.11.1 Are the detailed Settlement Boundaries for Briston and Melton Constable, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.11.2 Are the housing allocations for Briston and Melton Constable the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.11.3 Land East of Astley Primary School (BRI01)

Standard Questions a) to k)

Extra Question l) Does the requirement for school parking meet the tests in NPPF paragraph 57?

Extra Question m) Are Briston and Melton Constable considered to be two settlements, and if so is physical coalescence of settlements an issue?

### 5.11.4 Land West of Astley Primary School (BRI02)

Standard Questions a) to k)

Extra Question l) Does the requirement for school parking meet the tests in NPPF paragraph 57?

Extra Question m) Are Briston and Melton Constable considered to be two settlements, and if so is physical coalescence of settlements an issue?

## 5.12 Ludham

5.12.1 Are the detailed Settlement Boundaries for Ludham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.12.2 Are the housing allocations for Ludham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### 5.12.3 Land South of School Road (LUD01/A)

Standard Questions a) to k)

Extra Question l) As part of a larger field, how has the site boundary been determined?

### 5.12.4 Land at Eastern end of Grange Road (LUD06/A)

Standard Questions a) to k)

Extra Question l) As part of a larger field, how has the site boundary been determined?

## **5.13 Mundesley**

5.13.1 Are the detailed Settlement Boundaries for Mundesley, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?

5.13.2 Is the housing allocation for Mundesley the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

### **5.13.3 Land off Cromer Road & Church Lane (MUN03/B)**

Standard Questions a) to k)

Extra Question l) Does the requirement for a new pedestrian and cycle route that uses the former railway embankment meet the tests in NPPF paragraph 57?

## **Matter 6: Gypsy, Traveller & Travelling Showpeople's Accommodation (Policy HOU5)**

Issue: Whether the plan makes sufficient provision for pitches and plots to meet the needs of Gypsies, Travellers and Travelling Showpeople.

- 6.1 Is the Norfolk Gypsy, Traveller and Travelling Showpeople Needs Assessment (Document E3), dating from 2017, sufficiently up to date to provide the necessary evidence on which to base the plan? Should an updated assessment be carried out?
- 6.2 In the interests of effectiveness, should the numerical requirement for additional pitches and plots, however small, be set out in the plan?
- 6.3 Should an allocation(s) be made to meet the identified need? Alternatively, if a criteria-based policy is sufficient in the circumstances, are the criteria in Policy HOU5 positively prepared, justified, effective and consistent with national policy?

## **Matter 7: Housing Trajectory, Five Year Supply & HOU Policies 3,4,6-9**

Issue: Whether the overall housing trajectory is justified, whether a five-year supply of deliverable housing sites would be provided on adoption and whether housing policies 3, 4, 6-9 are positively prepared, justified, effective and consistent with national policy.

### Housing Trajectory

- 7.1 In the light of the site-by-site discussion, is the overall housing trajectory in the plan justified by the evidence? How has the trajectory for both large and small sites been affected by the need to secure nutrient neutrality and is this realistic?

### Five Year Supply

- 7.2 Does the plan provide for a five-year supply of deliverable housing sites on adoption (say April 2025 for this purpose) against the housing requirement if it is a) 480 dpa, b) 531 dpa or c) some other figure? Is an appropriate allowance made for windfall sites and the non-implementation of commitments, and if not, what should these be? Has the need to secure nutrient neutrality been sufficiently taken into account?

### HOU Policies 3,4,6-9

- 7.3 Are these HOU policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so, what should these be?
- 7.4 Should Policy HOU3 also allow for Entry Level Exception Sites and/or First Homes Exception Sites to be consistent with national policy? If any market housing is included in an exception site scheme, should occupancy be restricted to those with a local connection?
- 7.5 Should Policy HOU6 (and others) insist on compliance with the North Norfolk Design Guide when this does not form part of the plan?
- 7.6 In Policy HOU7, should the NPPF term redundant or disused buildings be used? Are the criteria in the policy justified? Should the test be a substantial proportion of the structural elements and existing fabric would be retained?
- 7.7 Are Policies HOU8 and HOU9 justified in relation to the evidence and their effect on development viability? In Policy HOU8(2), do both criteria have to be met or just one? In Policy HOU9, should a sentence to address possible exemptions be included as in Policy HOU8?

## **Matter 8: Employment Policies & Allocations**

Issue: Whether the plan is positively prepared, justified, effective and consistent with national policy in relation to the overall provision of employment land, employment policies generally and whether the proposed new allocations are justified and effective.

### **Employment Land – Policy E1**

- 8.1 Should the 6 ha Holt employment site be deleted from the plan on the grounds it is unavailable? If so, what are the implications of this for employment land provision? Is replacement land required, and if so, where?
- 8.2 Is the designation/allocation of 272.07 ha of land and allocation of 17.43 ha of new land as specified in Policy E1 (6 ha less if the Holt site is removed) justified and sufficient to meet identified employment needs in the district over the plan period 2016-36, including any necessary flexibility?
- 8.3 What would be the implications if the plan period were extended to 2020-40? In that scenario, should any further employment land be allocated?
- 8.4 Would the distribution of existing and allocated land across the district meet the needs of the various different settlements?

### **Employment Allocations**

- 8.5 Are the employment allocations in the plan the most appropriate when considered against reasonable alternatives in the light of the varying needs across the district, site constraints, infrastructure requirements and potential impacts?
- 8.6 For each allocation, please answer the standard questions set out in Matter 6 except those not relevant to employment sites.
- 8.7 Land East of Bradfield Road, North Walsham (2.4 ha): Are the proposed access arrangements justified and would they be effective? Would a new railway bridge be required, and would this be deliverable?
- 8.8 7 ha of the mixed-use allocation West of North Walsham: For effectiveness, should the 7 ha proposed for employment use be allocated as such? Is its development phased with, or linked to the housing in any way? Would the land north of the railway require a new railway bridge, and if so would this be deliverable?
- 8.9 What is the rationale for 1 ha of employment land within the Stalham allocation North of Yarmouth Road & East of Broadbeach Gardens? Which part of the site is envisaged for such use?
- 8.10 28.8 ha allocation at Tattersett Business Park: Are the restricted range of uses proposed for the site, and the requirement to demolish an equivalent amount of existing floorspace, justified?

## **Employment Policies E2-E9**

8.11 Are Policies E2 – E9 positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?

8.12 In Policy E2 is clause (1) to protect Employment Areas, Enterprise Zones, Employment Allocations and Mixed Use Allocations for employment use justified, consistent with national policy and would it be effective?

8.13 Are the criteria for new employment development in Policy E2 clause (2) justified and would they be effective?

8.14 Is Policy E2 clause (3) for employment generating uses on Former Airbases and in the Airbase Technical Areas justified and is the restriction on new floorspace justified? Should there be some flexibility to capitalise further on these sites?

8.15 In Policy E4 are the local impact thresholds justified?

8.16 Is Policy E6 too restrictive, unnecessarily constraining sustainable rural tourism?

## **Matter 9: Delivering Climate Resilient Sustainable Growth (CC policies)**

Issue: Whether the policies for delivering climate resilient sustainable growth are positively prepared, justified, effective and consistent with national policy.

Questions:

- 9.1 Are the CC policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?
- 9.2 Does Policy CC2 provide appropriate guidance for the consideration of Renewable & Low Carbon Energy projects in the district? Are areas classified as moderate-high sensitivity in the Landscape Sensitivity Assessment SPD suitable for development in principle as proposed, and is the assessment sufficiently detailed to determine this? Should moderate-high sensitivity or less be reflected in Figure 5, which appears to be solely based on AONB & Broads designations? Are the other criteria in the policy justified and would they be effective? Has potential windfarm development at the district's airfields been sufficiently assessed to justify the less restrictive policy?
- 9.3 How do the energy efficiency standards set out in section 1 of Policy CC3 relate to current and potential future building regulations? Does it need updating? Are any differences from building regulations standards justified? What does 'zero carbon ready' by 2035 mean in practice? What are the implications for the cost of development?
- 9.4 Is the requirement in section 2 of Policy CC3 for all proposals to be accompanied by a compliance statement justified? Does this include minor development or should there be a threshold?
- 9.5 Is the requirement in section 3 of Policy CC3 for non-residential development over 250 sq m floorspace to achieve BREEAM 'very good' standard justified? What are the implications for the cost of development?
- 9.6 Is the requirement in Policy CC4 for compliance with any future local water efficiency standard justified when these are not currently known?
- 9.7 Do Policies CC5 and CC6 provide appropriate guidance for the management of change and relocation of existing uses within the Coastal Change Management Area (CCMA)? Do they provide sufficient flexibility for tourist accommodation businesses operating within the CCMA? How reliable is the CCMA designation, what assumptions are made in drawing it up and when might it be reviewed? Is the vulnerable within 50 years period justified in relation to potential blight and investment decisions? Should it be more flexible or relate to the use concerned? Is the 'no net detrimental impact' test justified when the development being replaced remains temporarily?
- 9.8 Does Policy CC8 provide appropriate guidance for the provision of electric vehicle charging points in new development? Are the proposed standards justified, how do they relate to the building regulations and what are the implications for the cost of development? Is the text in 3.8.3 and 3.8.7 justified in requiring compliance with any future County Council electric vehicle parking standards when these are not currently known?

9.9 Is Policy CC10 relating to biodiversity net gain consistent with national policy? Does it need to refer to qualifying development? Should it refer to off-site and/or credit options? Has the effect on the cost of development been properly taken into account?

## **Matter 10: Delivering Well Connected, Healthy Communities (HC policies)**

Issue: Whether the policies to deliver well connected, healthy communities are positively prepared, justified, effective and consistent with national policy.

- 10.1 Are the HC policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?
- 10.2 Does Policy HC1 need to be clarified for effectiveness? Is a reduction in the threshold for an HIA to 250 dwellings justified? Should there be a threshold for non-allocated sites to be justified? In (1), how do the two sentences relate together? In (2), how is 'major development' defined?
- 10.3 Should Policy HC2 refer to the definition of major development in the NPPF rather than developments of 11 or more dwellings/1000 sq m? Are the open space requirements in Appendix 2 and Table 3 justified? How would financial contributions to off-site open space be calculated?
- 10.4 Is all the land designated as open/green land on the policies map and thus within the scope of Policy HC2(4&5) justified? Areas subject to objection include land at The Pastures, Blakeney, land at Hempstead Road & A148 Holt, land at Sheringham House and land off Warren Road, High Kelling. Are any other sites the subject of objection? Can the Council provide plans of these sites. Is the wording of sections 4 & 5` justified and effective?
- 10.5 Is the wording of Policy HC3 justified and effective? In Policy HC3(2b), should criteria (a) and (c) be combined for clarity and thus effectiveness? Should criterion (b) be strengthened to demonstrate alternative modes of operation are not viable? Is it justified for the footnote to require marketing to comply with best practice guidance that does not form part of the plan?
- 10.6 In Policy HC4(1a), is it justified to require compliance with infrastructure requirements set out in supplementary planning documents that do not form part of the plan? In 4b, is it justified to require the highest viable level of affordable housing? Should there be a reference to Policy HOU2 which sets out affordable housing requirements? Should 6 state proposals not accompanied by a viability assessment will be required to be policy compliant?
- 10.7 Does the Plan Wide Viability Assessment (Document I11) properly assess the impact of the policies of the plan on the economic viability of development so as to not undermine the deliverability of the plan? (NPPF paragraph 34) Does it properly assess the costs of development including affordable housing, biodiversity net gain, energy efficient standards, accessible & adaptable homes, minimum space standards, electric vehicle charging and digital infrastructure?
- 10.8 Is the requirement for a Digital Infrastructure Connectivity Plan in paragraph 5.5.3 to assess compliance with Policies HC5 and HC6 justified for all proposals over 100 sq m?
- 10.9 Is it justified for Policy HC7(4) to require compliance with the North Norfolk Design Guide when this does not form part of the plan?

10.10 Is all the land safeguarded by Policy HC8 clearly shown on the policies map? Should land between Walsingham and Wells, and at Wells, be included?

### **Matter 11: Environment (ENV policies)**

Issue: Whether the policies for the environment are positively prepared, justified, effective and consistent with national policy.

- 11.1 Are the ENV policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?
- 11.2 Should any specifically allocated major development sites in the AONB be an exception to the general presumption in Policy ENV1(3)?
- 11.3 In Policy ENV2(1,3 & 4), would it be justified to amend 'should' to 'must' as now suggested by the Council?
- 11.4 In Policy ENV3(1), should schemes specifically allowed by the local plan be listed as an exception?
- 11.5 Is it justified for Policies ENV 6 and ENV 8 to require compliance with the North Norfolk Design Guide when this does not form part of the plan?