

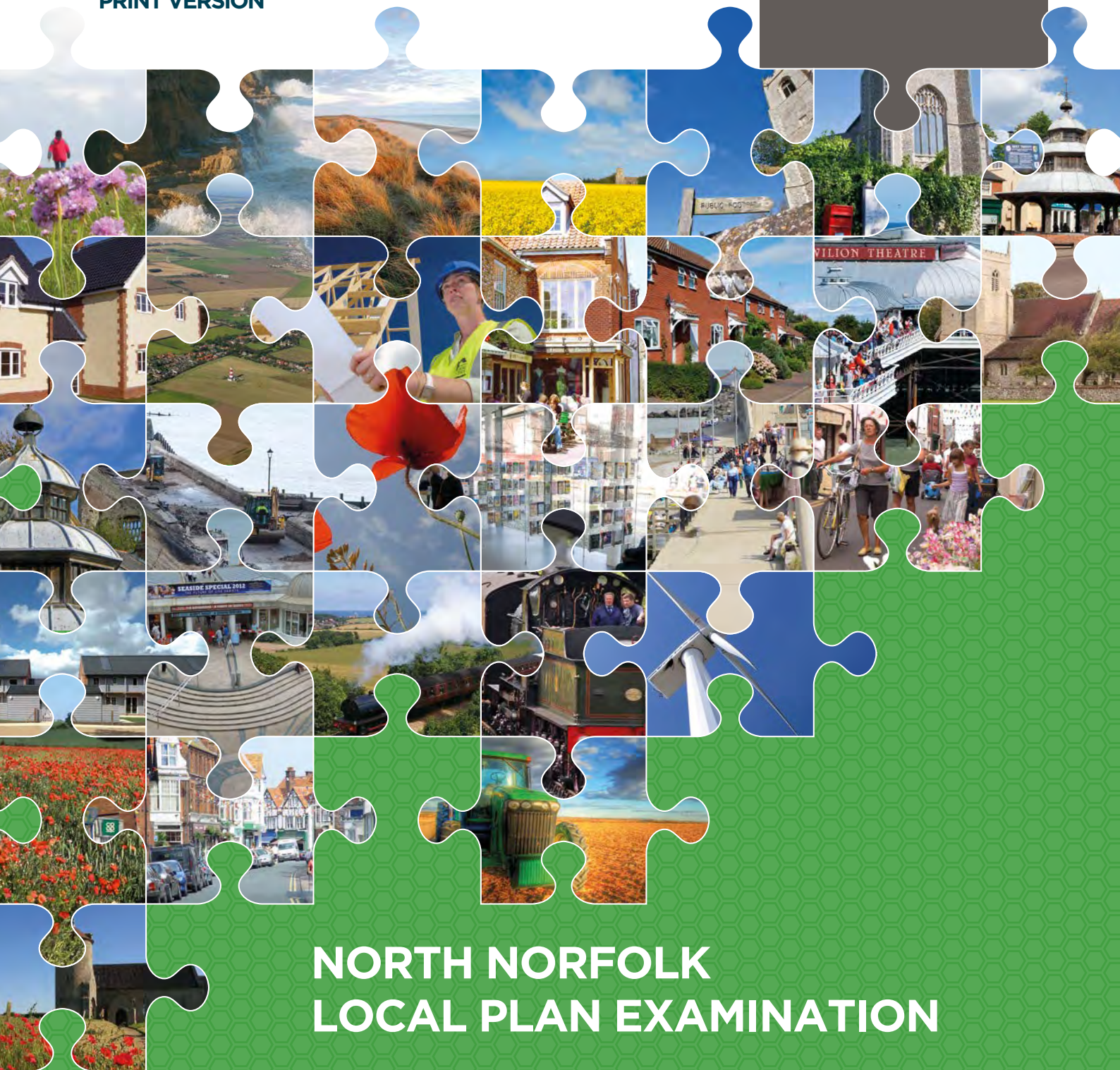
# North Norfolk Local Plan

2024-2040

PRINT VERSION



NORTH  
NORFOLK  
DISTRICT  
COUNCIL



## NORTH NORFOLK LOCAL PLAN EXAMINATION

### Further Consultation

(to address the Planning Inspector's interim findings)

Consultation period 6 November to 18 December 2024

[www.north-norfolk.gov.uk/localplan](http://www.north-norfolk.gov.uk/localplan)

## Important Information

### Document Availability

Please note that the documents referred to within this document can be viewed or downloaded at: [www.north-norfolk.gov.uk/examinationlibrary](http://www.north-norfolk.gov.uk/examinationlibrary). If a document produced by the Council is not available please contact us with your request.

All Council produced documents referred to can be viewed at North Norfolk District Council offices in Cromer during normal office hours.

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**All documents can be made available in  
Braille, audio, large print or in other languages.  
Please contact 01263 516318 to discuss your requirements.**

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# 1 Introduction

- 1.0.1** The purpose of this consultation is to publish and to seek feedback on a number of **Proposed Changes** to the submitted North Norfolk Local Plan, which is currently undergoing formal examination by an independent planning inspector.

## 1.1 Background

- 1.1.1** The Draft North Norfolk Local Plan was submitted to government for independent examination on 11 May 2023. The Plan is currently being examined by Mr David Reed, who was appointed by the Planning Inspectorate to determine if the Plan is sound, legally compliant and suitable to be adopted.
- 1.1.2** Stage 1 public hearing sessions were held between January and March 2024. Following this, the Inspector wrote to the Council on 24 May 2024<sup>(1)</sup>, and subsequently on 30 August 2024. In these letters<sup>(1a)</sup>, the Inspector highlighted three main concerns relating to soundness where he considered that changes would be required, and further consultation undertaken.
- 1.1.3** The main areas of concern are detailed below in 1.2 'Local Plan Examination: Interim Findings'.
- 1.1.4** The Inspector also outlined a number of additional changes which are not considered as 'main soundness issues'. These additional changes are not part of this consultation and will be available for comment at a future public consultation stage (known as 'Main Modifications'), following any further hearing sessions.
- 1.1.5** Details of the examination are available at [www.north-norfolk.gov.uk/localplanexamination](http://www.north-norfolk.gov.uk/localplanexamination)

## 1.2 Local Plan Examination: Interim Findings

- 1.2.1** In his interim findings<sup>(1a)</sup>, the Inspector set out **three main areas of concern** as detailed below. In responding to the interim findings, the Council has prepared additional documentation relating specifically to these areas of concern. The Inspector has requested that North Norfolk District Council undertakes public consultation on the following Proposed Changes to the plan, including a number of supporting documents:

**1. Shortfall in Housing Provision**

The Inspector identified an overall shortfall in planned housing provision in the Draft Plan. In order to address the shortfall and to provide flexibility in the delivery of new housing across the revised Plan period 2024-40, new site allocations, extended site allocations, and an increase in the indicative new housing allowance for Small Growth Villages are proposed.

See **Proposed Change 1-11** in Section 2 'Places & Sites'

See **Proposed Change 12-13** in Section 3 'Small Growth Villages'

1 This letter was held in abeyance due to the general election period of sensitivity and was released to the Council on 19 July 2024.

1a See 'Appendix 7: Inspectors Interim Findings Letter & Related Correspondence'

# 1 Introduction

## 2. Spatial Strategy: Small Growth Villages

The Inspector suggested that the approach to Small Growth Villages in Policy SS1 'Spatial Strategy' could be broadened to support additional growth, including that which allows rural areas to grow and thrive. The proposals to address the main areas of concern include identifying additional Small Growth Villages.

See **Proposed Change 12** in Section 3 'Small Growth Villages'

## 3. Gypsy, Traveller & Travelling Showpeople's Accommodation

Updating the Gypsy and Traveller evidence base to reflect the change in definition brought in in December 2023 and to bring forward any necessary changes to section 7.5 of the Plan that might arise from this updated evidence.

See **Proposed Change 14** in Section 4 'Gypsy, Traveller & Travelling Showpeople's Accommodation'

## 1.3 Overall effect of the Proposed Changes

**1.3.1** In para 47 of his interim findings letter<sup>(2)</sup>, the Inspector concluded that '*...the provision made by the submitted plan should be increased by at least 1,000 dwellings to allow some flexibility*'.

**1.3.2** If all of the Proposed Changes outlined in this consultation document are made to the Plan it will enable a minimum of **1,271 additional dwellings** to come forward over the Plan period 2024-2040. This is comprised of:

- **Site Allocations** (new and extended) - approximately **850** additional dwellings
- **Small Growth Villages** (new and existing) - approximately **421** additional dwellings

**1.3.3** A number of other sources of additional dwelling supply are expected to further increase the overall forecasted delivery of housing across the Plan period as detailed in correspondence contained in Appendix 7. These additional changes are not part of this consultation but are expected to form part of the anticipated Main Modifications publication, following any further hearing session(s)

## 1.4 Consultation

**1.4.1** We are inviting comments on the 14 **Proposed Changes** outlined within this document. The consultation is open for a six-week period beginning at midday on **Thursday 7 November** and closing at midday on **Thursday 19 December 2024**. It is important to note that this consultation is not inviting comments on other aspects of the draft North Norfolk Local Plan.

**1.4.2** Supporting the consultation are a number of background documents contained within the Appendices:

- 'Appendix 1: Additional Sites Review Background Paper'
- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'

- 'Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum'
- 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'
- 'Appendix 5: Sustainability Appraisal Addendum'
- 'Appendix 6: Habitat Regulations Assessment Addendum'
- 'Appendix 7: Inspectors Interim Findings Letter & Related Correspondence'

## Submitting comments

- 1.4.3** We want to hear from you if you either support or object to the Proposed Changes, or if you simply wish to make a comment.
- 1.4.4** It is important to make clear which Proposed Change or Supporting Document your comments relate to. Our online [Consultation Portal](#) allows you to navigate the document and to log comments in the relevant places.
- 1.4.5** Comments should be submitted at <https://consult.north-norfolk.gov.uk> and received by no later than midday **Thursday 19 December 2024**. All comments must be made on the specified Consultation Response Form. We are unable to accept representations which are received outside of the advertised consultation period.
- 1.4.6** Your representation will firstly be considered by the Council, and subsequently by the appointed Planning Inspector who is currently conducting an examination to determine if the Plan is sound, legally compliant and suitable for adoption.

## Viewing the documents

- 1.4.7** This consultation document, and all supporting documents, can be found in the Examination Library at [www.north-norfolk.gov.uk/localplanexamination](http://www.north-norfolk.gov.uk/localplanexamination)

## Information Points

- 1.4.8** Paper copies of the consultation document and the supporting documents are available to view on request at the following locations during normal opening hours:
- Libraries: Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham, Wells-next-the-Sea, Wroxham and Norwich (The Forum)
  - Council offices: Cromer, Fakenham

## Contact us

- 1.4.9** If you have difficulty submitting a representation, have particular accessibility requirements, or wish to speak to us on a related matter, please contact us:
- [planningpolicy@north-norfolk.gov.uk](mailto:planningpolicy@north-norfolk.gov.uk)
  - 01263 513811
  - Planning Policy, NNDC Council Offices, Holt Road, Cromer, NR27 9EN
  - Other ways to contact us can be found at [www.north-norfolk.gov.uk/contact-us](http://www.north-norfolk.gov.uk/contact-us)
- 1.4.10** If you wish to visit the Council offices to view the documents, we recommend making an appointment via the above 'contact us' web page.
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# 1 Introduction

## 1.5 Next Steps

- 1.5.1** Following close of the consultation, all responses will be considered by the Council and subsequently forwarded to the Inspector for consideration.
- 1.5.2** It is anticipated that further public hearing sessions will take place in early 2025 in order to allow for discussion on the Proposed Changes put forward in this consultation.
- 1.5.3** Further updates will be published at [www.north-norfolk.gov.uk/localplanexamination](http://www.north-norfolk.gov.uk/localplanexamination)



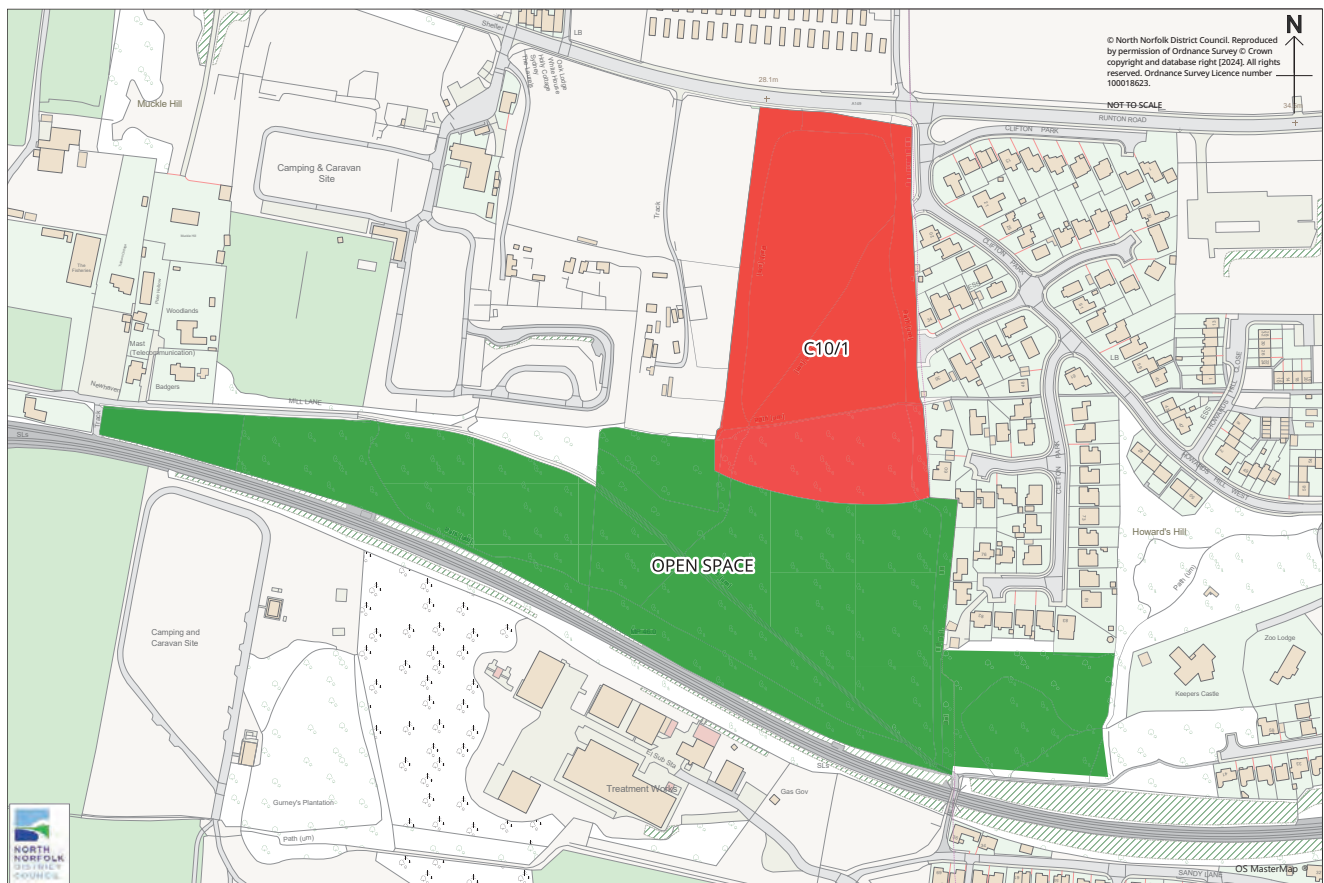
## 2 Places & Sites

### 2.1 Cromer: Land at Runton Road / Clifton Park (C10/1)

#### Proposed Change 1

#### New Site Allocation: Land at Runton Road / Clifton Park, Cromer

The following site is allocated for residential development of approximately 70 dwellings, public open space, and associated on and off-site infrastructure:



Land at Runton Road/Clifton Park (C10/1)

#### Description

- 2.1.1** The site is located to the west of the town and is bounded by residential development to the east, Runton Road to the north and a railway line to the south. The site is outside the Norfolk Coast National Landscape and gently slopes from the Runton Road up towards the railway and the start of the Cromer Ridge. There are good pedestrian and public transport links available.

#### Constraints

- 2.1.2** Development proposals will have to take into account:
- It is important that landscaping and an open, and stepped-back built frontage along Runton Road is provided to retain a green approach to the western side of the town. The site is

## 2 Places & Sites

adjacent to the Norfolk Coast National Landscape and consequently there should be suitable landscape treatment to the south of the site. The undulating landscape within the site and its impact on long-ranging views

- The amenity value of any local open space
- The railway line and Cromer Wastewater Recycling Centre lie to the south-west of the site and development of the site should have regard to the potential amenity impacts (noise and odours) arising from these uses.

### Deliverability

- 2.1.3** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. An area of indicative designated open space is identified on the Policies Map. Development should be achievable within the plan period.

### Draft Policy C10/1

#### Land at Runton Road / Clifton Park

Land amounting to approximately 8 hectares, as defined on the Policies Map, is allocated for development of approximately 70 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access from either Runton Road and/or the adjacent Clifton Park development;
2. Careful attention to site layout, design and building heights in order to minimise the visual impact of the development on long-ranging views from the National Landscape to the west;
3. Development should be located to the north of the site, and stepped-back from Runton Road to ensure an open frontage to the site;
4. High-quality landscaping should be provided to the rear of the built development and adjacent to the railway line;
5. Development should include the provision of approximately 5.3ha of designated open space, as identified on the Policies Map (with a focus on retaining and enhancing ecology and wildlife habitats), which should be retained in perpetuity;
6. The delivery of on-site multi-functional open space together with measures for its on-going maintenance, taking into consideration public access and visual amenity needs;
7. Development should have careful attention to form and site layout in order to appropriately mitigate the amenity impacts from Cromer Wastewater Recycling Centre;
8. Provision of new, and enhancement of existing pedestrian/cycle links throughout the southern area of the site with appropriate access to the built development, and connectivity with Clifton Park, Mill Lane, Fulcher Avenue, Sandy Lane, as well as north-south pedestrian access between the site and Clifton Park;
9. The submission, approval and implementation of a Surface Water Management Plan ensuring that there are no adverse effects on European sites and greenfield run off rates are not increased;
10. The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered prior to occupation of any dwellings; and,
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

## Places & Sites 2

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

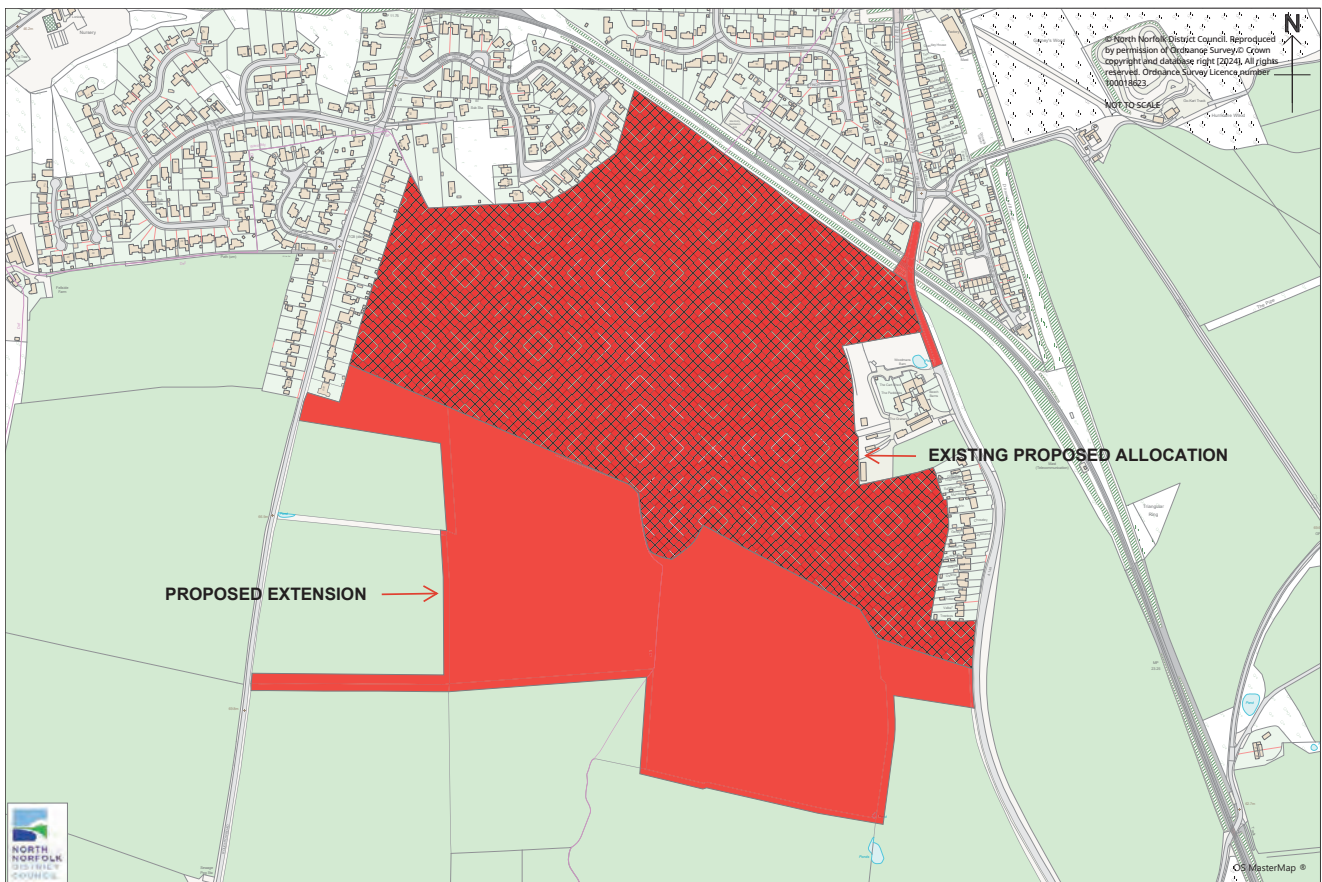
## 2 Places & Sites

### 2.2 Cromer: Land West of Pine Tree Farm (C22/4)

#### Proposed Change 2

#### Extended Site Allocation: Land West of Pine Tree Farm, Cromer<sup>(3)</sup>

The following site is allocated for a mixed-use development of approximately 500 dwellings, specialist elderly persons accommodation, sport and recreational facilities, public open space, and associated on and off-site infrastructure:



Land West of Pine Tree Farm (C22/4)

#### Description

- 2.2.1** This site is a combination of the existing proposed allocation C22/2, and an extended area to the south. The entire site is now referred to as C22/4. The combined site can deliver approximately 500 residential dwellings and 67 dwellings equivalent of specialist elderly persons accommodation, public open space and associated on-site and off-site infrastructure.
- 2.2.2** Access would be onto Norwich Road with two access points, including a roundabout on the southerly access.
- 2.2.3** The site is within the Norfolk Coast National Landscape and is visible from the south and the immediate surrounding landscape. Although clearly a significant development in the context of

3 It is recommended to refer to section 10 'Cromer' of the [Submission Version Local Plan](#) for context.



## Places & Sites 2

the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area.

- 2.2.4** Due to the topography of the site, the surrounding development and landscaping, the eastern section is not overly prominent in the wider landscape. The impact of development in this area would be mitigated by retaining existing hedges/ trees around the site, incorporating internal open space and tree planting within the site, and introducing a landscaped buffer to the southern boundary. The site is adjacent to the Grade II Listed Pine Tree Farmhouse along Norwich Road. The development layout and landscaping should consider the impact on the listed building and wider landscape.

### Constraints

- 2.2.5** Development proposals will have to take into account:

- The site would extend further into the open countryside and the National Landscape. To mitigate this, landscape buffering along the southern boundary and careful consideration of the design and layout of the entire site, especially for the extended area will be needed.
- Anglian Water advise that off-site water mains reinforcement will be required and enhancements to the foul sewerage network capacity may be required.
- Sports pitches and facilities are required on part of the site.
- A new roundabout access is required to Norwich Road.
- Safe pedestrian routes to schools, health and town centre facilities should be provided.

### Deliverability

- 2.2.6** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

### Draft Policy C22/4

#### Land West of Pine Tree Farm, Norwich Road

Land amounting to 44 hectares, as defined on the Policies Map, is allocated for development of approximately 500 dwellings, in addition to 67 dwellings equivalent of specialist elderly persons accommodation, sport and recreational facilities and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Unless alternative routes are agreed by the Local Planning Authority in consultation with the Highway Authority, the provision of a new segregated cycle/pedestrian footway along the Norwich Road including a dedicated footbridge (or suitable alternative) crossing over the railway;
2. Provision of two vehicle access points onto the A149. The provision of a roundabout at the southern access should be provided prior to occupation of dwellings on the site;
3. The submission, approval and implementation of a Transport Impact Assessment, to be publicly consulted on, to include analysis of the impact of the development on the local road network, including during construction, and to identify the mitigation and solutions that may be required;

## 2 Places & Sites

4. Careful attention to site layout, building heights and materials, with provision of landscape buffering along the southern boundary, in order to minimise the visual impact of the development on the Norfolk Coast National Landscape;
5. The provision of not less than 4.9 hectares of multi-functional open space together with measures for its on-going maintenance;
6. Unless alternatives are first agreed by the Local Planning Authority, the provision of land suitable for a sports pitch(es), the size and type to be agreed in consultation with the Local Planning Authority, plus an agreed contribution towards delivery;
7. Provision of additional green infrastructure on the site should be designed to maximise connectivity between the residential development and the open space. Biodiversity improvements and access should be provided to Beckett's Plantation and opportunities should be sought for its enhancement and connectivity with open space to the south;
8. Retention and enhancement of hedgerows and trees around and within the site including the protection of existing woodland within the site;
9. The existing public footpath through the site should be retained and upgraded to a surfaced route within in a green corridor and a new route should be provided from the site to connect with Roughton Road;
10. The submission, approval and implementation of a Surface Water Management Plan ensuring that there is no adverse effects on European sites and greenfield run off rates are not increased;
11. The submission, approval and implementation of a Foul Drainage Strategy, details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network;
12. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling, in accordance with the phasing strategy to be agreed for the site, to prevent detriment to the environment and comply with Water Framework Directive obligations;
13. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);
14. Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses;
15. Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping.

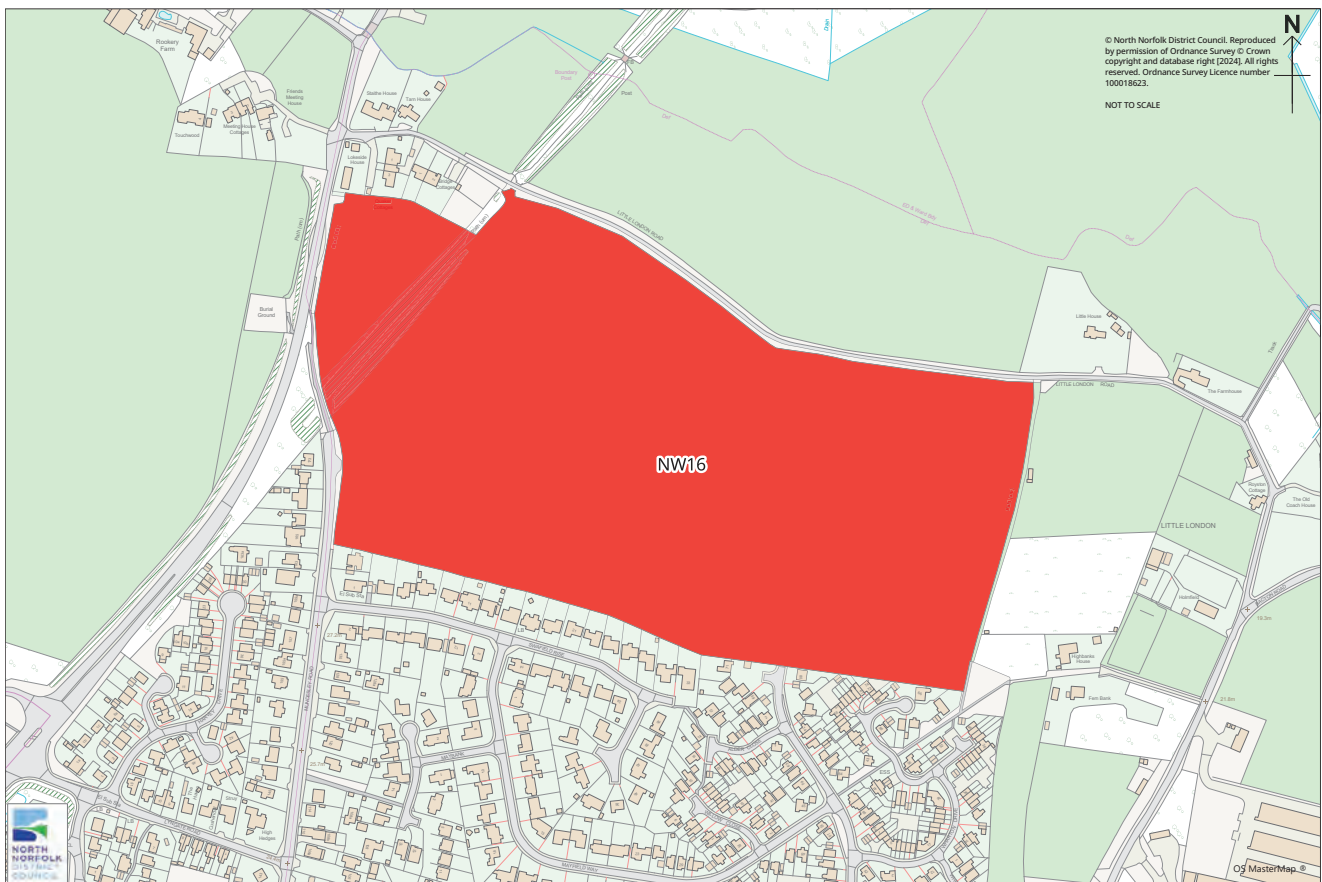
The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

## 2.3 North Walsham: Land at End of Mundesley Road (NW16)

### Proposed Change 3

#### New Site Allocation: Land at End of Mundesley Road, North Walsham

The following site is allocated for a mixed-use development including approximately 330 dwellings, specialist elderly persons accommodation, public open space and associated on and off-site supporting infrastructure:



**Land at End of Mundesley Road (NW16)**

### Description

- 2.3.1** This site is a greenfield site located on the northeast edge of North Walsham. The former railway line, which now forms the Paston Way trail and Knapton Cutting County Wildlife Site, intersects diagonally across the northwestern part of the site and has a lower elevation. The site is bounded by existing residential properties along its southern and part of the western boundaries. The main part of the site is relatively flat, sloping gently downwards to the southeast.
- 2.3.2** The site has reasonable connectivity to town centre services and facilities. North Walsham has good public transport links with both bus and rail being available and there is an existing employment area located to the southwest of the site, which can be easily accessed.

### Constraints

- 2.3.3** Development proposals will have to take into account:

## 2 Places & Sites

- The provision of a primary access onto the B1145 and the potential for a secondary access onto Mundesley Road/Lyngate Road. Provision of and a pedestrian/cycle link to Acorn Road. A new bridge will need to be provided over Paston Way to facilitate access to the B1145.
- The presence of existing heritage assets within the vicinity of the site.
- The presence of a gas pipeline to the north-west of the site following the route of the former railway line, which will require an off-set from residential development.
- The existing mature hedgerows and trees north and east of the site will need to be retained and enhanced to mitigate the site's impact on wider views. Development should be located adjacent to existing built form south of the site, and extensive open space and landscape planting provided to the north.

### Deliverability

- 2.3.4** The site is considered suitable and available for development. It is in single ownership and the owner confirms its availability for development. There are limited constraints on the site and development should be achievable within the plan period.

### Draft Policy NW16

#### Land at End of Mundesley Road

Land amounting to approximately 16 hectares, as defined on the Policies Map, is allocated for development of approximately 330 dwellings, in addition to 40 dwellings equivalent of specialist elderly persons accommodation, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of convenient and safe vehicular access onto the B1145 and additional access provided onto Mundesley Road/Lyngate Road;
2. Provision of a bridge over the Paston Way trail that facilitates access to the B1145 and the rest of the site, careful attention should be given to its design, layout and ability to mitigate and enhance the character of the Paston Way trail and Knapton Cutting County Wildlife Site, ensuring the north-western triangle of land is used for access and landscaping only;
3. Retention and enhancement of the existing mature hedgerows and trees along the northern and eastern boundary of the site;
4. Development should be located to the south of the site with careful attention to site layout and design which incorporates significant open space to the north along with suitable and enhanced landscaping buffer;
5. Provision and enhancement of access to the Paston Way trail and FP11 pedestrian/cycle link with a new pedestrian/cycle link connecting both, and the provision of a new pedestrian/cycle link providing access to Acorn Road;
6. The delivery of multi-functional open space together with measures for its ongoing maintenance;
7. The submission, approval and implementation of a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased;
8. The submission, approval and implementation of a Foul Drainage Strategy providing details of any enhancements and setting out how additional foul flows will be accommodated within the foul sewerage network and delivered prior to occupation of any dwellings;
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

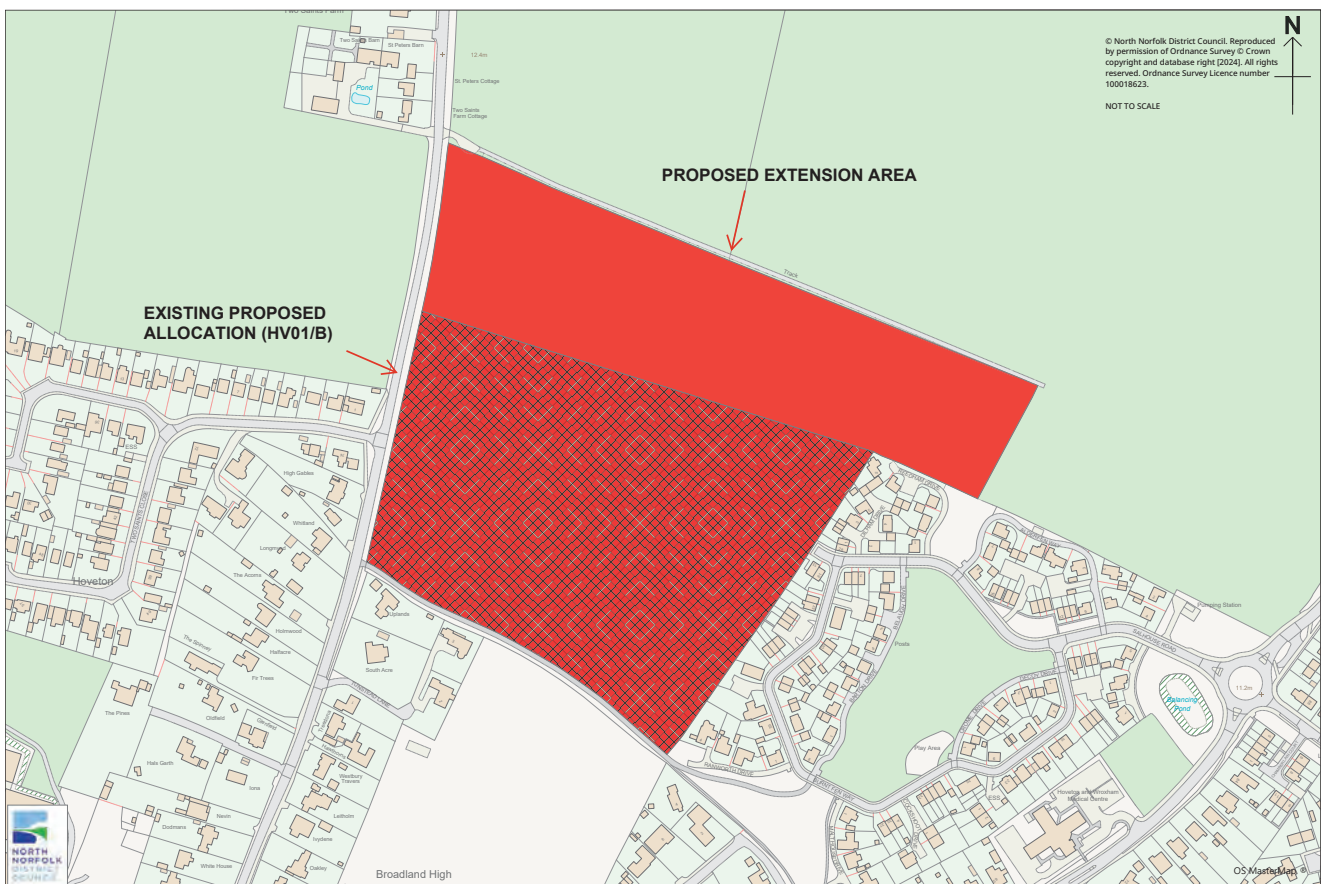


## 2.4 Hoveton: Land East of Tunstead Road (HV01/C)

### Proposed Change 4

#### Extended Site Allocation: Land East of Tunstead Road, Hoveton<sup>(4)</sup>

The following site is allocated for residential development of approximately 150 dwellings and 40 dwellings equivalent of specialist elderly persons accommodation, public open space, and associated on-site and off-site infrastructure:



#### Land East of Tunstead Road (HV01/C)

### Description

- 2.4.1** This site is a combination of the existing allocation, HV01/B and an extended area to the north of the site. The entire site is now referred to as HV01/C. The combined sites can deliver approximately 150 dwellings and 60 elderly persons accommodation units (approx. 40 dwelling equivalent), public open space and associated on-site and off-site infrastructure.
- 2.4.2** The site as a whole is situated on greenfield land, on the northern edge of Hoveton to the east of Tunstead Road. The site is level, predominately in arable agricultural use and lacks any specific topographical or landscape features, apart from the mature hedgerows that border it.

<sup>4</sup> It is recommended to refer to section 13 'Hoveton' of the [Submission Version Local Plan](#) for context.

## 2 Places & Sites

The setting of this site has changed considerably in recent years with the development of the previous HV03 allocation at Stalham Road developed by Persimmon Homes as 'Brook Park'. It is well related to existing residential areas including this recent development.

- 2.4.3** The extended site is located within walking distance of the key services including the rail station and the High School which is around 1.2 km from the primary school. There is a surfaced cycle and pedestrian path which links Tunstead Road and Stalham Road with bus services available on both.
- 2.4.4** The hedgerow along the Tunstead Road frontage with the exception of the required access onto this road should be retained where appropriate and a landscaping buffer should be provided to soften the impact of development to the agricultural land to the north of the site.

### Constraints

- 2.4.5** Development proposals will have to take into account:
- A water catchment strategy is required including a foul water drainage strategy which must complement or align with the overall catchment strategy. An acceptable foul water drainage strategy will involve appropriate / suitable mitigation measures to account for the new development flows discharging foul water while the existing foul water sewerage network is surcharged due to rainfall. Mitigation measures involve running underground pipes to the north of the existing Brook Park and then on to the site which will take foul water from the development directly to Belaugh Water Recycling Centre, where there is capacity.
  - Access to be provided off Tunstead Road with a through connection to Stalham Road and the adjoining allocation.
  - A public footpath and cycle path crosses the site.
  - The site's potential impact on existing heritage assets, including St. Peter's Church, a listed building which lies north of St. Peters Lane.
  - A water main crosses the site.

### Deliverability

- 2.4.6** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

### Draft Policy HV01/C

#### Land East of Tunstead Road

Land amounting to 10.6 hectares, as defined on the Policies Map, is allocated for development of approximately 150 dwellings, in addition to 40 dwellings equivalent of specialist elderly persons accommodation, open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Delivery of a carefully designed residential development that will integrate into the surrounding character;
2. Provision of convenient and safe vehicular access which includes appropriate traffic calming onto Tunstead Road, and the provision of a through-connection for all vehicles to the adjoining allocation and the Brook Park/Stalham Road Roundabout;
3. Provision of pedestrian and cycle connections through the development and adjoining allocation which encourage walking and cycling into Hoveton and neighbouring areas, including green

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access corridors to the open space and to the existing cycle path which runs through the south west of the site;

4. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on heritage assets, including the Hoveton Hall Park and Garden;
5. Delivery of not less than 1.07 hectares of multi-functional open space together with measures for its on- going maintenance;
6. Retention of existing trees and hedgerows where appropriate around the site;
7. Submission of a Transport Assessment undertaken for this development and the adjoining allocation, HV06/A, identifying sustainable traffic mitigation measures that alleviate the potential cumulative impact on the road network.
8. Submission, approval and implementation of a site-specific Water Catchment and Foul Water Drainage Strategy incorporating new pipe work to the north of the allocation and Brook Park that includes direct foul water drainage connection to Belaugh WWTW, in agreement with Anglian Water, and aligned with the Anglian Water catchment strategy, and network improvements;
9. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS);
11. Delivery of comprehensive development in accordance with agreed phasing which ensures delivery of all aspects of the allocated uses.

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

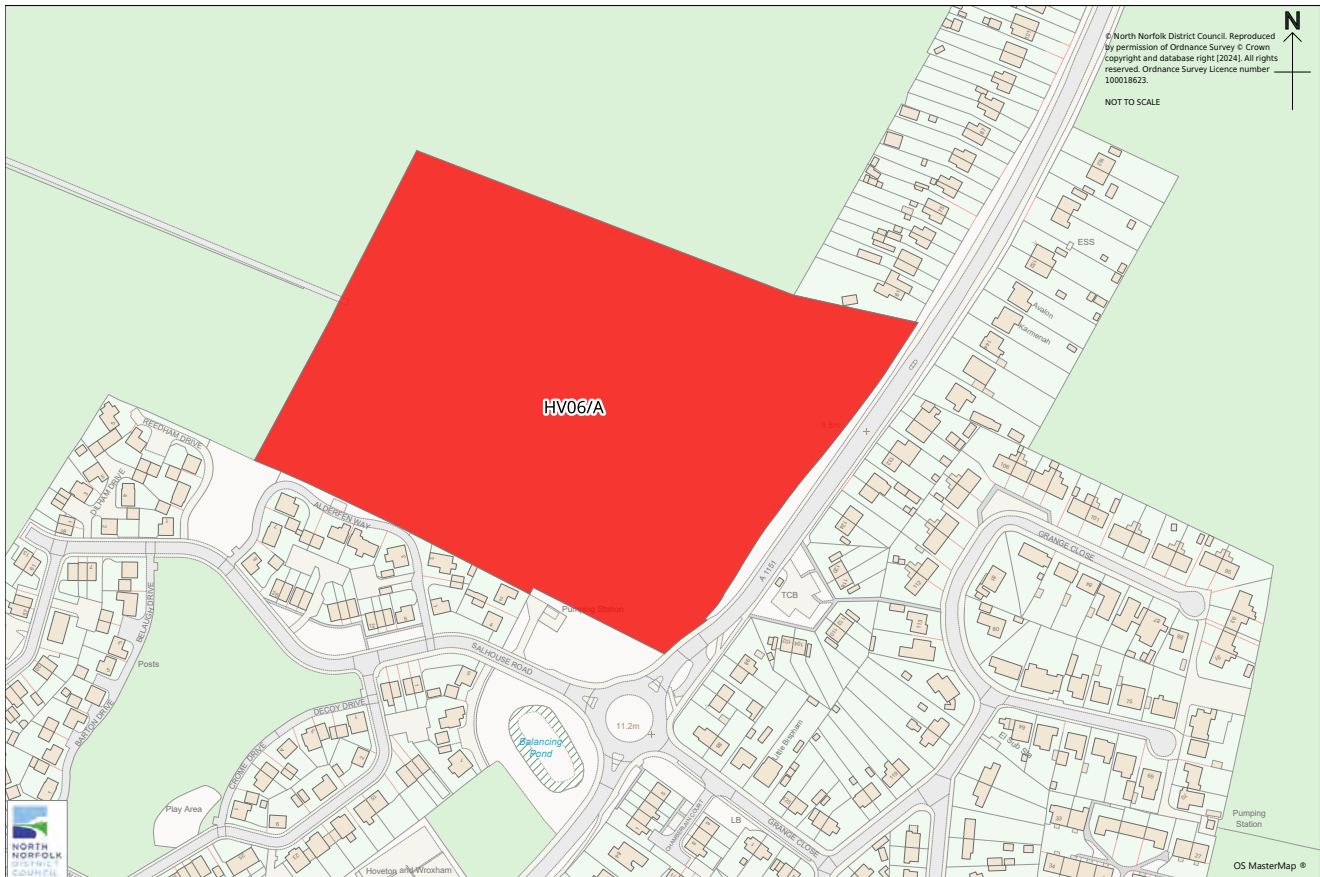
## 2 Places & Sites

### 2.5 Hoveton: Land at Stalham Road (HV06/A)

#### Proposed Change 5

#### New Site Allocation: Land at Stalham Road, Hoveton

The following site is allocated for residential development of approximately 50 dwellings, public open space, and associated on and off-site infrastructure:



Land at Stalham Road (HV06/A)

#### Description

- 2.5.1** This site is part of an agricultural field located to the north of Hoveton and would extend the existing linear ribbon form of development along the A1151 Stalham Road. The site is bounded by residential development to the south and abuts Stalham Road to the east where the site links to a string of existing dwellings at its northeast corner. The site abuts the more recent Brooke Park development to the south.
- 2.5.2** The site has good connectivity to village centre services and other facilities and offers sustainable travel options.

#### Constraints

- 2.5.3** Development proposals will have to take into account:
- The boundary adjacent to Stalham Road contains existing hedgerow.



- There is a moderate area in the centre of the site that may be susceptible to surface water flooding, however, the site is within Flood Zone 1.
- Suitable access can be achieved onto Stalham Road, however, a wider transport assessment will be required in line with the Norfolk County Council's standard guidelines due to sensitive parts of the existing network.
- The well-established hedgerow separating the site's frontage with Stalham Road.
- The site's potential impact on existing heritage assets, including St. Peter's Church, a listed building which lies north of St. Peters Lane.
- A water catchment strategy is required including a foul water drainage strategy which must complement or align with the overall catchment strategy. An acceptable foul water drainage strategy will involve appropriate / suitable mitigation measures to account for the new development flows discharging foul water while the existing foul water sewerage network is surcharged due to rainfall.

### Deliverability

- 2.5.4** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

#### Draft Policy HV06/A

##### Land at Stalham Road

Land amounting to approximately 2.9 hectares, as defined on the Policies Map, is allocated for development of approximately 50 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Delivery of a carefully designed residential development that will integrate into the surrounding character;
2. Provision of a convenient and safe access onto Stalham Road;
3. Appropriate off-site mitigation improvements to the A1151/A1062 double mini roundabout prior to first occupation;
4. Provision of a 3.0m wide pedestrian/cycleway along the full extent of the site frontage onto Stalham Road and provision of pedestrian/cycle connection to adjoining allocation;
5. Provision of a landscaping buffer to the north of the site to soften the boundary between the development and the agricultural land to the north and mitigate potential impacts on the Hoveton Hall Park and Garden;
6. Retention and enhancement of the existing hedgerow fronting Stalham Road where appropriate;
7. Delivery of multi-functional open space together with measures for its on-going maintenance;
8. Submission of a Transport Assessment undertaken for this development and the adjoining allocation, HV01/C, identifying sustainable traffic mitigation measures that alleviate the potential cumulative impact on the road network.
9. Submission, approval and implementation incorporating new pipe work north of the allocation and Brooke Park that includes direct foul water drainage connection to Belaugh WWTW, in agreement with Anglian Water, and aligned with the Anglian Water catchment strategy, and network improvements

## 2 Places & Sites

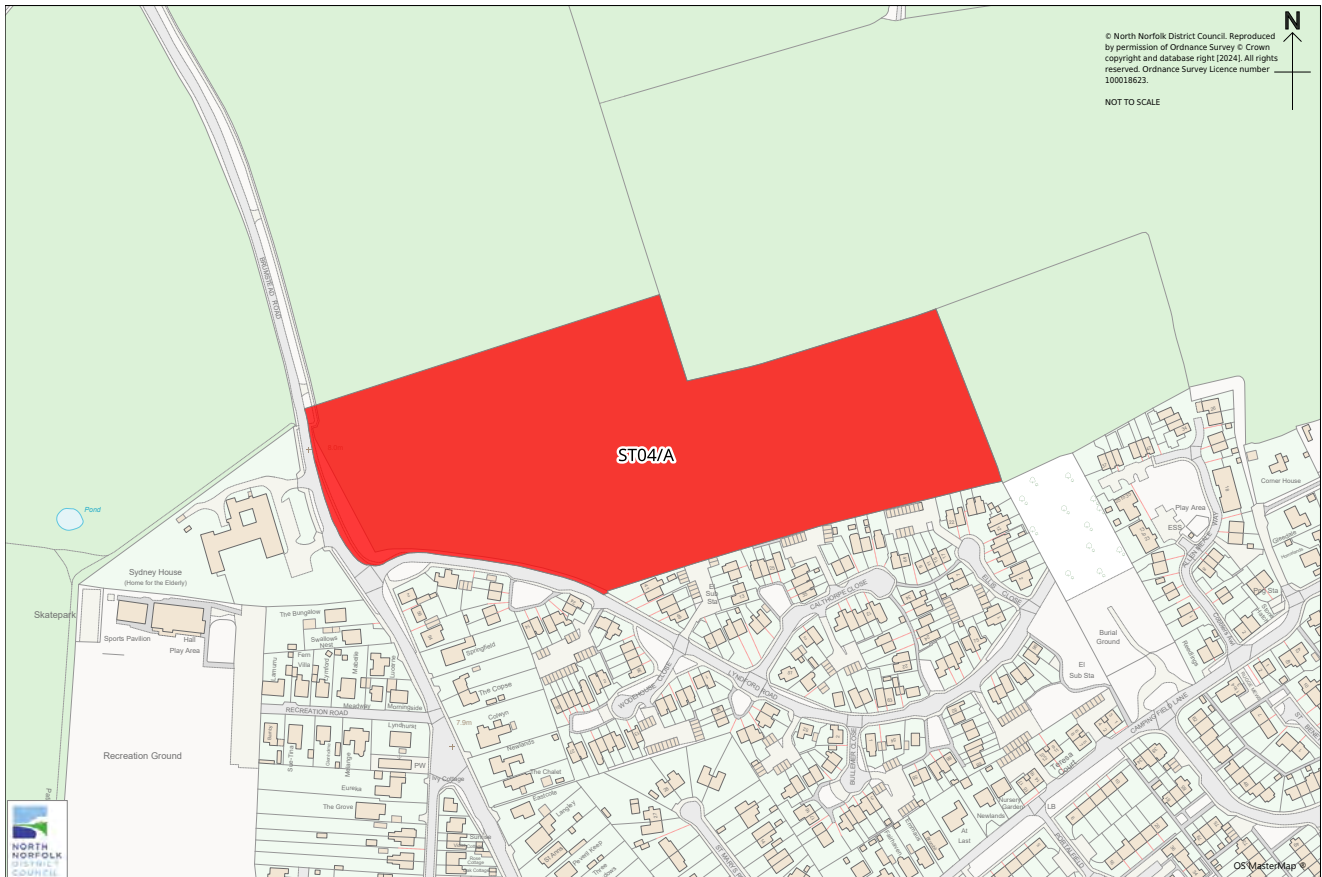
10. Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with Water Framework Directive obligations;
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

## 2.6 Stalham: Land at Brumstead Road (ST04/A)

### Proposed Change 6

#### New Site Allocation: Land at Brumstead Road

The following site is allocated for residential development of approximately 45 dwellings, public open space, and associated on and off-site infrastructure:



Land at Brumstead Road (ST04/A)

### Description

**2.6.1** The site is flat and there are moderately long views of the site available however this is broken up by the presence of existing and well-established field boundaries to the north and north-east. The site abuts the existing built form of Stalham which in this location, the residential area immediately south of the site is considered to be of a high density. A mature hedgerow adjacent to Lyndford Road separates the entryway of Lyndford Road to the south.

### Constraints

**2.6.2** Development proposals will have to take into account:

- The presence of the existing mature hedgerow adjacent to Lyndford Road, which should be retained and enhanced.

## 2 Places & Sites

- The site extends into the open countryside without any existing field boundaries to the north. A new, landscaped boundary should be established that creates a soft edge that appropriately enhances the local character.
- Access should be onto Brumstead Road.

### Deliverability

- 2.6.3** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

### Draft Policy ST04/A

#### Land at Brumstead Road

Land amounting to approximately 5 hectares, as defined on the Policies Map, is allocated for development of approximately 45 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of convenient and safe vehicular access onto Brumstead Road.
2. Provision and enhancement of the existing footpath along the frontage of the site and Brumstead Road to create an improved pedestrian/cycle link that connects with the existing footpath at Lyndford Road;
3. Provision of a new pedestrian/cycle link that connects the site to FP10 and provides a through connection to Brumstead Road;
4. Retention and enhancement of the existing hedgerow adjacent to Lyndford Road and the enhancement of the existing hedgerows and mature trees fronting Brumstead Road where appropriate;
5. Delivery of layout, design and landscaping of the site that respects the setting of the site on the edge of the town and careful attention to building heights and materials;
6. Provision of a landscaped buffer north of the site to establish a new boundary that softens the views from the north of the site;
7. The submission, approval and implementation of a Surface Water Management Plan to demonstrate that greenfield run off rates from the site are not increased;
8. Delivery of multi-functional open space together with measures for its on-going maintenance;
9. The provision of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

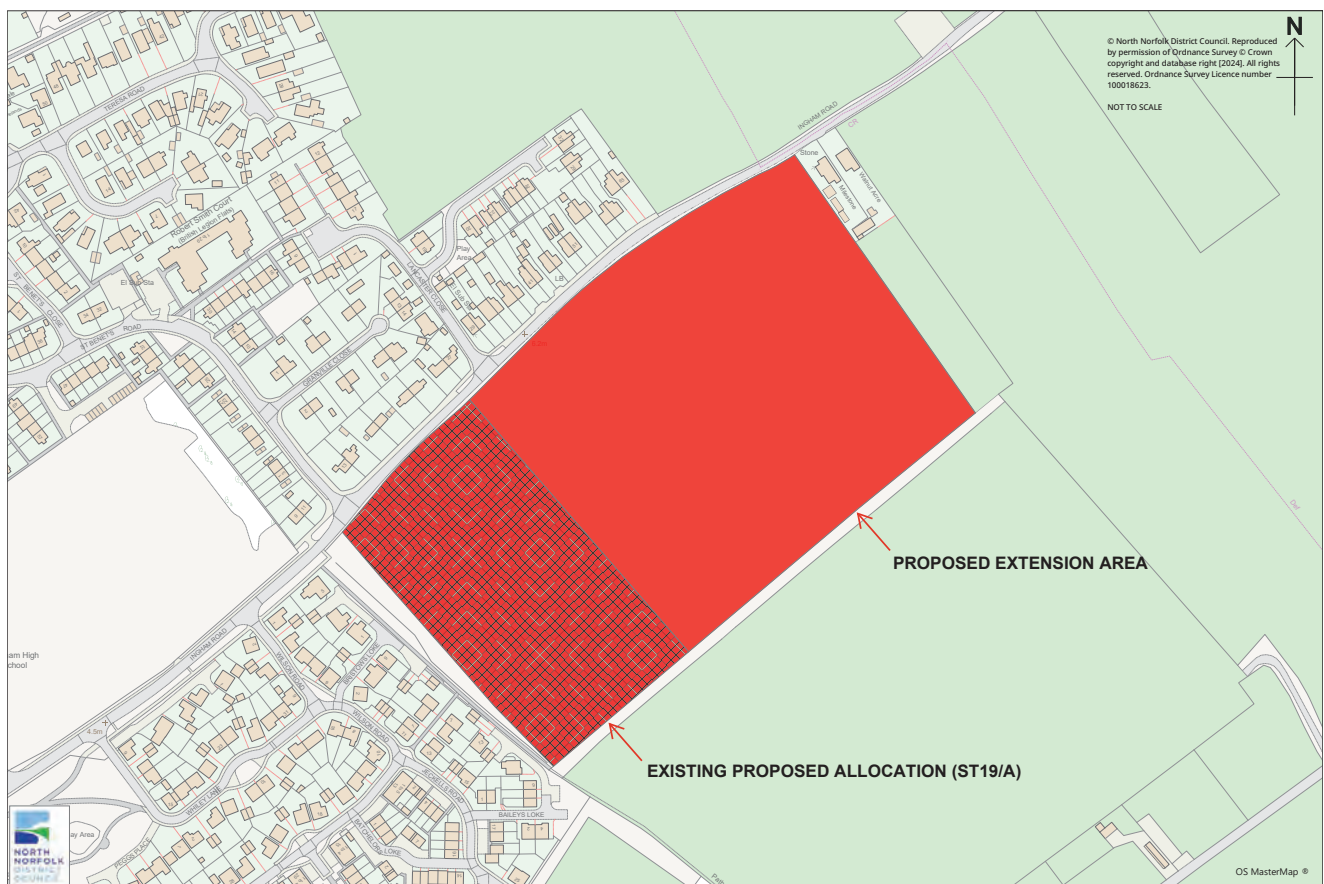
The site is partly underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

## 2.7 Stalham: Land Adjacent Ingham Road (ST19/B)

### Proposed Change 7

#### Extended Site Allocation: Land Adjacent Ingham Road, Stalham<sup>(5)</sup>

The following site is allocated for residential development of approximately 150 dwellings, public open space, and associated on and off-site infrastructure:



#### Land Adjacent Ingham Road (ST19/B)

### Description

- 2.7.1** This site is a combination of the existing allocation ST19/A, and an extended area to the north-east. The entire site is now referred to as ST19/B. The combined sites can deliver approximately 150 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.7.2** The site is greenfield land located on the north-eastern edge of Stalham comprising a large arable field located on Ingham Road. Existing dwellings are located adjacent to the southwestern and majority of the north-western boundaries of the site, along with linking to two properties in the northwest corner.

5 It is recommended to refer to section 16 'Stalham' of the [Submission Version Local Plan](#) for context.



## 2 Places & Sites

- 2.7.3** The site is well related to existing residential areas and to facilities and services within the town being only a short distance from the town centre and local schools. There are footpath links along Ingham Road and bus services available

### Constraints

- 2.7.4** Development proposals will have to take into account:

- The site consists of Grade 1 agricultural land. However, its allocation would have a minimal impact on the overall supply in the town.
- Anglian Water advised that off-sites mains reinforcement is required and enhancements to the foul sewerage network capacity may be required before development can proceed.

### Deliverability

- 2.7.5** The site is considered suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

#### Draft Policy ST19/B

##### Land Adjacent Ingham Road

Land amounting to approximately 7.2 hectares, as defined on the Policies Map, is allocated for residential development of approximately 150 dwellings, public open space, and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access to Ingham Road;
2. Provision of a 2.0m footway along the full width of the southern frontage;
3. Widening of Ingham Road carriageway to 6.0m for the full width of the site frontage;
4. Submission, approval, and implementation of a Transport Assessment to assess whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149;
5. Delivery of layout, design and landscaping of the site that respects the setting of the site on the edge of the town and careful attention to building heights and materials;
6. Provision of a suitable landscaping scheme including, where appropriate, the retention of existing mature trees and the planting of new trees within the site;
7. Provision of appropriate landscape buffering including the retention of existing mature trees along the northern boundary to soften the impact on adjacent dwellings and mitigate the wider views from the north of the site. Retention and enhancement of existing landscaping along the south-eastern boundary of the site;
8. Provision of a Foul Drainage Strategy setting how additional foul flows will be accommodated within the foul sewerage network prior to the commencement of development clear plans should be agreed for any necessary sewerage infrastructure improvements which will need to be confirmed at a project level HRA;(new wording required);
9. Delivery of multi-functional open space together with measures for its on- going maintenance;
10. Site layout and design should take account of a redundant water main within the site; and,
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future

## Places & Sites 2

development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

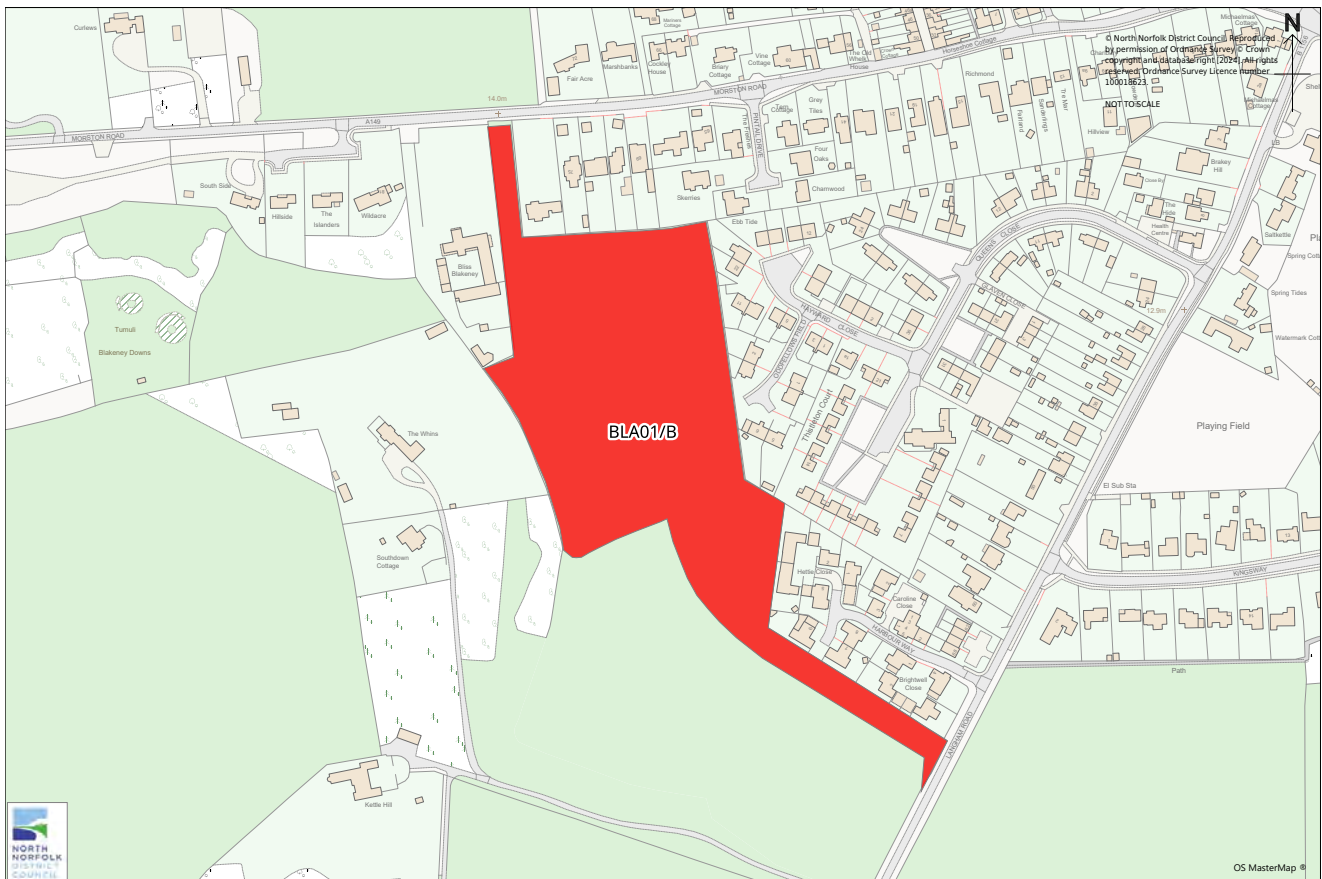
## 2 Places & Sites

### 2.8 Blakeney: Land West of Langham Road (BLA01/B)

#### Proposed Change 8

#### New Site Allocation: Land West of Langham Road, Blakeney

The following site is allocated for residential development for approximately 30 dwellings, public open space, and associated on and off-site infrastructure:



Land West of Langham Road (BLA01/B)

#### Description

- 2.8.1** The site comprises of part of an agricultural field located on the south-west side of Blakeney on the south side of Morston Road, where the majority of land sits adjacent to the existing built form. Existing residential dwellings, including the previous allocation now built out at Harbour Way bound the site to the north, east and partly to the west. Vehicular access is from Langham Road.
- 2.8.2** The site is within the Norfolk Coast National Landscape and acceptable proposals will need to pay particular attention to the landscape impacts of development. Successful schemes will only be supported on the northern part of the site and not on the higher ground to the south and west. Acceptable proposals will need to pay particular attention to the level changes of the site in relation to landscape and neighbouring residential impacts of development. Building heights, roofing materials, proliferation of glazing and the overall design and layout should aim to minimise the impact of development.

## Places & Sites 2

- 2.8.3** Vehicular and pedestrian access should be provided to Langham Road with pedestrian access also onto Morston Road. Off-site improvements to footpaths and crossing points are required to ensure safe walking routes to the villages and services.

### Constraints

- 2.8.4** Development proposals will have to take into account:

- The provision of a vehicular and a pedestrian access onto Langham Road which is suitable and safe, landscaped, and well-designed.
- The provision of a pedestrian/cycle link to Morston Road.
- The site is within the Norfolk Coast National Landscape. In order to mitigate the site's impact, the built development should be located to the north-east of the site, adjacent to the existing built form.
- A Scheduled Monument is located to the west and therefore development will need to provide effective mitigation which includes the enhancement of existing natural boundaries to mitigate the impact on its setting.
- A new footpath will be required from the site access to Morston Road, eastwards to connect to the core of the settlement, alongside improvements to existing crossing points.
- An extension will also be required to Langham Road footway in order to connect to the existing footway at the junction of Harbour Way.
- Anglian Water advise that enhancements to the local foul water drainage network may be required, and any development of the site should comply with the conclusions of a comprehensive foul and surface water strategy.

### Deliverability

- 2.8.5** The site is in single ownership and is being marketed for residential development. It is suitable and available for development and there are limited constraints. Development should be achievable within the plan period.

#### Draft Policy BLA01/B

##### Land West of Langham Road

Land amounting to approximately 3.1 hectares, as defined on the Policies Map, is allocated for development of approximately 30 dwellings, public open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan, and the following site-specific requirements:

1. Provision of convenient and safe vehicular access including alterations onto Langham Road, including carriageway widening at the site frontage to a minimum of 5.0m;
2. Residential development should be limited to the north and east of the site;
3. Delivery of high-quality design which pays careful attention to site layout, building heights, materials and glazing in order to minimise the impact of the development on the National Landscape and wider landscape views of Blakeney Marshes, and to protect the residential amenities of adjacent occupiers;
4. Provision of footway improvements along Langham Road, including the provision of a 2.0m wide footway along the site frontage where appropriate, and extending within the highway to the junction of Harbour Way;
5. Provision of a new pedestrian/cycle link that connects the site to Morston Road including associated off-site improvements, connecting through to Langham Road;

## 2 Places & Sites

6. Provision of high-quality landscaping buffer along the western boundary to Morston Road, and the creation of a soft edge to the southern site boundary and access road to Langham Road, including the retention and enhancement of the existing boundary trees and hedgerows;
7. On-site delivery of multi-functional open space together with measures for its on-going maintenance;
8. Development should conserve, and where appropriate enhance the significance of heritage assets to the west of the site and provide appropriate mitigation for the impact of development on their setting;
9. Submission, approval and implementation of a Surface Water Management Plan ensuring that there are no adverse effects on European Sites and greenfield run off rates are not increased;
10. Submission, approval and implementation of a Foul Water Drainage Strategy demonstrating how additional foul flows will be accommodated within the foul sewerage network;
11. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS).

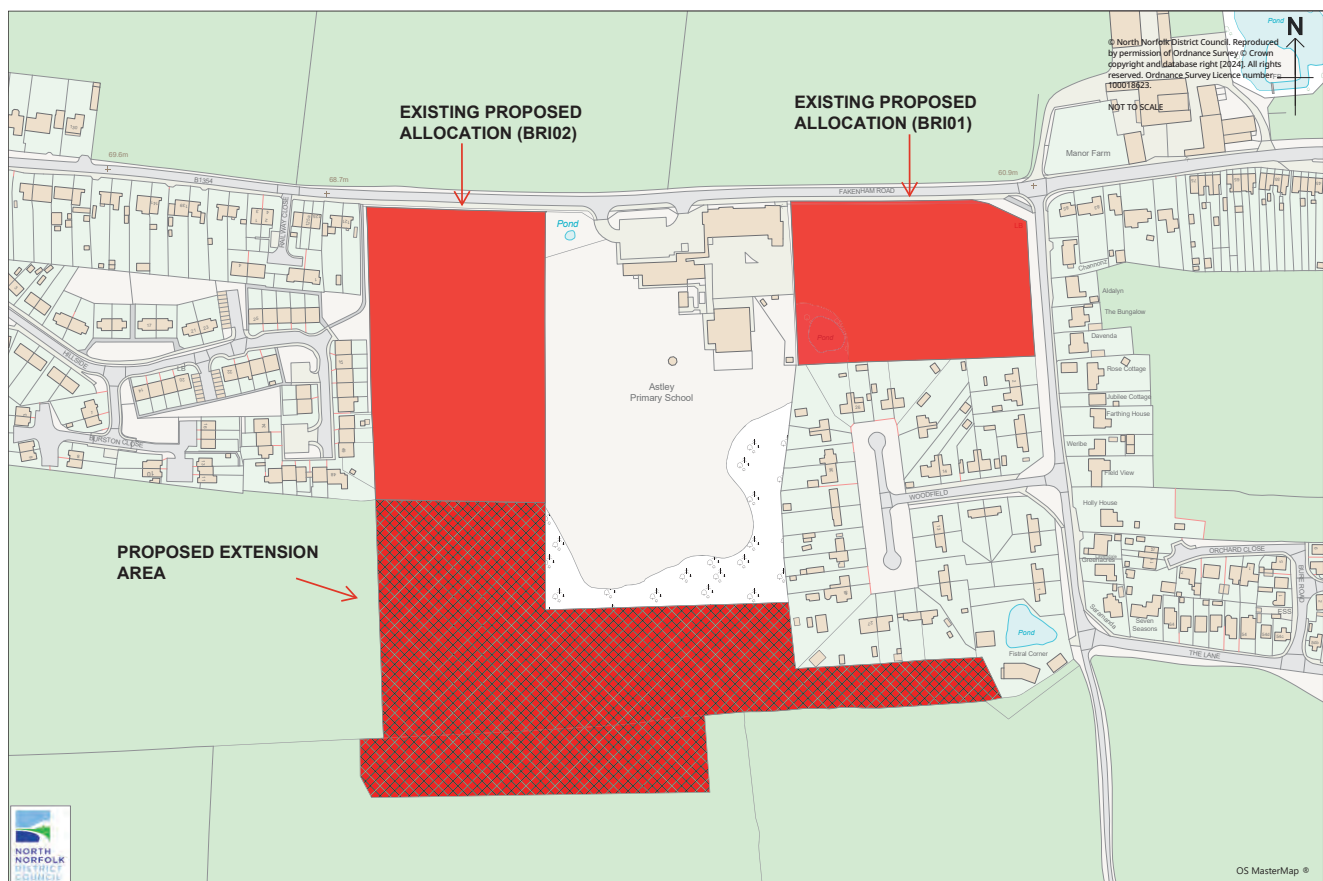


## 2.9 Briston: Land at Astley School (BRI02/C)

### Proposed Change 9

#### Extended Site Allocation: Land at Astley Primary School, Briston<sup>(6)</sup>

The following site is allocated for residential development of approximately 90 dwellings, public open space, school parking, and associated on and off-site infrastructure:



Land at Astley School (BRI02/C)

### Description

- 2.9.1** This site is a combination of the existing allocation, BRI02 and an extended area to the south and south-east. The entire site is now referred to as, BRI02/C. The combined sites can deliver approximately 90 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.9.2** This site is an extension of the existing allocation, BRI02. It comprises of additional agricultural to the south. It is well located in the village with good pedestrian access to key village facilities including the primary school, village shops, doctors' surgery and recreational facilities, and provides for an additional 50 dwellings
- 2.9.3** Vehicular access to the site would be from Fakenham Road which borders the northern boundary of the site.

6 It is recommended to refer to section 19 'Briston' of the [Submission Version Local Plan](#) for context.

## 2 Places & Sites

### Constraints

#### 2.9.4 Development proposals will have to take into account:

- Provision of a car parking (pick up and drop off) facility for the school in association with BRI02. Vehicular access will be through the existing allocation, BRI02.
- Pedestrian / cycleway connections across the site from the adjoining existing housing to the Primary School should be delivered.
- Water main crosses the site and enhancement to the foul sewerage network capacity will be required.
- Potential impacts on heritage assets to the east.

### Deliverability

#### 2.9.5 The site is suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

### Draft Policy BRI02/C

#### Land at Astley Primary School

Land amounting to approximately 9.4 hectares, as defined on the Policies Map, is allocated for residential development for approximately 90 dwellings, public open space, school parking and associated supporting on and off-site infrastructure.

Planning permission will be granted subject to compliance with the policies of this Plan and the following site-specific requirements:

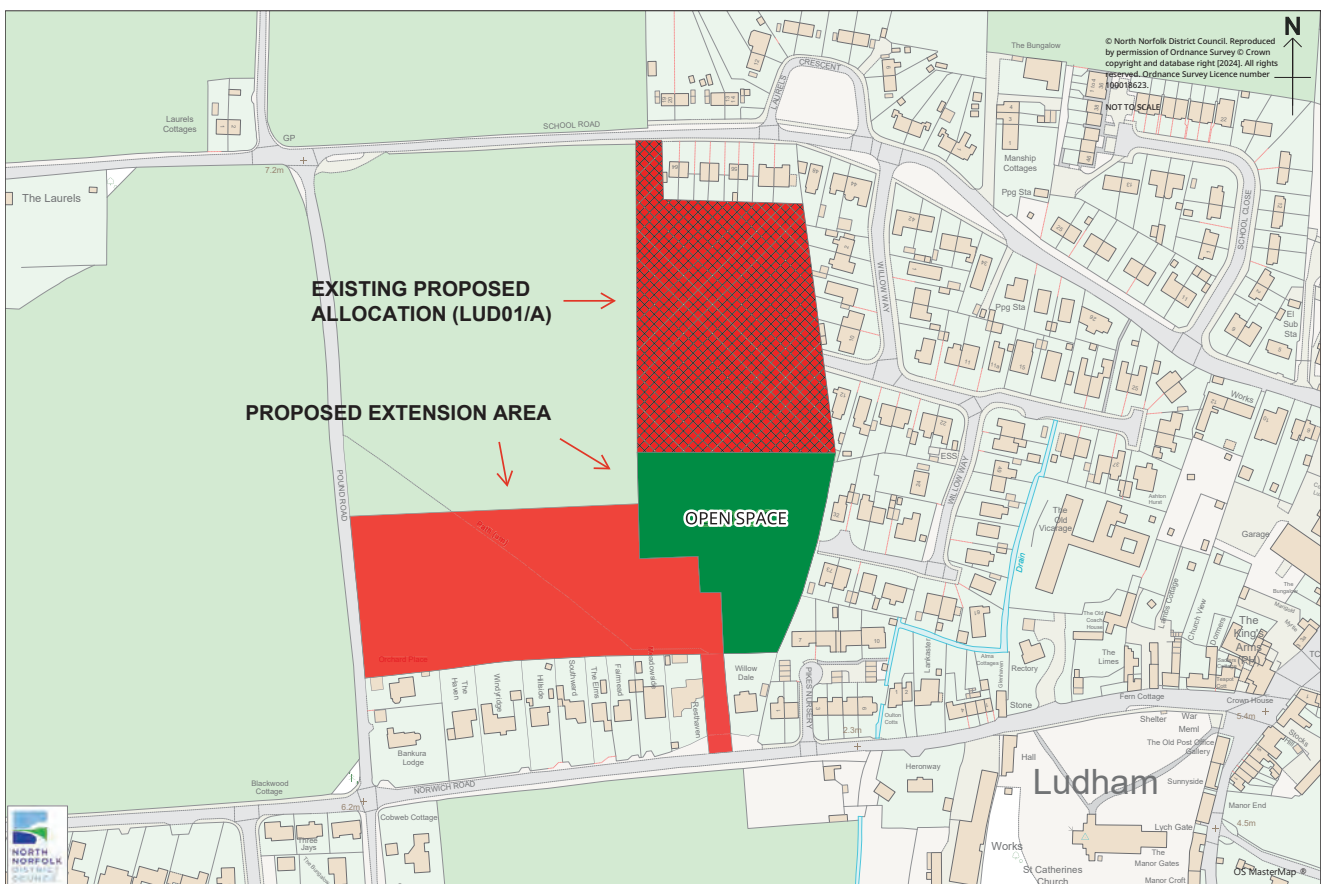
1. Setting back of development from the road frontage along Fakenham Road unless an alternative design approach is identified as more practical and feasible;
2. Provision of a convenient and safe vehicular access from Fakenham Road and/or Hillside;
3. Provision of a car parking area for the school (drop-off and pick-up);
4. Development layout that does not prejudice the potential development/ redevelopment of land to the west including provision of a vehicular access point;
5. Provision of landscaping, green wildlife links throughout the site, and pedestrian/cycle access to the existing network;
6. Submission, approval and implementation of a Foul Drainage Strategy including how additional foul flows will be accommodated within the foul sewerage network;
7. Delivery of multi-functional open space together with measures for its on-going maintenance;
8. Retention and enhancement of existing hedgerows and landscaping along the southern boundary to mitigate the impact of wider views from the south and west.
9. Development should conserve, or where appropriate, enhance the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Manor Farmhouse Grade II listed building
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS)

## 2.10 Ludham: Land South Of School Road (LUD01/C)

### Proposed Change 10

#### Extended Site Allocation: Land South of School Road, Ludham<sup>(7)</sup>

The following site is allocated for residential development of approximately 60 dwellings, public open space, and associated on and off-site infrastructure:



Land South Of School Road (LUD01/C)

### Description

- 2.10.1** This site is a combination of the existing allocation, LUD01/A and an extended area to the south and south-west. The entire site is now referred to as, LUD01/C. The combined sites can deliver approximately 60 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.10.2** The extension to this site comprises of an agricultural field with hedgerow to the western boundary adjacent to Pound Lane. It lies adjacent to established residential development to the north, east and south. Convenient pedestrian links are available to the primary school, recreation ground and general store.
- 2.10.3** A development which accommodates a comprehensive landscaping scheme that reflects the site's prominent edge of settlement location can be suitable in this location.

## 2 Places & Sites

### Constraints

#### 2.10.4 Development proposals will have to take into account:

- The eastern boundary of the site, abutting the existing built development is in Flood Zone 2, which should have a minor impact on the layout of the site. However, development should still ensure that any part of the site demonstrated to be at risk of flooding during the lifetime of the development remains undeveloped. A flood risk assessment / or Flood Warning & Evacuation Plan may be required as part of a planning application to assess all forms of flooding to and from the development and inform the inclusion of suitable control measures. The settlement is located within a larger dry island.
- Anglian Water advises that there is a sustainability reduction at Ludham water treatment works and off-site water mains reinforcement and enhancement to the water recycling centre will be required. Enhancements to the foul sewerage network may also be required before development can proceed. Anglian water's final Drainage and Wastewater Management Plan 2023 confirms the medium-term plan includes multiple solutions at the WRC and in the network. Investment in additional WRC flow capacity is planned between 2020 – 2025. In the medium-term a new permit with increased capacity is proposed at the WRC. Mixed strategies are planned for the network with a main solution of SuDS. The long-term strategy includes infiltration reduction and 25% surface water removal from the network as a solution to address the internal and external sewer flooding risk
- Wider views of St. Catherine's Church.

### Deliverability

#### 2.10.5 The site is suitable and available for development. It is in single ownership. There are limited constraints on the site and development should be achievable within the plan period.

### Draft Policy LUD01/C

#### Land South of School Road

Land amounting to approximately 3.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately 60 dwellings inclusive of open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site-specific requirements:

1. Provision of a convenient and safe vehicular access via Norwich Road and/or Willow Way to accommodate development to the south of the site. No access should be provided from Norwich Road to land north of the designated open space as shown on the Policies Map.
2. Provision of pedestrian footway to connect with the school bus service stop on School Road, and a pedestrian/cycle link that connects development to the north and south of the designated open space as shown on the Policies Map;
3. Delivery of a high quality landscaping scheme particularly along the western and northern boundary;
4. Development should have careful attention to form and site layout by providing approximately 0.7ha of designated open space to the east of the site as shown on the policies map in order to allow for wider views from School Road to the Grade I Listed, St Catherine's Church;
5. Delivery of multi-functional open space together with measures for its on-going maintenance;
6. Submission, approval and implementation a foul drainage strategy setting out how additional foul flows will be accommodated within the foul sewerage network and it is demonstrated that there is adequate capacity in the water recycling centre;

## Places &amp; Sites 2

7. Provision of required off-site water mains reinforcement;
8. Provision of adequate information in order to undertake a project Level Habitat Regulation Assessment, HRA, addressing issues relating to sewerage infrastructure and hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity of the protected sites;
9. Provision of a satisfactory Flood Risk Assessment and completion of any necessary flood mitigation measures; and,
10. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).



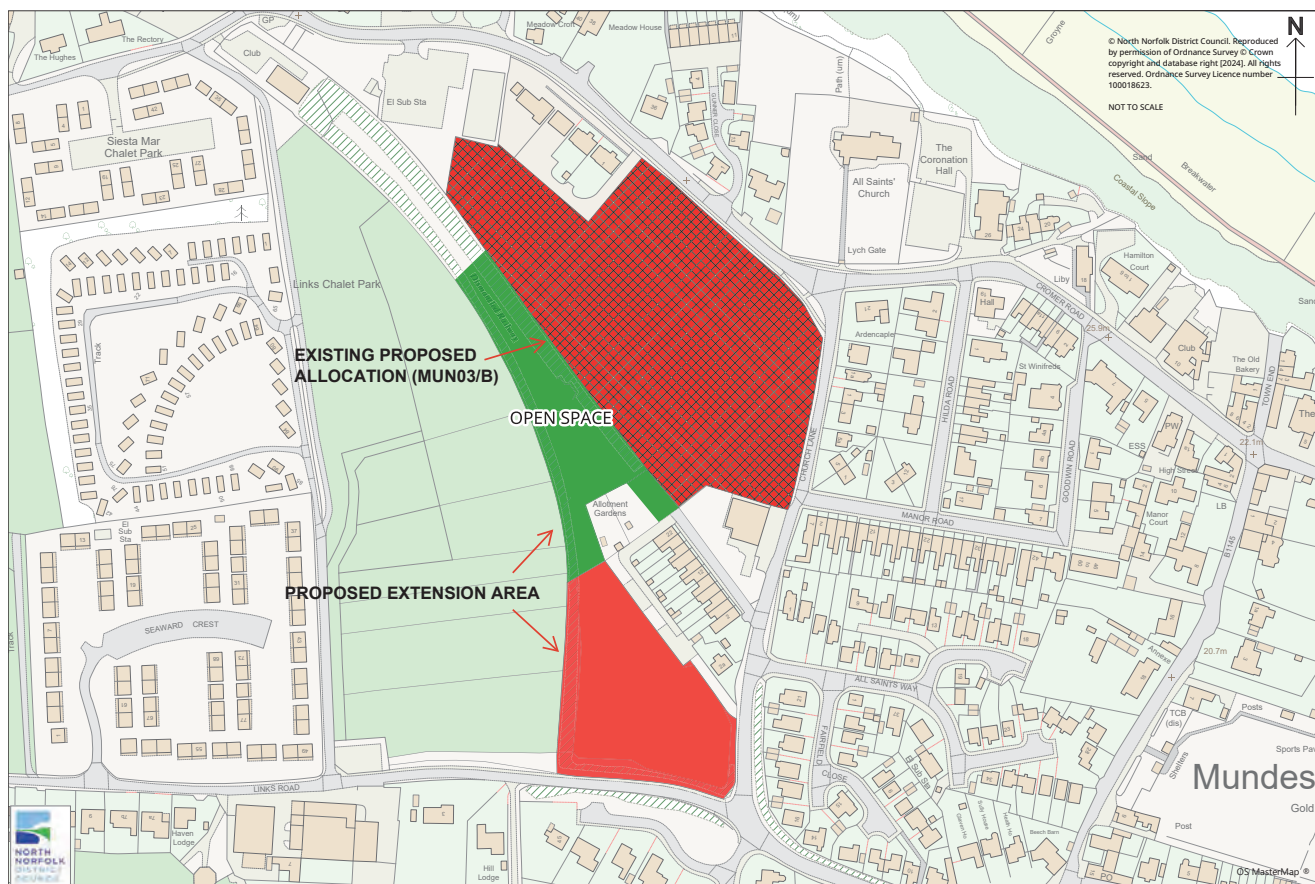
## 2 Places & Sites

### 2.11 Mundesley: Land off Cromer Road & Church Lane (MUN03/A)

#### Proposed Change 11

#### Extended Site Allocation: Land off Cromer Road & Church Lane, Mundesley<sup>(8)</sup>

The following site is allocated for residential development of approximately 45 dwellings, public open space, and associated on and off-site infrastructure:



Land off Cromer Road & Church Lane (MUN03/A)

#### Description

- 2.11.1** The site is a combination of the existing allocation, MUN03/B and an extended area to the south. The entire site is now referred to as, MUN03/A. The combined sites can deliver approximately 45 dwellings, public open space and associated on-site and off-site infrastructure.
- 2.11.2** This site is located just outside the residential area of Mundesley with the former railway embankment abutting the western boundary. The site has three distinct characteristics: 1) the northern section is an elevated pasture field in a prominent part of the village; 2) the former railway embankment with scrub and trees; and 3) the southern part of the site is an open pasture field. The openness of both the northern and southern parts of the site should be carefully considered and developed in a way that does not negatively harm the surrounding landscape.

<sup>8</sup> It is recommended to refer to section 21 'Mundesley' of the [Submission Version Local Plan](#) for context.

- 2.11.3** The site is well located to the existing infrastructure and services in the historic village center (Station Road and the High Street) and additional services along Beach Road.
- 2.11.4** The openness of both the northern and southern parts of the site and the potential impact of development on the landscape will influence design and layout. Furthermore, the site is adjacent to the Conservation Area and the northern part is directly opposite the Grade II listed church. Therefore, any development will require a considered design and landscape led approach to the layout and design of the development.
- 2.11.5** The former railway embankment and associated trees and scrub in the middle of the site would provide open space.

### Constraints

- 2.11.6** Development proposals will have to take into account:
- Anglian Water identify that for new development of over 10 dwellings that some enhancement to the foul sewerage network capacity will be required and off-site mains water supply reinforcement may be required.
  - There is no footway fronting the site's entrance. A footway will need to be provided along Church Lane and connect to All Saints Way.
  - Access to the northern section of the site will need to be provided from Cromer Road. Access for the southern section of the site should be onto Church Lane and avoided from Links Road as it is of a higher elevation.

### Deliverability

- 2.11.7** The site is considered suitable and available for development. It is in single ownership and the owner confirms availability for development. There are limited constraints on the site and development should be achievable within the plan period.

## Draft Policy MUN03/A

### Land off Cromer Road & Church Lane

Land amounting to approximately 3.2 hectares, as defined on the Policies Map, is allocated for residential development of approximately 45 dwellings inclusive of open space and associated on and off-site infrastructure.

Planning permission will be granted subject to compliance with the relevant policies of this Plan and the following site-specific requirements:

1. Development proposals should be stepped back from Church Lane and the Coastal Change Management Area to take account of coastal change and maintain key landscape and heritage views through siting, scale, massing, materials, vernacular style and design to conserve, and where appropriate enhance the Mundesley Conservation Area and grade II listed All Saints Church;
2. Careful attention to layout and building design to ensure no unacceptable overlooking or overshadowing of properties on Church Lane;
3. Retention and enhancement of existing mature trees and hedgerows which form the sites western boundary;
4. Provision of a convenient and safe access from Cromer Road for land north-east of the designated open space as identified on the Policies Map or, if not feasible, from Church Lane to the satisfaction of the Highway Authority. An additional access should also be provided for land south of the area of designated open space, onto Church Lane;

## 2 Places & Sites

5. Provision of approximately 0.5ha of designated open space as shown on the Policies Map that incorporates the railway embankment which provides a pedestrian/cycle link between Cromer Road and Church Lane, and connects to a new footway along the site's frontage on Church Lane to All Saints Way;
6. Delivery of multi-functional open space together with measures for its on-going maintenance;
7. Submission, approval and implementation of effective Surface Water Management plan, ensuring that there is no increase of surface water run-off from the site;
8. Enhancements to the sewage network capacity ahead of occupation of dwellings to prevent detriment to the environment and comply with Water Framework Directive obligations; and,
9. Appropriate contributions towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (GIRAMS).

The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

## 3 Small Growth Villages

- 3.0.1** Policy SS1 sets out the spatial strategy for the district and the approach to where new development will be located. The majority of development will be focussed through proposed allocations in the **Large Growth Towns** of Cromer, Fakenham and North Walsham, then the **Small Growth Towns** of Holt, Hoveton, Sheringham, Stalham and Wells-next-the-Sea.
- 3.0.2** A smaller percentage of growth is directed to the **Large Growth Villages** of Blakeney, Briston, Ludham and Mundesley. A further proportion of growth is directed through indicative housing allowances for **Small Growth Villages**. Growth in Small Growth Villages will only be permitted where development proposals comply with the policy criteria set out in Policy SS1, criterion 3 of the submitted Plan (as modified).
- 3.0.3** Small Growth Village selection is based around a number of sustainability criteria which is set out and justified in Background Paper 2: Distribution of Growth [examination library ref [C2](#)]. The approach adopted is based around the availability of Key Services, Secondary Services and Desirable Services<sup>(9)</sup> in order to help provide for local daily needs.
- 3.0.4** The qualifying criteria for the submitted Local Plan was that a settlement must provide a limited range of services including one Key Service and four of the identified Secondary or Desirable Services. In his initial letter (examination reference EH006(f) - see **Appendix 7**), the inspector suggested that in order to bring forward more housing in the Plan period, Small Growth Villages could be expanded to include those settlements with one Key Service and three Secondary or Desirable Services.
- 3.0.5** An addendum to the Background Paper 2: Distribution of Growth [examination library ref [C2](#)] is included at **Appendix 2**. The addendum supports the Proposed Change below by reviewing, identifying and justifying the 10 additional settlements which qualify for the Small Growth Village category based on the adjusted methodology.

### Proposed Change 12

#### Amend Policy SS1 Spatial Strategy to increase the number of Small Growth Villages (SGVs)<sup>(10)</sup>

- 3.0.6** Policy SS1 Spatial Strategy is proposed to be amended to incorporate the following Small Growth Villages in addition to the list of 23 selected Small Growth Villages as listed in section 4.1 'Spatial Strategy' of the [Submission Version Local Plan](#):

- Beeston Regis
- Erpingham
- Felmingham
- Great Ryburgh
- Itteringham
- Langham
- Northrepps
- Stibbard
- Tunstead
- Worstead

9 **Key Services:** Primary School, Convenience shopping, GP surgery. **Secondary Services:** Post Office, Other Shopping, Public House/Restaurant, Meeting Place (e.g. Village Hall), Connectivity and public transport (Main Road) **Desirable Services:** Petrol Filling Station, Vehicle Repair Shop, Place of Worship, Employment Land.

10 It is recommended to refer to Section 4.1 'Spatial Strategy' of the Submission Version Local Plan for context.

## 3 Small Growth Villages

- 3.0.7** Each village has been assessed for its suitability as a Small Growth Village, and a settlement boundary drawn based on an agreed methodology. The evidence to support this can be found below.

### Supporting Evidence

- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'
- 'Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum'

- 3.0.8** In each identified **Small Growth Village**, rather than allocating specific new development sites, new growth is planned for through an indicative housing allowance which is proportionate to the existing settlement and its size.

- 3.0.9** The adopted approach allows for sites to come forward on a 'windfall basis', where development proposals are adjacent to the defined settlement boundary, and where they adhere to the other elements of criterion 3 (as modified) in Policy SS1.

### Proposed Change 13

**Amend Policy SS1 Spatial Strategy to increase the level of proposed housing growth from 6% to 9% in all Small Growth Villages**

- 3.0.10** Policy SS1 Spatial Strategy is proposed to be amended to increase the indicative level of housing growth in all Small Growth Villages from 6% to 9%.
- 3.0.11** The indicative level of growth that this approach could deliver across Small Growth Villages over the adjusted Plan period 2024-2040 is set out below in an updated 'Table 2 Small Growth Villages Housing Apportionment', with the adjusted Indicative Housing Allowance shown in red text, and the additional Small Growth Villages detailed in Proposed Change 12, above, denoted by bold text.
- 3.0.12** In total, the revised strategy allows for approximately 873 new dwellings across all Small Growth Villages during the period 2024-40.

Settlement (Parish)	Indicative Housing Allowance at 6%	Proposed Indicative Housing Allowance at 9%
Aldborough	15	22
Bacton	31	45
Badersfield (Scottow)	37	35
<b>Beeston Regis</b>	-	<b>43</b>
Binham	8	11
Catfield	27	39
Corpusty & Saxthorpe <sup>(1)</sup>	19	29
East & West Runton	43 <sup>(2)</sup>	64 <sup>(2)</sup>



## Small Growth Villages 3

Settlement (Parish)	Indicative Housing Allowance at 6%	Proposed Indicative Housing Allowance at 9%
<b>Erpingham</b>	-	<b>29</b>
<b>Felmingham</b>	-	<b>23</b>
<b>Great Ryburgh<sup>(1)</sup></b>	-	<b>26</b>
Happisburgh	24	36
High Kelling	17	20
Horning <sup>(3)</sup>	29	0
<b>Itteringham</b>	-	<b>5</b>
<b>Langham</b>	-	<b>15</b>
Little Snoring	16	24
Little Walsingham (Walsingham)	21	31
<b>Northrepps</b>	-	<b>43</b>
Overstrand	25	38
Potter Heigham <sup>(3)</sup>	0	0
Roughton	24	37
Sculthorpe	20	28
Sea Palling <sup>(3)</sup>	0	0
Southrepps	21	34
<b>Stibbard</b>	-	<b>13</b>
Sutton	30	46
Trunch	24	37
<b>Tunstead</b>	-	<b>42</b>
Walcott <sup>(3)</sup>	0	0
Weybourne	21	20
<b>Worstead</b>	-	<b>38</b>
<b>Total Housing Delivery</b>	<b>452</b>	<b>873</b>

Table 2 Small Growth Villages Housing Apportionment

1. Indicative allowance allocated through adopted Neighbourhood Plan
2. Housing figures in Small Growth Villages are based on the existing housing stock as detailed in available census data. Census data is only available for East & West Runton settlements combined.
3. 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 relied upon. Settlement referred to as a 'Constrained Small Growth Village'

## Supporting Evidence

- 'Appendix 2: Distribution of Growth (Small Growth Villages) Addendum'

## 3 Small Growth Villages

## 4 Gypsy, Traveller & Travelling Showpeople's Accommodation

### Proposed Change 14

**Update Section 7.5 of the Plan to align with the latest evidence in 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'<sup>(11)</sup>**

**The purpose of this policy** is to meet, **as a minimum**, the needs for both permanently occupied and transit pitches for the gypsy and traveller communities.

- 4.0.1** The accommodation needs of Gypsies and Travellers should be considered alongside the housing needs of the whole community. Gypsies are protected by the 2010 Equalities Act, and the Council has a duty to seek to eliminate unlawful discrimination and to promote equality of opportunity and good race relations in everything it does.
- 4.0.2** Government policy, **through the NPPF, supported by the updated 2023 'Planning Policy for Traveller Sites' (PPTS)**, requires Local Authorities **to identify and** meet any identified accommodation needs for Gypsies and Travellers, including households who have ceased to travel temporarily or permanently. It is recognised that the **future need in north Norfolk mainly arises from the existing few families already resident in the district and that the** location of sites needs to meet the **dispersed** working and living patterns of Gypsies and Travellers **across the rural district** and that this may include locations in the Countryside. However it is also important to ensure that locations allow for access to essential services, **such as education and health**, are not damaging to the character of the area, and foster good community relations and be consistent with the wider sustainable development principles of the Local Plan.
- 4.0.3** In December 2023 the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that the 2015 PPTS was discriminatory by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. In response, the government amended the definition by re-inserting the word 'permanent'. As now set out in the subsequently updated PPTS, December 2023 for the purposes of planning policy, gypsies and travellers means:
- 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' **educational or health needs or old age have ceased to travel temporarily or permanently**, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.'*
- 4.0.4** The PPTS does require the need to assess the accommodation needs of Gypsy and Traveller households who have ceased to travel temporarily or permanently, but only for the reasons due to education or health needs or old age.
- 4.0.5** The updated 'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)' provides the accommodation needs based on the updated PPTS 2023 definition and a further figure based on ethnic identity and broader ethnic definition. This approach acknowledges the distinctions between planning definitions under PPTS 2023 and broader cultural identities which includes any economic needs, ensuring that all relevant accommodation needs are considered,

11 It is recommended to refer to section 7.5 'Gypsy, Travellers & Travelling Showpeople's Accommodation' of the [Submission Version Local Plan](#) for context.

## 4 Gypsy, Traveller & Travelling Showpeople's Accommodation

thereby aligning with legal obligations under the Equality Act to avoid discrimination and promote equality. The study recommends that the Council adopt the 'ethnic' definition of accommodation needs figures, i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers.

- 4.0.6** The assessment identifies that there is an overall accommodation need across North Norfolk between 2024 and 2040 of 11 pitches (ethnic need) and 9 Pitches (PPTA,2023). There is no additional accommodation need for Travelling Showpeople. This need can be broken down as follows:

Period	Ethnic Definition	PPTS 2023 Definition
2024-29	7	5
2029-34	2	2
2034-40	2	2
Total	11	9

Source: North Norfolk Gypsy, Traveller & Travelling Showpeople Accommodation Needs Assessment, September 2024

- 4.0.7** The existing two transit sites which provide for seasonal visits in the east and west of the district provide an additional 20 pitches collectively and are identified as sufficient to address the transient need. The study does however also recommend that outside the Local Plan provision and transient site use a wider corporate approach could be developed to provide additional overnight stoppage through negotiated stopping arrangements.
- 4.0.8** The evidence for North Norfolk, concluded that the future need for permanently occupied pitches mainly arises from the few Gypsy families already resident and dispersed across the district. This is mainly due to the requirement from new households' formation expected to arise from within existing family units. A smaller element of the need for pitches is also derived from households currently residing in bricks and mortar accommodation. As with the existing provision sites are in private individual ownership and dispersed across the district.
- 4.0.9** The policy provides for the accommodation needs of Gypsies and Travellers by setting Criteria, aligned with the PPTS by which windfall planning applications can be approved. This flexible approach to meet the needs of the gypsy and travellers will ensure that at least a further 11 pitches can come forward between 2024 and 2040 but also allow more subject to demand. As detailed in the PPTS, the approach is one that facilitates, wider sustainability principles along with the traditional and nomadic life of travellers while respecting also the interests of the settled community and promotes the peaceful and integrated co – existence between the site and the local community. At the same time the approach ensures both the need to travel and undue pressure on local infrastructure is avoided and services such as health and education can be accessed.
- 4.0.10** In 2017 as part of the Duty to Cooperate the Norfolk Authorities collectively prepared a **Gypsy, Traveller, and Caravan Needs Assessment**<sup>(12)</sup>. For North Norfolk this concluded that future need for permanently occupied pitches is likely to be very small and mainly arises from the few Gypsy families already resident in the District. Transit pitches for seasonal visits to the District are available at Fakenham and Cromer and have proved to be sufficient to address these needs in the Plan period.
- 4.0.11** In line with national policy, the criteria based policy approach set out in this policy provides the basis for decisions should such applications come forward. The approach is one that facilitates

# Gypsy, Traveller & Travelling Showpeople's Accommodation 4

the traditional and nomadic life of travellers while respecting also the interests of the settled community and promotes the peaceful and integrated co-existence between the site and the local community whilst at the same time ensuring both the need to travel and undue pressure on local infrastructure is avoided and services can be accessed.

- 4.0.12** The Planning Policy for Travellers Sites (PPTS, 2015) defines the travelling community as comprising Gypsies, Travellers and Travelling Showpersons. Gypsies and Travellers are defined in the PPTS as '*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependents' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such*'. Travelling Showpersons are defined in the PPTS as '*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above*'.
- 4.0.13** In determining whether persons are 'Gypsies and Travellers' for the purposes of this policy, consideration should be given to the following issues amongst other relevant matters:
- whether they previously led a nomadic habit of life;
  - the reasons for ceasing their nomadic habit of life;
  - whether there is an intention to living a nomadic habit of life in the future, and if so, how soon and in what circumstances.
- 4.0.14** In respect of those Gypsies and Travellers who do not lead a nomadic lifestyle, the Council will continue to assess and plan to meet their needs as part of its wider responsibilities to plan to meet the accommodation needs of its settled community

## Policy HOU 7

### Gypsy, Traveller & Travelling Showpeople's Accommodation

- Development that meets the identified needs of Gypsies and Travellers and of Travelling Showpeople will be permitted. The accommodation needs of the districts Gypsy & Traveller community will be met by the provision of a minimum of 11 permanent pitches. Development will be permitted for new site provision or for the expansion and intensification of existing sites provided that it is of an appropriate scale and nature and that it complies with all of the following criteria:
  - the intended occupants meet the definition of Gypsies and Travellers, or the description of travelling showpeople;<sup>(13)(14)(15)</sup>
  - development minimises impact on the surrounding landscape;
  - safe vehicular access to the public highway can be provided and the development can be served by necessary utilities infrastructure;
  - the movement of vehicles to and from the site will not result in any unacceptable impact on the capacity of the highway network;
  - there is adequate space for parking, turning and servicing on site;

13 As defined for the purposes of planning policy in the updated 'Planning Policy for Traveller Sites' (PPTS) 2023, or subsequent updates.

14 As defined for the purposes of planning policy in the Planning Policy for Traveller Sites, DCLG, 2015 and Planning Practice Guidance Paragraph: 001 Reference ID: 67-001-20190722, revision date 22.7.2019

15 As defined for the purposes of planning policy in the Planning Policy for Traveller Sites, DCLG, 2015 and Planning Practice Guidance Paragraph: 001 Reference ID: 67-001-20190722, revision date 22.7.2019



## 4 Gypsy, Traveller & Travelling Showpeople's Accommodation

- f. the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities;
  - g. suitable landscaping, boundary enclosures and screening are provided to give privacy, minimise impact on the character and amenities of the surrounding area and neighbouring settled community;
  - h. proposals should include any additional uses intended to be carried out from the site.
- 2. Conditions will be used to control the nature and level of non-residential uses on the site.
- 3. **Proposals which result in the loss of existing authorised Gypsy and Traveller sites/yards or pitches/plots will not be supported unless:**
  - a. **it can be demonstrated that there is no longer a need for such accommodation on the relevant site; or,**
  - b. **replacement pitches or plots are provided within the District.**

### Supporting Evidence

'Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)'

## Appendix 1: Additional Sites Review Background Paper

North Norfolk District Council

# **Additional Sites Review Background Paper**

Contains details of North Norfolk District Council's review of additional sites, prepared in response to the Planning Inspector's Interim Findings on the Norfolk North Local Plan Examination.

**November 2024**

**North Norfolk District Council  
Planning Policy Team**

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**All documents can be made available in  
Braille, audio, large print or in other languages**

# **Additional Sites Review Background Paper**

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- 2) Identification of Potential Additional Sites & Extensions
- 3) Site Assessment Conclusions

## **Appendices**

Appendix 1 - Site Assessment

Appendix 2 - Heritage Impact Assessments

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# Additional Sites Review Background Paper

## 1) Introduction

- 1.1. This Background Paper has been prepared to support the continued Local Plan examination.
- 1.2. Following public examination hearings held in early 2024, the appointed Inspector wrote to the Council setting out that more concrete steps needed to be taken to bring forward additional housing allocations to help address an undersupply across the revised plan period of 2024- 2040.
- 1.3. The potential sites identified in the Paper have already been assessed through the Plan's site assessment process, as set out in the Site Assessment Booklets available in the Council's Examination Library<sup>1</sup> on the authority's website. [\[D1- D12\]](#). This Paper does not introduce any new sites that have not been assessed previously.
- 1.4. The potential additional sites and options for extending existing allocations in the Local Plan have been collated into two separate groups as described below. It is important to note that the Council is still committed to bringing forward development based on the Local Plan's Settlement Hierarchy and the Plan's overall Housing Strategy. Each category below includes a table which identifies whether a site is:
  - Suitable – The site is considered appropriate for development.
  - Available – The site can be developed.
  - Deliverable – The site can come forward within the first 5 years of the Council's Housing Trajectory.
  - Current Status – The most up to date information regarding the site is provided.

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## 2) Identification of Potential Additional Sites & Extensions

### Group A - Additional sites

- 2.1. Group A sites are those that have been selected through a review of individual site assessments contained within each Site Assessment Booklet. The additional sites set out in Group A contains those sites that were previously assessed through the Local Plan's Site Assessment Process and were considered to be suitable for development but were not identified for allocation. This was either due to there being more sites than were needed at the time for that specific settlement or, a different site in the same location provided better opportunities for community benefit. Additionally, Group A sites include opportunities to expand existing allocations where there is an appropriate option to do so. All sites within Category A are being actively promoted by

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<sup>1</sup> <<https://www.north-norfolk.gov.uk/info/planning-policy/local-plan-examination/local-plan-examination-library/4-evidence-base-and-supporting-documents/#section-4-2>>

either the landowner, an agent or promoter. As a result of this, these sites are considered to be the most suitable additional sites as they have highest likelihood of delivery and availability is already confirmed.

2.2. Those promoting the sites have already established a desire for them to be identified as an allocation in the Local Plan or are in some cases actively seeking to pursue proposals for the site through the Development Management process. Category A sites are those that the Council know are Suitable, Available and Deliverable and have no significant barriers to overcome.

2.3. The review of these sites is based upon a number of sources, these being:

- Site Assessment Booklets
- Hearing Statements received from third parties as part of the Local Plan's Examination (EiP) held between January and March 2024, which requested their alternative sites to be considered for allocation.
- Discussions with relevant landowners, agents or promoters during EiP either before or after this period.
- Identification of potential extensions to existing proposed site allocations in the Local Plan where their suitability and availability have already been established.

2.4. The Group A potential sites identified are as follows:

- C10/1, Land at Runton Road/Clifton Park, Cromer
- C22/4, Land West of Pine Tree Farm, Cromer (Extension to existing allocation)
- NW16, Land at End of Mundesley Road, North Walsham
- ST19/B, Land adjacent to Ingham Road, Stalham (Extension to existing allocation)
- LUD01/C, Land South of School Road, Ludham (Extension to existing allocation)
- MUN03/A, Land off Cromer Road & Church Lane, Mundesley (Extension to existing allocation)
- BLA01/B Land West of Langham Road, Blakeney
- F05, Land between Holt and Greenway Lane, Fakenham
- HV01/C, Land East of Tunstead Road, Hoveton (Extension to existing allocation)
- HV06/A, Land at Stalham Road, Hoveton
- BRI02/C, Land at Astley Primary School, Briston

2.5. The following table provides a simplified summary for each alternative site.

**Table 1. Group A Sites Summary**

Site Name	Area (ha)	Capacity	Suitable	Available	Deliverable Within 5 Years	Current Status
<b>C10/1</b> Land at Runton Road/Clifton Park, Cromer	8.02	70	✓	✓	✓	Site was actively promoted throughout EiP.
<b>C22/4</b> Land West of Pine Tree Farm, Cromer	18.4*	100**	✓	✓	✓	Part of site is already allocated in the Local Plan
<b>NW16</b> Land at End of Mundesley Road, North Walsham	16	330	✓	✓	✓	Site was actively promoted throughout EiP.
<b>ST19/B</b> Land adjacent to Ingham Road, Stalham	5*	80**	✓	✓	✓	ST19/A (part of site) already a proposed allocation, remainder of site ST19/B or whole site being promoted post EiP.
<b>LUD01/C</b> Land South of School Road, Ludham	2.15*	40**	✓	✓	✓	Site was actively promoted throughout EiP and pre application advice sought.
<b>MUN03/A</b> Land off Cromer Road & Church Lane, Mundesley	0.72*	15**	✓	✓	✓	Part of site is already allocated in the Local Plan, extent of additional land determined post EiP.
<b>BLA01/B</b> Land West of Langham Road, Blakeney	3.17	30	✓	✓	✓	Site was actively promoted throughout EiP.
<b>F05</b> Land between Holt Road & Greenway Lane, Fakenham	0.71	21	✓	x	x	At the time of assessment, the site was available and is a current allocation in the adopted Site Allocations DPD but has not come forward. Deliverability is not yet known. The site is located inside the Settlement Boundary.
<b>HV01/C</b> Land East of Tunstead Road, Hoveton	4.2*	30**	✓	✓	✓	Site is an extension to an existing allocation in the Plan and was proposed at Reg.19 and put forward for allocation at the EiP.
<b>HV06/A</b> Land at Stalham Road, Hoveton	2.94	50	✓	✓	✓	Site was a previous option, not promoted at EiP but discussed with promoters post EiP.
<b>BRI02/C</b> Land at Astley Primary School, Briston	5.6*	50**	✓	✓	✓	The extended site was promoted post EiP and in conjunction with the proposed allocation(s) progressing through

						Development Management processes.
<b>Total</b>		791				

\*These figures indicate the extent of the extended area and not the total site area of the extension and the existing allocation.

\*\* These capacity figures indicate the quantum of dwellings that can be provided within the extended site area and does not show the total capacity of the entire site.

2.6. The following table provides a simplified summary for each alternative site. Where an extension to an existing allocation is being considered, the change to the site's total area and capacity will change as a result to the following:

**Table 2. Total Site Areas**

Site Name	Total Area (ha)	Total Capacity
C22/4	44	500
ST19/A & B	7.25	150
LUD01/A & C	3.4	52*
MUN03/A & B	3.2	45
HV01/C	10.6	150
BRI02/C	9.4	90

\*This figure is based on the capacity of the planning permission received for the proposed allocation, LUD01/A for 12 dwellings. The allocation within the plan for LUD01/A is for 20 dwellings which would result in a total across both sites of 60 dwellings.

## Group B - Additional Sites

2.7. Group B sites are those that have been selected through a review of individual site assessments contained within each Site Assessment Booklet. This review looked at the potential for sites that were not considered suitable for development but were discounted from the process on grounds that could still allow some development to occur albeit on a smaller scale. Examples of this would be:

- Sites that were discounted from the process for being too large in scale.
- Sites that were discounted from the process for constraint reasons that could potentially be mitigated through smaller, more sensitive scale development.
- Sites that were discounted from the process for being too far from the town centre but are still within reasonable walking distance to other key services and facilities such as a train station.

2.8. The potential-sites listed within this group would require further assessment to identify the potential scale at which the sites could be considered suitable for development and allocation in the Local Plan and consult the necessary specialists. The Council would need to engage with the relevant landowners, agents or promoters of the sites to understand their willingness to progress the allocation of a site. Additionally, as referred to above, consideration would need to be given to any additional growth impacts in locations with existing proposed allocations.

2.9. The sites identified in Group B are:

- C19/2, Land at Compitt Hills (Larner's Plantation), Cromer
- ST04, Land at Brumstead Road, Stalham
- HV05, Land at Horning Road, Hoveton

2.10. The table below provides a simplified summary for each alternative site.

**Table 3. Group B Sites Summary**

Site Name	Area (ha)	Capacity	Suitable	Available	Deliverable Within 5 Years	Current Status
<b>C19/2</b> Land at Compitt Hills, Cromer	4.96	100	x	✓	x	The site was discounted from the site assessment process, but a smaller portion of the site could be considered suitable for development pending appropriate mitigation to constraints.
<b>ST04/A</b> Land at Brumstead Road, Stalham	5	45	✓	x	x	At the time of assessment, the site was not suitable but a review identifies a portion could be suitable. The site was available at the time of assessment, deliverability is not yet known.
<b>HV05</b> Land at Horning Road, Hoveton	13.38	150	x	✓	x	Site was promoted at Reg.19, the site was available at the time. Deliverability is not yet known.
<b>Total</b>		295				

### Site Area & Capacity

2.11. The site areas and capacity provided within the tables above were either determined by the Council using a desktop assessment or provided by the relevant promoters.

## 3) Site Assessment Conclusions

3.1. The following sites are considered suitable for allocation as an additional site. The detailed assessments are included in the appendix to this document. The conclusions of these assessments are provided below:

### Group A Sites

#### **C10/1, Land at Runton Road / Clifton Park, Cromer**

3.2. There are no significant constraints on-site however, the site can be considered to lie within the setting on the National Landscape, therefore, development will need to be

sensitive in its design and avoid extension of its built form too far westwards towards this designation. Access from Runton Road is suitable however alternative access from Clifton Park to the east could also be suitable. The presence of the WRC to south has no impact on the development suitability but some consideration in the site's design should be given towards its location, preferably providing a buffer of open space and landscaping between the WRC and the built form. There are no designated heritage assets on-site and there is no impact on the setting of assets in the wider area. The Sustainability Appraisal provided a positive scoring, and the site is well located to existing services and facilities in Cromer. In addition, the site is referred to by the Inspector,[Examination reference EH006 (f), who states in paragraph 29 *"a further site outside the National Landscape, Land at Runton Road/Clifton Park was proposed as an allocation for 90 dwellings in the 2019 draft plan but was not carried forward into the submitted plan. The merits of this site should clearly be reconsidered..."* as an additional allocation. The site is suitable, available and deliverable. It lies within single ownership.

### **C22/4, Land West of Pine Tree Farm, Cromer (Extension)**

- 3.3. The site is an existing allocation in the Local Plan (C22/2) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension to this allocation will progress the site further southwards and further into the National Landscape, which the entire site lies within, this will require landscape mitigation to off-set the visual impact on the landscape and soften the impact on wider views. Although clearly a significant development in the context of the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. The extension is located south of Beckett's Plantation which is already identified in the Site-Specific Policy for C22/2 as a feature that needs to be retained and enhanced, alongside existing RoW connections. The extension will need to avoid any negative impact and support this policy requirement. There are no heritage assets within the extension and existing assets are a significant distance away from this part of the site where there will be no impact on their significance/setting. Mitigation against the impact on the Grade II Pine Tree Farmhouse is already established in the site-specific policy for C22/2. The extension will help to deliver an existing requirement to provide a roundabout on the A149 by providing additional land for its construction. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts. The site is suitable, available and deliverable. It lies within single ownership.

### **NW16, Land at End of Mundesley Road, North Walsham**

- 3.4. The site includes a County Wildlife Site that lies to the west and intersects through the site, encompassing the Paston Way Trail. Design will need to carefully consider its impact on this designation and where possible, enhance the existing features of the CWS. The Paston Way Trail is also positioned at a lower elevation to the rest of site which becomes more severe towards the Mundesley Road access point, the layout of the site will need to avoid providing residential development in this location, instead offering open space



and landscaped buffering. Access will be primarily from the B1145 and enter the site to the north-west, and will need to cross the Paston Way Trail, as aforementioned, the design will need to carefully consider the impact of any crossing over this designation. An additional secondary access could potentially be provided from Mundesley which lies immediately adjacent to the site's south-western boundary however, the principal access should be from the B1145. In addition to this, there is an opportunity to provide a pedestrian/cycle link that could connect the site to Acorn Road, which would improve the site's connectivity with the existing development to the south. The site's elevation undulates throughout site's area and landscape mitigation should be provided along the northern and eastern boundary to mitigate the impact of views from the north and the setting of any nearby heritage assets. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts. The site is suitable, available and deliverable. It lies within single ownership.

#### **ST19, Land adjacent to Ingham Road, Stalham (Extension)**

- 3.5. The site is an existing allocation in the Local Plan (ST19/A) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site north-eastwards and is well situated within the existing built form, complementing the existing development on the other side of Ingham Road. Landscape mitigation will be required along the north-eastern boundary to off-set the impact on wider views and provide a buffer between the development and existing dwellings. The Sustainability Appraisal assessed the site as Positive. The site is suitable, available and deliverable. It lies within single ownership.

#### **LUD01/C, Land South of School Road, Ludham (Extension)**

- 3.6. The site is an existing allocation in the Local Plan (LUD01/A) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site south of the allocation, LUD01/A and to its south-west. There are no significant constraints on-site however, the extension does remain within the setting of the Grade I listed, St. Catherine's Church. To mitigate the site's impact, an area of open space should be provided to retain the existing open views of the church from across the site area to School Road and beyond. In addition, a landscaped buffer should be provided along the extension's northern frontage that helps soften views from the north. Access will be provided by Norwich Road or Willow Way however, a pedestrian access to the existing allocation, utilising the aforementioned area of open space should also be provided to help improve connectivity between the two areas of development and the existing built form. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts. The site is suitable, available and deliverable. It lies within single ownership.

#### **HV01/C, Land East of Tunstead Road, Hoveton (Extension)**

- 3.7. The site is an existing allocation in the Local Plan (HV01/B) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension was discussed at the aforementioned

hearing sessions and proposed as a modification to the Local Plan at that time. The extension includes no significant constraints and will extend the site northwards which may potentially have some impact on the setting of the heritage asset to the north, the Grade II\* Listed Church of St Peter which lies north of St. Peter's Lane, landscape mitigation may be required to off-set any impact on this designation. Access for the site is from Tunstead Road, the extension will not require an additional access however it does provide an opportunity to provide a through connection to Stalham Road and the adjoining allocation, HV06/A. Due to the increase in development in Hoveton from this site and HV06/A, A joint Transport Assessment for both sites will be required to assess the impact on the wider road network and provide any necessary mitigation. HV01/C and HV06/A will also need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water. The Sustainability Appraisal assessed the site as Positive. The site is suitable, available and deliverable. It lies within single ownership.

#### **HV06/A, Land at Stalham Road, Hoveton**

- 3.8. There are no significant constraints on-site. Access can be achieved from Stalham Road and there is potential for vehicular and pedestrian access to connect to the adjoining allocation, HV01/C. Due to the increase in development in Hoveton from this site and HV06/A, A joint Transport Assessment for both sites will be required to assess the impact on the wider road network and provide any necessary mitigation. HV01/C and HV06/A will also need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water. The site extends westwards, away from Stalham and sits slightly further north than the adjoining allocation, HV01/C. As a result, it may have some impact on the heritage asset, St Peter's Church, to the north and landscape mitigation should be sought to off-set any possible impact. The site is not considered to be a countryside gap as it does not result in coalescence and represents a suitable in-fill opportunity. There is an existing hedgerow along the site's frontage to Stalham that may need to be partially lost to provide access, the remainder should be retained and enhanced where appropriate. The Sustainability Appraisal assessed the site as Positive. The site is suitable, available and deliverable. It lies within single ownership.

#### **BLA01/B, Land West of Langham Road, Blakeney**

- 3.9. There are no significant constraints on-site however, the site does lie entirely within the Norfolk Coast National Landscape. Mitigation will be required, and development should be located to the north-east of site, immediately adjacent to the existing built form in order to limit the site's impact on this designation and landscape mitigation along the western boundaries will off-set the site's impact on wider views from the west. This will also help mitigate any impact on the setting of two heritage assets that lie to the west of the site. The original conclusion set out in the Site Assessment Booklet is based on a larger site (BLA01/A) that could have provided a higher capacity. It is considered that a smaller portion (as now being promoted through BLA01/B) is suitable and can alleviate the concerns mentioned above through appropriate mitigation schemes. Access to the

site can be achieved from Langham Road where a new footway will be required to connect the access to the existing built form. No vehicular access should be provided from Morston Road. The Sustainability Appraisal assessed the site as Neutral, with a mixed score for environmental impacts. The site is suitable, available and deliverable. It lies within single ownership.

#### **BRI02/C, Land at Astley Primary School, Briston (Extension)**

3.10. The site is an existing allocation in the Local Plan (BRI02) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site southwards and wrap around the existing school. Development will need to be situated to the north of the extension to provide a comprehensive design with the existing proposed allocation, BRI02, and provide open space/landscape mitigation that will help off-set impacts on wider views from the south. Access via Fakenham Road is already established via BRI02, no additional access is required. The Sustainability Appraisal assessed the site as Positive. The site is suitable, available and deliverable. It lies within single ownership.

#### **MUN03/A, Land off Cromer Road & Church Lane, Mundesley (Extension)**

3.11. There are no significant constraints on-site. The site is an existing allocation in the Local Plan (MUN03/B) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site westwards to incorporate an unused railway embankment and land to the south-west, adjacent to Church Lane. The extension's western boundary forms an existing tree belt that should be retained and enhanced to mitigate wider views from the west. Access to the extension will be from Church Lane along the site's southern frontage where pedestrian access will also need to be established. Access should not be provided onto Links Road due to the differing elevations. The railway embankment provides an opportunity to provide an area of open space that can link to the areas of development together to provide a more comprehensive scheme. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts. The site is suitable, available and deliverable. It lies within single ownership.

3.12. Of the Group A sites, the following sites are not considered appropriate at this time:

- F05, Land between Holt and Greenway Lane, Fakenham

3.13. F05 is not considered suitable for allocation as an additional site. This is due to this site being located within the existing settlement boundary of Fakenham and as such policies already allow the site to come forward.

#### **Group B Sites**

3.14. There are no significant constraints on-site. Access can be achieved from Brumstead Road although the existing footway along the road and site's frontage will need to be improved and connect to Lyndford Road. The presence of a tall, mature hedgerow at the entrance to Lyndford Road prevents any connection onto Lyndford from within the site

however, the hedgerow will not impact access from Brumstead Road, and a pedestrian access can be achieved along the site's frontage therefore, this hedgerow should be retained and enhanced. Additionally, opportunities should be sought to improve the PROW to the east and this can be used as an opportunity to provide connectivity between the site and residential development to the south. The site may have some impact on the long-range views from the north and landscape mitigation should be provided to offset this. The site has good access to existing services, facilities and the town centre which lies to the south. The Sustainability Appraisal assessed the site as Positive.

3.15. Of the Category B sites, the following sites are not considered appropriate at this time:

- C19/2, Land at Compitt Hills (Larner's Plantation), Cromer
- HV05, Land at Horning Road, Hoveton

3.16. C19/2 was initially discounted from the site assessment process due to concerns regarding access onto Roughton Road and the site's impact on the wider landscape. After consultation with the Highways Authority, an acceptable solution to providing a safe access on Roughton Road cannot be realistically achieved and therefore, the site cannot be considered as a proposed allocation.

3.17. HV05 was initially discounted from the site assessment process due to its size and intrusion into the open countryside as it would extend beyond the existing built form of the settlement. Though the Council have reviewed a possible smaller portion of the site, it is considered that this issue cannot be resolved without significant landscaping mitigation measures. Depending on the scale of development, there is also the potential for offsite traffic impacts and there are existing constraints on Horning Road that may prevent more than one safe point of access into the site. The site also lies towards the lower end of Hoveton where there are known issues with water ingress into the wastewater network, no solution or further information has been provided and as such cannot realistically be considered as a proposed allocation at this time. However, the Sustainability Appraisal assessed the site as Positive and an alternative scheme that adequately addresses the issues on this site could come forward through other means such as Development Management or Neighbourhood Planning.

## Appendix 1: Additional Sites Assessment

<b>Cromer</b>	
<b>C10/1 Land at Runton Road/Clifton Park</b>	
<b>Conclusion from Site Assessment Booklet:</b>	Considered suitable for development, on the basis of a lower density scheme at Reg 18 stage. However, at Reg 19 the site was discounted from further consideration on the basis of there being greater public benefits from other sites.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Potential negative biodiversity impact; adjacent National Landscape [previously known as AONB], close proximity CWSs (Cromer Sea Front, Hall Wood &amp; Cromer Old Cemetery), SSSI &amp; local geodiversity site (East Runton Cliffs), scrub, dry grassland. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, leisure and cultural opportunities, access to local healthcare service, education facilities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	No designated heritage assets are identified on the site however a number of assets are within the wider vicinity. The heritage impact assessment [Examination Reference C10], concludes that development of the site would have no impact on the significance of these heritage assets including any contribution made to their significance by their settings and limited impact overall on the wider Historic environment.
<b>Highways:</b>	Appropriate access can be achieved from Runton Road to the north or, there is an existing spur from the adjacent Clifton Park development that is suitable for access.
<b>Anglian Water:</b>	A WRC lies to the south of the site. Previously, Anglian Water raised some concerns over odour emissions potentially having an effect on development. Significant headroom exists in Cromer to accommodate future growth. The draft DWMP states the long-term strategy i.e. beyond the Local plan period of increasing WRC capacity by ensuring a 10% reduction in surface water entering the network.
<b>Nutrient Neutrality:</b>	Not within a nutrient zone.

<b>Landscape:</b>	The site lies to the west of Cromer and is bounded by residential development at Clifton Park to the east and a railway line to the south. The site is not within the Norfolk Coast National Landscape but could have some impact on its setting as the National Landscape designation area lies to the west of the site. The site consists of open scrub/grassland with woodland to the west and there are recreational pathways that intersect the site, especially to the south where the elevation of the site undulates. The extent of the site is visible from Runton Road to the north. The site includes several pedestrian connections that intersect in different directions, it is essential that development retain and enhance these connections in particular, ensuring that connections are provided to areas beyond the site's extent and including a northern-southern pedestrian route along the eastern boundary of the site that also provides access to Clifton Park.
<b>Other:</b>	The site is of recreational interest and pedestrian access throughout the site should be retained and enhanced.
<b>Conclusion:</b>	<p>There are no significant constraints on-site however, the site can be considered to lie within the setting on the National Landscape, therefore, development will need to be sensitive in its design and avoid extension of its built form too far westwards towards this designation. Access from Runton Road is suitable however alternative access from Clifton Park to the east could also be suitable. The presence of the WRC to south has no impact on the development suitability but some consideration in the site's design should be given towards its location, preferably providing a buffer of open space and landscaping between the WRC and the built form. There are no designated heritage assets on-site and there is no impact on the setting of assets in the wider area. The Sustainability Appraisal provided a positive scoring, and the site is well located to existing services and facilities in Cromer. In addition, the site is referred to by the Inspector, who states in paragraph 29 of his initial letter [Exam ref EH006(f)] <i>"a further site outside the National Landscape, Land at Runton Road/Clifton Park was proposed as an allocation for 90 dwellings in the 2019 draft plan but was not carried forward into the submitted plan. The merits of this site should clearly be reconsidered..."</i> as an additional allocation.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>C22/4 Land West of Pine Tree Farm</b>	
<b>Conclusion from Site Assessment Booklet:</b>	The smaller site C22/2 is considered suitable for development, the site is already identified as an allocation in the submitted Plan.
<b>Sustainability Appraisal:</b>	<p>Overall, the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> - Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential to affect setting of Grade II Listed Building (Pine Tree Farmhouse). Potential for remediation of contamination. Potential negative biodiversity impact; within National Landscape, arable, mature trees / hedgerow to boundaries, adjacent woodland. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p>



	<p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, access to leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to educational facilities, transport links, access to employment, services / facilities. High speed broadband in vicinity. Town centre accessible from the site.</p>
<b>HRA:</b>	The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	There are no designated heritage assets on the extension to the existing allocation. However, the existing allocation does lie adjacent to three of the boundaries of the Grade II listed Pine Tree Farmhouse. The extension therefore has the potential to contribute to impact of the setting of the grade II listed building however, the existing policy (C22/2) already provides appropriate mitigation to alleviate these impacts. The extension will need to expand on these requirements where appropriate. Several designated heritage assets are also identified further afield. However, given the significant distances the HIA concludes in relation to these that development of the site would have no impact on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.
<b>Highways:</b>	Access can be achieved from the A149 and there is an existing requirement to provide two access points on this road. The southerly access point is required by previous highways comments at Regulation 18 & 19 to provide a roundabout.
<b>Anglian Water:</b>	Significant headroom exists in Cromer to accommodate future growth. The draft DWMP states the long-term strategy i.e. beyond the Local plan period of increasing WRC capacity by ensuring a 10% reduction in surface water entering the network.
<b>Nutrient Neutrality:</b>	Not within a nutrient zone.
<b>Landscape:</b>	<p>The site is within the Norfolk Coast National Landscape. Justification for the Local Plan's need to include allocations in the National Landscape is set out in the Council's Matter 5 statement. [Examination reference EH011 (a)(1)]. The Norfolk Coast National landscape has a striking diversity of scenery, embracing a rich mix of coastal features contrasting inland agricultural landscapes, woodlands and villages, all of which are influenced to a greater or lesser degree by the proximity of the sea. The site falls within the wider Tributary Farmland Landscape Character Type. The Tributary Farmland Type is generally characterised by open and rolling/undulating rural farmland with some elevated plateau areas and a rich diversity of minor settlement, woodland and historic estates.</p> <p>The landscape retains a rural character with dark night skies. The extension to the existing allocation consists of one smaller sized arable field adjacent to Roughton Road to the west, and one larger field that warps around the southern extent of Beckett's Plantation and are, in the main, shielded from view by Pine Tree Farm and the residential properties along the Norwich Road on the east; by the railway line to the north and by</p>

	<p>the Beckett's Plantation. This woodland and the wooded hedge lined boundaries along the sites southern boundaries are to remain as local landscape features, so the development of the site could be well contained. There is a public footpath which runs through the site and residential development would change the characteristics of the landscape and impact on the views outwards from this public footpath. The approach along the Norwich Road into Cromer starts to become urbanised on the western side of Norwich Road with the ribbon development of 18 properties. Development of the extension to the existing allocation would extend development further away from the built form of Cromer and become more exposed to wide ranging views. Mitigation would be required along southern boundary primarily, which would include enhancing existing natural buffers and providing opportunities for open space that enhance recreational activity where appropriate. Although clearly a significant development in the context of the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
<b>Other:</b>	There is a public Right of Way that intersects the site which should be retained and enhanced.
<b>Conclusion:</b>	<p>The site is an extension to an existing allocation in the Local Plan (C22/2) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension to this allocation will progress the site further southwards and further into the National Landscape, which the entire site lies within, this will require landscape mitigation to off-set the visual impact on the landscape and soften the impact on wider views. Although clearly a significant development in the context of the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. The extension is located south of Beckett's Plantation which is already identified in the Site-Specific Policy for C22/2 as a feature that needs to be retained and enhanced, alongside existing PRoW connections. The extension will need to avoid any negative impact and support this policy requirement. There are no heritage assets within the extension and existing assets are a significant distance away from this part of the site where there will be no impact on their significance/setting. Mitigation against the impact on the Grade II Pine Tree Farmhouse is already established in the site-specific policy for C22/2. The extension will help to deliver an existing requirement to provide a roundabout on the A149 by providing additional land for its construction. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts.</p>

	The site is suitable, available and deliverable. It lies within single ownership.
<b>North Walsham</b>	
<b>NW16, Land at End of Mundesley Road</b>	
<b>Conclusion from Site Assessment Booklet:</b>	Considered suitable for development but was not selected as an allocation due to significant growth being offered by other sites and not being required to address the then housing numbers.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low / low to moderate susceptibility GWF, small area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (The Thatched Cottage). Potential negative biodiversity impact; includes land of CWS (Paston Way &amp; Knapton Cutting), arable, mature trees / hedgerow to majority of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	The HIA concludes [Examination Reference C10], that development would see limited impact on the historic environment but with some potential impact on two Grade II listed buildings to the north-west. Recommended that policy wording is used to ensure consideration is given to appropriate assets.
<b>Highways:</b>	<p>The site should be provided with access from the B1145, subject to detailed design and the provision of land to the north-west, immediately adjacent to the B1145 and which is within the site's boundary and will be used only for the provision of open space and access/highway development.</p> <p>There is potential for a secondary access from Mundesley Road which lies adjacent to the south-western extent of the site's boundary, but this should not be used as the primary access for the site. Lyngate Road provides an alternative connection between the B1145 and Mundesley Road but is considered to be constrained and in places quite narrow. Due to the residential nature of the area A pedestrian / Cycle access can also be provided onto Acorn Road.</p>

<b>Anglian Water:</b>	There is available headroom for growth in North Walsham, however investment is likely required as a result of additional growth in North Walsham to ensure that water supply and wastewater capacity is available in addition to the delivery of comprehensive green infrastructure incorporating sustainable urban drainage and flood water & storage measures.
<b>Nutrient Neutrality:</b>	NW lies within the catchment of the River Bure and its surface water catchment zone. However, its foul water does not drain into the River Bure catchment, instead it discharges to NW Wastewater Treatment Works and then pumped to Mundesley and then out to sea. In light of this, NW is not affected by NN requirements. It is not necessary therefore to demonstrate mitigation proposals. – More detail is included in the Appendix to the Council's Matter 5 statement. [EH011(a)(1)]
<b>Landscape:</b>	The site is situated on arable land on the northeast edge of North Walsham. A disused railway line intersects diagonally across the northwestern part of the site. The land is bounded by residential properties along its southern boundary and part of the western boundary also however, the northern boundary abuts Little London Road where there is a significant change in elevation on either side of this road and an existing tree belt. The site experiences undulating elevation, particularly where the disused railway line is situated as the embankments are steep and deep (though this elevation becomes less severe to the north). Development should not be located immediately adjacent to the disused railway line which is now a public Trail and a County Wildlife Site. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	<p>Paston Way: The Paston Gateway footpath &amp; CWS runs north-south intersecting the access from the main road to the rest of the site. Currently, proposals are for a bridge to pass over this footpath which is set below the level of the rest of the site on both sides. There is an existing brick bridge that connects Mundesley Road to the main B-road. This cannot be surpassed as it is the only connection from that end of Mundesley Road to the main B-road. There is an opportunity in the policy wording to make this bridge an attractive design to try and mitigate its impact on the footpath.</p> <p>The Offshore Wind Farm Order 2022 (SI 2022 No. 138) (as amended) is relevant to part of this site. The Order limits for the onshore transmission works (duct installation) and access management plans cross the northwestern triangular portion of NW16 land and the northwestern corner of the main parcel of NW16 land. An access has been constructed in association with these Order works on the western side of the B1145 to the north of the Quaker Burial Ground and opposite the layby which is adjacent to the western boundary of the triangular part of NW16.</p>
<b>Conclusion:</b>	The site includes a County Wildlife Site that lies to the west and intersects through the site, encompassing the Paston Way Trail. Design will need to carefully consider its impact on this designation and where possible, enhance the existing features of the CWS. The Paston Way Trail is also positioned at a lower elevation to the rest of site which becomes more severe towards the Mundesley Road access point, the layout of the site will need to avoid providing residential development in this location, instead offering open space and landscaped buffering. Access will be

	<p>primarily from the B1145 and enter the site to the north-west, and will need to cross the Paston Way Trail, as aforementioned, the design will need to carefully consider the impact of any crossing over this designation. An additional secondary access could potentially be provided from Mundesley which lies immediately adjacent to the site's south-western boundary however, the principal access should be from the B1145. In addition to this, there is an opportunity to provide a pedestrian/cycle link that could connect the site to Acorn Road, which would improve the site's connectivity with the existing development to the south. The site's elevation undulates throughout site's area and landscape mitigation should be provided along the northern and eastern boundary to mitigate the impact of views from the north and the setting of any nearby heritage assets. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>Stalham</b>	
<b>ST19/B, Land adjacent to Ingham Road (Extension)</b>	
<b>Conclusion from Site Assessment Booklet:</b>	Considered suitable, available and deliverable for development. Part of the site (ST19/A) is already identified as an allocation. Expansion area is not included within allocation but was assessed as part of the ST19 site and considered suitable for development. – already an allocation.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	The site is within 2500m of the Broadland SPA/Ramsar site, 2500m of The Broads SAC and 5000m of the Greater Wash SPA. The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	There are a number of historic assets within the vicinity of the whole site. The HIA concludes [Examination Reference C10], because of the distances and level of intervening features, including existing residential developments, between the site and the historic assets that development of the site would have no impact on the special qualities or significance of

	these heritage assets including any contribution made to their significance by their settings.
<b>Highways:</b>	Site can be access from Ingham Road as already proposed through the existing allocation, ST19/A. The extension will utilise access through the already proposed allocation and will not require an additional access. However, provision of suitable pedestrian/cycle facilities including provision for full extent of frontage will be required. A Transport Assessment is required to assess whether off-site highway mitigation works are necessary. Specifically, consideration is required of traffic capacity at any junctions between the site and the A149.
<b>Anglian Water:</b>	Enhancements are required to the foul sewage network capacity. The draft DWMP identified the requirement for Anglian Water to increase capacity, and this has informed the Water Recycling Long-term Plan, 2018 where Investment is identified in the through AMP 7 (2025-2030) and Amp 8 (2025-2030). Beyond the Local Plan period a new further capacity is sought through reduction in surface water by 25% and it is envisaged that a new permit will be required reflecting the increased flows from the EA.
<b>Nutrient Neutrality:</b>	<p>The entirety of Stalham lies within the <b>River Bure – Ant Broads</b> Surface Water Catchment &amp; Foul Drainage catchment.</p> <p>The promoters have been working with Norfolk Rivers Consortium to prepare an NN assessment and mitigation strategy.</p> <p>The conclusions of the Nutrient Neutrality Assessment and Mitigation Strategy are that the site would achieve nutrient neutrality through off-site mitigation measures i.e. securing or purchasing credits. Post-LURA upgrade works, the development shall be nitrogen neutral, and without the need for offsite mitigation as demonstrated in the calculations. However, long term phosphorus mitigation will still be required. Norfolk Rivers Consortium have confirmed that it can deliver all the required mitigation at pace and cost in this area.</p>
<b>Landscape:</b>	The site is situated on arable land to the south of Ingham Road in Stalham. Prominent trees line Ingham Road with predominantly two storey dwellings to the north of Ingham Road. Immediately to the southwest of the site is a relatively new residential development of a mix of a single and two storey dwellings. There are agricultural fields to the south of the site. The topography of the site is fairly flat and there are long range views from the public right of way (to the south-west of the site) to the Church of the Holy Trinity (Ingham). The site is not within the Norfolk Coast National Landscape. The extension to this site progresses development further into arable land but remain well situated to the built form of Stalham but the design of the site should consider the setting of the settlement's character in this area.
<b>Other:</b>	N/A
<b>Conclusion:</b>	The site is an existing allocation in the Local Plan (ST19/A) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site north-eastwards and is well situated within the existing built form, complementing the existing development on the other side of Ingham Road. Landscape mitigation will be required along the



	<p>north-eastern boundary to off-set the impact on wider views and provide a buffer between the development and existing dwellings. The Sustainability Appraisal assessed the site as Positive.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>ST04/A, Land at Brumstead Road</b>	
<b>Conclusion from Site Assessment Booklet:</b>	The site was previously discounted from further consideration. Development on the site would extend into the open countryside having a greater impact on the quality of the landscape than the proposed alternatives sites put forward. The site is also poorly located in relation to services and facilities and includes a larger area of high-grade agricultural land. Better alternatives existed at the time to meet the required residential requirements.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, approximately 1/6 of site potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	The site is within 2500m of the Broadland SPA/Ramsar site, 2500m of The Broads SAC and 5000m of the Greater Wash SPA . The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	A Grade II listed church, St Peter's Church lies approx. 1km to the north of the site. The church is not visible from long ranging views, a copse of trees directly south of the church and existing mature hedgerows helps prevent any views of the church from the south. The site will not have an impact on the setting of the church. Several designated heritage assets are identified to the south and southwest of the site. The HIA concludes in relation to these that because of separation distances and intervening development and topography, development of the site would have no impact on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.
<b>Highways:</b>	Access from Brumstead Road is achievable subject to suitable access and pedestrian/cycle provision.
<b>Anglian Water:</b>	Enhancements are required to the foul sewage network capacity. The draft DWMP identified the requirement for Anglian Water to increase capacity, and this has informed the Water Recycling Long-term Plan, 2018 where Investment is identified in the through AMP 7 (2025-2030) and Amp

	8 (2025-2030). Beyond the Local Plan period a new further capacity is sought through reduction in surface water by 25% and it is envisaged that a new permit will be required reflecting the increased flows from the EA.
<b>Nutrient Neutrality:</b>	<p>The entirety of Stalham lies within the <b>River Bure – Ant Broads</b> Surface Water Catchment &amp; Foul Drainage catchment.</p> <p>Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits.</p>
<b>Landscape:</b>	The site is situated to the north of Stalham and lies within a flat landscape that is intersected by well-established hedgerows and mature tree belts that break up long ranging views. The site is bounded by built development to the south and a mature hedgerow on the frontage of Lyndford Road, and trees and hedgerows along the site's frontage with Brumstead Road. The full extent of the site would progress development beyond the existing settlement edge therefore only a portion of the site that mirrors the existing built form of Stalham on the opposite side of Brumstead Road is suitable. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	<p>There is a very tall, mature hedgerow that separates the site from the built form of Stalham. Unsure if it would need removing – keeping it will make the site feel separated from the rest of the town but removing it might be significant ecological impact.</p> <p>A public right of way enters the site and runs along its eastern boundary.</p>
<b>Conclusion:</b>	<p>There are no significant constraints on-site. Access can be achieved from Brumstead Road although the existing footway along the road and site's frontage will need to be improved and connect to Lyndford Road. The presence of a tall, mature hedgerow at the entrance to Lyndford Road prevents any connection onto Lyndford from within the site however, the hedgerow will not impact access from Brumstead Road, and a pedestrian access can be achieved along the site's frontage therefore, this hedgerow should be retained and enhanced. Additionally, opportunities should be sought to improve the PROW to the east and this can be used as an opportunity to provide connectivity between the site and residential development to the south. The site may have some impact on the long-range views from the north and landscape mitigation should be provided to offset this. The site has good access to existing services, facilities and the town centre which lies to the south. The Sustainability Appraisal assessed the site as Positive.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>Ludham</b>	
<b>LUD01/C, Land South of School Road</b>	
<b>Conclusion from Site Assessment Booklet:</b>	LUD01/A - Considered suitable, available and deliverable for development. The site is well contained within the landscape, lies behind existing built form along School Road and Norwich Road and is within walking distance to the primary school and other services & facilities.

	<p>Concluded that it was too large in its entirety and that a smaller sized site would be more preferable in scale (LUD01/A)</p> <p>LUD01/B - The site was not considered further due to there being a number of constraints identified. Development of the site would have a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside, away from the built form of Ludham.</p>
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, mostly within FZ1, FZ2 touches part east boundary, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity The Broads, arable, mature hedgerow / trees to some boundaries. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores neutral; edge of settlement, good access to local healthcare service and primary education facilities, limited leisure and cultural opportunities and limited peak time public transport links.</p> <p><b>Economic</b> – Scores mixed; edge of settlement, good access to services / facilities, some access to employment, educational facilities. High speed broadband in vicinity, limited transport links. Could support local services.</p>
<b>HRA:</b>	<p>The site is within 2500m of the Broadland SPA/Ramsar site, 2500m of The Broads SAC and 5000m of the Greater Wash SPA . The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns. The Appropriate assessment identified relatively low risks which can be addressed at a project level HRA.</p>
<b>Heritage Impact Assessment:</b>	<p>Information provided in booklet – key issue is views of the Church across the site which does not affect the built form of LUD01/C as long as the provision of open space south of the existing allocation remains.</p> <p>Potential residential development of the site would have no impact on the special qualities or significance of the identified heritage assets, and any contribution made to that significance by their settings. It is considered that design and landscaping measures as mentioned above, would enhance the character of the western edge of the settlement.</p>
<b>Highways:</b>	<p>Access could be from Norwich Road via an area of land within the landowner's ownership that connects Norwich Road to land behind the residential dwellings fronting the road. An alternative access connecting the site to Willow Way could also be considered suitable.</p>
<b>Anglian Water:</b>	<p>Enhancement to the public foul sewerage network may be required, existing policy wording for LUD01/A suitably provides mitigation and can be applied to the extension also. Anglian Water's Drainage and Wastewater Management Plan identifies investment opportunities for the WRC that accommodates Ludham.</p>
<b>Nutrient Neutrality:</b>	<p>Not within Nutrient Neutrality Zone but lies adjacent to the bure catchment area.</p>

<b>Landscape:</b>	The site is situated on arable land and is bounded by residential development to the east and south. The extension to the existing allocation sites within a landscape that is flat, rural and allows for long ranging views across the site of St. Catherine's Church to south-east which should be retained, as a result of this, no development should be situated to the north-west of the larger field that this is situated within. Pound Lane abuts the site's eastern boundary and is lined with trees and hedgerows, as is School Road to the north. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	N/A
<b>Conclusion:</b>	<p>The site is an existing allocation in the Local Plan (LUD01/A) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site south of the allocation, LUD01/A and to its south-west. There are no significant constraints on-site however, the extension does remain within the setting of the Grade I listed, St. Catherine's Church. To mitigate the site's impact, an area of open space should be provided to retain the existing open views of the church from across the site area to School Road and beyond. In addition, a landscaped buffer should be provided along the extension's northern frontage that helps soften views from the north. Access will be provided by Norwich Road or Willow Way however, a pedestrian access to the existing allocation, utilising the aforementioned area of open space should also be provided to help improve connectivity between the two areas of development and the existing built form. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>

## Hoveton

<b>HV01/C Land East of Tunstead Road</b>	

<b>Conclusion from Site Assessment Booklet:</b>	The site is suitable and deliverable. The site is well connected in relation to the village centre and services and is adjacent to the high school. The site has suitable highway access and good connections to public transport. The site should also facilitate the delivery of a link road between Tunstead Road and Stalham Road and is a natural extension to the adjacent residential dwellings and the recently built Brook Park development.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Biodiversity impact uncertain; arable, mature hedgerow / trees to majority of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links,</p>

	<p>leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	<p>The site is within 2500m of the Broadland SPA/Ramsar site, 2500m of The Broads SAC and 5000m of the Greater Wash SPA . The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns. Anglian Water has previously identified an issue with surface water ingress, any future development in Hoveton will require investment into the WRC to ensure sufficient capacity.</p>
<b>Heritage Impact Assessment:</b>	<p>Both HV01/C and HV06/A may have some impact on the setting of St. Peter's Church which is situated north of these sites. The Grade II* Parish Church of St Peter is situated outside of the settlement and does not have a church tower. Views of the church are possible from the north of HV01/C, and views of the church would be retained from the track to the north. Development of HV01/C would bring residential buildings closer to the southwest of the church than currently exist but there would remain over 400 metres of separation, across an arable field. Given that there is existing residential development to the east of the site, directly south of the church, the impact of development in this location is mitigated. Retention and enhancement of landscaping to the northern edge of the site along with the retention of the existing strong landscaping to the western boundary of the site will help protect the identified heritage asset.</p>
<b>Highways:</b>	<p>Access onto Tunstead Road is acceptable as already established with existing allocation, HV01/B. However, the increase of dwellings for Hoveton on both this site and the additional site, HV06/A will require a joint Transport Assessment to be added to the policy which now supersedes the existing requirement on this site in regard the Hoveton Transport Action Plan document (as set out in Criterion 7).</p>
<b>Anglian Water:</b>	<p>Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water and set out in the representations provided by the promoter at Regulation 19.</p>
<b>Nutrient Neutrality:</b>	<p>The entirety of Hoveton lies within the <b>River Bure</b> Surface Water Catchment &amp; Foul Drainage catchment. A statutory duty on Anglian Water to upgrade Belaugh Water Recycling Centre in order to upgrade the centre to technical achievable limits by 2030 as detailed in amendments to the LURA. Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits.</p>
<b>Landscape:</b>	<p>The site is situated within arable land to the north of Hoveton. The site is bounded by residential development to the south, east and south-west. The extension to this site will progress development further northwards to abut an existing field boundary of trees and hedgerows and would result</p>

	in development wrapping around the northern edge of Brook Park. The extension also lies adjacent to the additional proposed allocation, HV06/A. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	N/A
<b>Conclusion:</b>	<p>The site is an existing allocation in the Local Plan (HV01/B) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension was discussed at the aforementioned hearing sessions and proposed as a modification to the Local Plan at that time. The extension includes no significant constraints and will extend the site northwards which may potentially have some impact on the setting of the heritage asset to the north, the Grade II* Listed Church of St Peter which lies north of St. Peter's Lane, landscape mitigation may be required to off-set any impact on this designation. Access for the site is from Tunstead Road, the extension will not require an additional access however it does provide an opportunity to provide a through connection to Stalham Road and the adjoining allocation, HV06/A. Due to the increase in development in Hoveton from this site and HV06/A, A joint Transport Assessment for both sites will be required to assess the impact on the wider road network and provide any necessary mitigation. HV01/C and HV06/A will also need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water. The Sustainability Appraisal assessed the site as Positive.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>HV06/A Land at Stalham Road</b>	
<b>Conclusion from Site Assessment Booklet:</b>	Site is considered suitable for development, but not chosen as a proposed allocation due to there being a more preferable option that meets the housing requirement. The booklet also states that the site lies within an unidentified Countryside Gap along Stalham Road.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<b>HRA:</b>	The site is within 2500m of the Broadland SPA/Ramsar site, 2500m of The Broads SAC and 5000m of the Greater Wash SPA . The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance

	and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns. Anglian Water has previously identified an issue with surface water ingress, any future development in Hoveton will require investment into the WRC to ensure sufficient capacity.
<b>Heritage Impact Assessment:</b>	Both HV01/C and HV06/A may have some impact on the setting of St. Peter's Church to the north of these sites. The Grade II* Parish Church of St Peter is situated outside of the settlement and does not have a church tower. Views of the church are possible from the north of the site. Development of HV06/A would bring residential buildings closer to the direct south of the church than currently exist, but there would be some 340 metres of separation, across an arable field. Given the existing residential development to the northeast and south of the site, which is directly to the south and southeast of the church, the impact of development at the site on the views from the church would be somewhat mitigated by the existing context. Therefore, it is considered that the development of the site for residential use would have some impact on the significance of the heritage asset, including any contribution made to that significance by its setting. Given the northern extent of the site does not abut an existing field boundary, the provision of a new soft edge to the development will help mitigate the site's impact on this heritage asset.
<b>Highways:</b>	Access onto Stalham Road is acceptable. However, the increase of dwellings for Hoveton on both this site and the additional site, HV01/B will require a joint Transport Assessment to be added to the policy which now supersedes the existing requirement on this site in regard the Hoveton Transport Action Plan document (as set out in Criterion 7 for HV01/B).
<b>Anglian Water:</b>	Both HV01/C and HV06/A will need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water and set out in the representations provided by the promoter at Regulation 19.
<b>Nutrient Neutrality:</b>	The entirety of Hoveton lies within the River Bure Surface Water Catchment & Foul Drainage catchment. A statutory duty on Anglian Water to upgrade Belaugh Water Recycling Centre in order to upgrade the centre to technical achievable limits by 2030 as detailed in amendments to the LURA. Promoters intend to provide off-site Nutrient mitigation via the purchasing of credits.
<b>Landscape:</b>	The site is situated on arable land and lies to the north of Hoveton along Stalham Road. The site is flat as is the wider landscape and is bounded by residential development to the east, south and north. The site would also be adjacent to the proposed allocation, HV01/B to the west, effectively bounding this site on all sides by development. The site extends slightly further north than HV01/B where there is no existing field boundary therefore, a soft edge would need to be established to off-set the site's impact on wider views particularly from the north. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	The original assessment for the site, as shown in the Site Assessment Booklet for Hoveton, states the site lies within an unidentified countryside gap. No designation exists and the Countryside Gap is not identified on the Local Plan's supporting Policy Maps. The site as assessed at the time,



	represented an infill development between two areas of existing built form to the north and south, both of which are included within the Hoveton Settlement Boundary therefore it cannot be considered to a countryside gap as there is no visual or physical coalescence.
<b>Conclusion:</b>	<p>There are no significant constraints on-site. Access can be achieved from Stalham Road and there is potential for vehicular and pedestrian access to connect to the adjoining allocation, HV01/C. Due to the increase in development in Hoveton from this site and HV06/A, A joint Transport Assessment for both sites will be required to assess the impact on the wider road network and provide any necessary mitigation. HV01/C and HV06/A will also need to provide foul drainage mitigation by adding a pipeline which will take foul water from both allocations and Brook Park to Belaugh Water Recycling Centre as required by Anglian Water. The site extends westwards, away from Stalham and sits slightly further north than the adjoining allocation, HV01/C. As a result, it may have some impact on the heritage asset, St Peter's Church, to the north and landscape mitigation should be sought to off-set any possible impact. The site is not considered to be a countryside gap as it does not result in coalescence and represents a suitable in-fill opportunity. There is an existing hedgerow along the site's frontage to Stalham that may need to be partially lost to provide access, the remainder should be retained and enhanced where appropriate. The Sustainability Appraisal assessed the site as Positive.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>Blakeney</b>	
<b>BLA01/B Land West of Langham Road</b>	
<b>Conclusion from Site Assessment Booklet:</b>	The site was not considered suitable for development. Development of this site would have a negative effect on the quality of landscape by reducing the rural character, extending into open countryside and would have a greater material impact on wider views, the National Landscape and historic environment than the Preferred Site.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>neutral</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; immediately adjacent SSSI (Wiveton Downs), close proximity to SSSI, SPA, SAC &amp; RAMSAR (North Norfolk Coast), National Nature Reserve (Blakeney) and local geodiversity sites (North Norfolk Coast &amp; Wiveton Downs), within Norfolk Coast National Landscape arable land with mature hedgerow / trees to majority of boundaries. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service and primary education facilities, limited leisure and cultural opportunities, public transport links mainly rely on Coastal Hopper.</p> <p><b>Economic</b> – Scores neutral; edge of settlement, some access to employment, educational facilities, services / facilities. High speed broadband in vicinity, limited transport links. Could support local services.</p>

<b>HRA:</b>	<p>Within 1000m of the North Norfolk Coast SAC/SPA/Ramsar site. Within 1000m of the Wash and North Norfolk Coast SAC. Within 1000m of the Greater Wash SPA. The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.</p>
<b>Heritage Impact Assessment:</b>	<p>A Scheduled Monument, two Bowl Barrows is present on Blakeney Downs, some 230 metres to the west of the site. The Scheduled Monument is screened from the site by Kettle Hill and along with the presence of some intervening properties, there would be little direct impact on the significance of this heritage asset, but there would be some impact, albeit modest, on its setting within Blakeney Downs and Kettle Hill, as development on the site would be immediately adjacent to this SSSI.</p> <p>The HIA concludes that the site could be retained subject to policy requirements and updated development considerations which must include careful consideration of the layout and scale of any residential development on the western edge of the site.</p>
<b>Highways:</b>	<p>Access onto Langham Road is acceptable with local footway improvement included, but no vehicular access is supported from Morston Road to the north.</p>
<b>Anglian Water:</b>	<p>No concerns raised through Regulation 19 representations or identified within the Council's Infrastructure Delivery Plan.</p>
<b>Nutrient Neutrality:</b>	<p>Not within a nutrient zone.</p>
<b>Landscape:</b>	<p>Is within the Norfolk Coast National Landscape. Justification for the Local Plan's need to include allocations in the National Landscape is set out in the Council's Matter 5 statement. [Examination reference EH011 (a)(1)] The Norfolk Coast National landscape has a striking diversity of scenery, embracing a rich mix of coastal features (marshes in Blakeney), contrasting inland agricultural landscapes, woodlands and villages, all of which are influenced to a greater or lesser degree by the proximity of the sea.</p> <p>The site is within the Rolling Heath and Arable landscape character area, which is characterised by a predominantly elevated, open rolling landscape with a strong coastal influence.</p> <p>The key views of Blakeney would be from the Morston Road to the west and from Langham Road to the southwest of the village. There is only a relatively narrow strip of land that extends down to the Morston Road. The majority of the site is set back from the road and with Kettle Hill to the west of the site, residential development would only be visible from a shorter distance from the west. The view from Langham Road looking northwest provides magnificent views of Blakeney Marshes and Blakeney Downs/ Kettle Hill. The site can be viewed from the Langham Road on the southern approach into Blakeney and on the public right of way that runs from Langham Road along Blakeney Downs.</p>

	<p>The site rises by approximately 11.5m from the low laying properties to the north towards the southern edge of the site where it has a boundary with the Blakeney Downs. Development on the entire field would change the existing character of the land from an arable field to an urban, edge of settlement, residential development.</p> <p>Residential development that would be provided on the entirety of the field that the site is situated within would have a high level of detrimental impact on the character of the Langham Road approach and would have a high detrimental impact on the wider character of the southern part of Blakeney as the open farmland set against the village and coastal marsh view would be lost. Therefore, only a smaller area of the land available, abutting the existing built form should be developed. It is important that any development on this site takes into account the site's impact on the western and southern views and development should include mitigation that incorporates the enhancement of existing natural buffers and the provision of new landscape buffering in conjunction with open space that limits the extent of the development and ensure the built form is kept within the existing built form along Morston Road and the residential development to the east. Although clearly a significant development in the context of the existing settlement, it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area. With the inclusion of this necessary mitigation and sympathetic design of residential development, the site would not significantly impact on the special qualities of the National Landscape.</p>
<b>Other:</b>	N/A
<b>Conclusion:</b>	<p>There are no significant constraints on-site however, the site does lie entirely within the Norfolk Coast National Landscape. Mitigation will be required, and development should be located to the north-east of site, immediately adjacent to the existing built form in order to limit the site's impact on this designation and landscape mitigation along the western boundaries will off-set the site's impact on wider views from the west. This will also help mitigate any impact on the setting of two heritage assets that lie to the west of the site. The original conclusion set out in the Site Assessment Booklet is based on a larger site (BLA01/A) that could have provided a higher capacity. It is considered that a smaller portion (as now being promoted through BLA01/B) is suitable and can alleviate the concerns mentioned above through appropriate mitigation schemes. Access to the site can be achieved from Langham Road where a new footway will be required to connect the access to the existing built form. No vehicular access should be provided from Morston Road. The Sustainability Appraisal assessed the site as Neutral, with a mixed score for environmental impacts.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>

Briston	
BRI02/C Land at Astley Primary School	
<b>Conclusion from Site Assessment Booklet:</b>	The site is suitable, available and deliverable. It is well contained within the landscape with development either side of the site along the road frontage. The site is well integrated to village facilities within both Briston and Melton Constable and has good access to the primary school which is adjacent to the site and is on the bus route for the High school. Consideration should be given to landscaping along the road frontage. It is considered one of the most suitable sites for Briston and Melton Constable.
<b>Sustainability Appraisal:</b>	Overall the site scores as <b>positive</b> <b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity CWS (Briston Gorse), arable land, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land. <b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, primary education facilities, peak time public transport links and limited leisure and cultural opportunities. <b>Economic</b> – Scores mixed; edge of settlement, some access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Could support local services.
<b>HRA:</b>	Within 5000m Norfolk Valley Fens SAC. The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	Limited impact on the historic environment, development proposals should have regard to the policy requirements set out in the Site-Specific policy.
<b>Highways:</b>	Access onto Fakenham is already established through the existing allocation. Access to the extension will be through BRI02 north of the extension.
<b>Anglian Water:</b>	The draft DWMP identified the use of mixed strategies including the use SUDs in any development within the plan a period (up to 2035) and a longer-term strategy beyond the plan period of reducing surface water intake by 50% to the network to improve WRC capacity.
<b>Nutrient Neutrality:</b>	Intend to address nutrient neutrality by providing mitigation within the Landowner's ownership on land on the farm which is located on the upper reaches of the Bure system.
<b>Landscape:</b>	The site is situated on arable land and is bounded by the school to the east and residential development to the west. The extension to this proposed allocation is flat and will progress development further south and south-eastwards, effectively wrapping around the school and abutting an existing field boundary which should be retained to off-set the site's impact on long ranging views from the south. Not within the Norfolk Coast National Landscape.

<b>Other:</b>	N/A
<b>Conclusion:</b>	<p>The site is an extension to an existing allocation in the Local Plan (BRI02) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site southwards and wrap around the existing school. Development will need to be situated to the north of the extension to provide a comprehensive design with the existing proposed allocation, BRI02, and provide open space/landscape mitigation that will help off-set impacts on wider views from the south. Access via Fakenham Road is already established via BRI02, no additional access is required. The Sustainability Appraisal assessed the site as Positive.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>
<b>Mundesley</b>	
<b>MUN03/A Land off Cromer Road &amp; Church Lane</b>	
<b>Conclusion from Site Assessment Booklet:</b>	This area was considered as an option prior to preparation of the Regulation 18 consultation plan and performed well through the Sustainability Appraisal and site Assessment processes reflecting its relatively integrated location and minimal environmental constraints.
<b>Sustainability Appraisal:</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Adjacent CERZ (northern boundary). Potential to affect setting of Grade II Listed Building (Church of All Saints) and CA. Potential for remediation of contamination. Potential negative biodiversity impact; close proximity CWS (Mundesley Cliffs), arable / grazing land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores mixed; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, some leisure and cultural opportunities. Could result in loss of designated open land area.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment and transport links and to some educational facilities and other services / facilities. Access to high-speed broadband uncertain. Could support local services.</p>
<b>HRA:</b>	The site is identified as having the potential for triggering likely significant effects in relation to recreational pressures. The Appropriate Assessment however concludes that the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GIRAMS provides the means to address cumulative effects from recreation and ensures adequate mitigation is secured to address recreational concerns.
<b>Heritage Impact Assessment:</b>	Part of the existing allocation (MUN03/B) is adjacent to the Conservation Area and situated to the southwest of the Grade II listed All Saint's church. The extension will need to consider wider views of the All Saint's Church, particularly views from Church Lane.

<b>Highways:</b>	Access for the extended area onto Church Lane is achievable. There is a significant difference in levels between the site and Links Road and any work to address this may impact the capacity of the site.
<b>Anglian Water:</b>	Anglian Water's Drainage and Wastewater Management Plan identifies investment opportunities for the WRC that accommodates Mundesley. Anglian Water confirm (Regulation 19 response) to the proposed submission Local plan (Jan 2021) that If required investment at Mundesley could increase capacity in AMP8 (2025-30). Anglian Water's AMP8 plans could be brought forward early in AMP7, (2020 – 2025) to support confirmed growth allocations when the Local Plan is adopted.
<b>Nutrient Neutrality:</b>	Not within a Nutrient Zone.
<b>Landscape:</b>	The site is situated on arable land and rises in elevation from Church Lane to Cromer Road. The site is bounded by residential development to the north, east and south, a holiday park lies further west. An old railway embankment intersects the site and separates the residential area of the extension to the existing allocation, MUN03/B. This embankment should be retained and enhanced. The extension to the site will progress development southwards towards the junction between Church Lane and Links Road where the elevation is not as severe however Links Road does sit above the level of the land abutting it. A mature tree belt bounds the site to the west which should be retained to limit views of the site from west. The site is not within the Norfolk Coast National Landscape.
<b>Other:</b>	N/A
<b>Conclusion:</b>	<p>There are no significant constraints on-site. The site is an extension to the existing allocation in the Local Plan (MUN03/B) and its principle has already been established through the previous Public Examination Hearing Sessions that took place in January-March 2024. The extension will extend the site westwards to incorporate an unused railway embankment and land to the south-west, adjacent to Church Lane. The extension's western boundary forms an existing tree belt that should be retained and enhanced to mitigate wider views from the west. Access to the extension will be from Church Lane along the site's southern frontage where pedestrian access will also need to be established. Access should not be provided onto Links Road due to the differing elevations. The railway embankment provides an opportunity to provide an area of open space that can link to the areas of development together to provide a more comprehensive scheme. The Sustainability Appraisal assessed the site as Positive and Mixed for environmental impacts.</p> <p>The site is suitable, available and deliverable. It lies within single ownership.</p>

## Appendix 2

### Historic Impact Assessment: Additional & Revised Sites

Historic Impact Assessments (HIAs) for the additional sites C10/1, NW16, ST19, MUN03/A are contained in Examination document reference C10. The HIAs for sites C22/4, ST04/A, LUD01/C, HV01/C, HV06/A, BLA01/B and BRI02/C are contained in this appendix.

#### C22/4: Land West of Pine Tree Farm

<b>Site Reference</b>	C22/4
<b>Site Location</b>	Land West of Pine Tree Farm
<b>Buffer Zone</b>	500m

#### Stage 1: Desktop Assessment

<b>Heritage Asset</b>	<b>Within site/ within 500m buffer/ beyond buffer</b>	<b>Name and Location</b>
<b>Listed Building</b>	<b>Within 500m buffer</b>  <b>Beyond buffer</b>	12. Grade II Listed - Pine Tree Farmhouse, Cromer Road  2. Grade II Listed - Cromer Lodge (South) 4. Grade II Listed - Felbrigg Lodge (North) 5. Grade II Listed - Felbrigg Lodge (South) 7. Grade II Listed - 14-15 The Green, Felbrigg including front garden area walls. 8. Grade II Listed - Felbrigg War Memorial, Village Green 9. Grade II Listed - Old Mill House, Old Mill Road, Roughton 10. Grade II Listed - Windmill, Old Mill Road, Roughton 13. Grade II Listed - Northrepps Hall, Hall Road 14. Grade II Listed - Northrepps Cottage, Northrepps Road 16. Grade II Listed, Overstrand Hall, Cromer Road 18. Grade II* Listed - Church of St. Martin, Cromer Road, Overstrand 19. Grade II Listed - Overstrand War Memorial, St. Martins Churchyard, Cromer Road
<b>Conservation Area (CA)</b>	<b>Beyond buffer</b>	6. Felbrigg 15. Overstrand 20. Northrepps
<b>Scheduled Monument</b>	<b>Beyond buffer</b>	11. Tumuli on Roughton Heath
<b>Historic Park and Garden</b>	<b>Beyond buffer</b>	1. Ungraded, Cromer Hall & Stables, Hall Road 3. Grade II* Historic Park & Garden - Felbrigg Hall 17. Ungraded, Overstrand Hall, Cromer Road
<b>Locally Listed Building</b>	<b>None</b>	



## Stage 2: Site Survey

### Site Description (Including form and character, materials, massing and scale)

This site is made up of several adjoining arable fields to the south of Cromer which border residential development to the northern and part of the eastern boundaries. There is also established woodland central to the site, known as Beckett's Plantation, a belt of trees running between two of the fields, as well as hedgerows, some of which are interspersed with trees, marking the existing field boundaries. The railway line runs along the north-eastern boundary of the site, which is also screened by a belt of trees.

The site is within the Norfolk Coast National Landscape (NCNL) and is visible from the south (along the A149 main road) and west (along Roughton Road) and the immediate surrounding area.

Although clearly a significant development in the context of the existing town it is considered that development of the site would appear as a natural extension to the settlement and could be carefully designed to minimise any adverse effect on the wider landscape and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area.

### Designated heritage asset(s) on site?

None.

### If yes, what is the impact on designated heritage asset(s) in terms of significance and setting

N/A

### Designated heritage asset(s) within the vicinity of the site?

#### Within 500m buffer

12. Pine Tree Farmhouse, Cromer Road Grade II listed house. Probably C17 in part, with roof raised and additions made in late C18. Painted flint and brick; Belgian tile roof. Rectangular in plan, with extensions to rear under catslide roofs. 4 bay, 2 storey facade. Ground floor left hand 2 bays of brick then flint walling with brick dressings to the remainder. Rendered plinth to 2 left hand bays. The site effectively envelops the property on the north, west and part of the south sides, where there is approximately 80 metres between the building and the eastern boundary of the site.

#### Beyond buffer

2. Cromer Lodge (South) Grade II listed lodge. 1841 on gutter head. J.C. and G. Buckler for William Howe Windham. Tudor style. Brick with stone dressings. Shingle roof. 2-cell plan. East (road) front gabled. Brick plinth. Located approximately 800 metres to the northwest of the site.

3. Felbrigg Hall Grade II\* Historic Park and Garden. Park and woodland developed throughout the C18 from an earlier deer park, possibly at the hand of Humphry Repton, surrounding a C17 Jacobean mansion with C19 gardens simplified in the late C20. Located over 1.6 km to the west of the site.

4. Felbrigg Lodge (North) Grade II listed G.V. II Lodge. 1841 on gutter head. J.C. and G. Buckler for William Howe Windham. Tudor style. Brick with stone dressings. Shingle roof. 2-cell plan. East (road) front gabled. Brick plinth. Located over 1.4 km to the west of the site.

5. Felbrigg Lodge (South) Grade II listed lodge. 1841 on gutter head. J.C. and G. Buckler for William Howe Windham. Tudor style. Brick with stone dressings. Shingle roof. 2-cell plan. East (road) front gabled. Brick plinth. Located over 1.3 km to the west of the site.

6. Felbrigg CA, where the easternmost part is over 1 km to the southwest of the site.

7. No's 14-15 The Green, including front garden area walls. Pair of Grade II listed attached cottages. Dated 1777, extended in C19. Flint cobbles with red brick dressings including quoins and

window and door surrounds. Steeply pitched pantile roof with tiled raised gable ends and corbelled brick modillion eaves course. Gable end stacks with brick shafts. Located over 1.2 km to the southwest of the site.

8. Felbrigg War Memorial, Village Green, a Grade II listed stone memorial is located on Felbrigg Green. It comprises a Latin cross with, at the intersection of the cross arms, a sunburst and coronet carved in low relief. The cross rises from a pedestal, square on plan that stands on a single step. The top of the pedestal is moulded, forming a shouldered blind arch to each face. Located over 1.1 km to the southwest of the site.

9. Old Mill House, Old Mill Road, Roughton, Grade II listed house. Early C19. Galleted flint with rendered brick dressings. Glazed black pantile roof. Facade of 4 bays, 2 storeys. Located approximately 760 metres to the southwest of the site.

10. Windmill, Old Mill Road, Roughton Grade II listed Windmill Tower mill disused. Dated 1814 on keystone over window. Brick. Circular on plan. 5 storey tapering column. All windows and doors of c1980 in segmental arched openings. Burned out in 1906. Located approximately 730 metres to the southwest of the site.

11. Tumuli on Roughton Heath including Hare's Hill and Two Hills, located approximately 920 metres to the southwest of the site.

13. Northrepps Hall, Hall Road is a Grade II Listed house, C17 adapted and enlarged C18 and C19. Brick, flint with brick dressings. Tile and pantile roofs. It is located approximately 510 metres to the east of the site.

14. Northrepps Cottage, Northrepps Road, is a Grade II Listed house, now a restaurant. Dated 1793 B.G. on datestone. By William Wilkins, Senior for Bartlett Gurney. Coursed flint with galleting, painted brick dressings. Pantile and tile roofs. Located over 1.2 km to the east of the site.

15. Overstrand Conservation Area, where its southwestern boundary is located over 1.5 km to the northeast of the site.

16. Overstrand Hall, Cromer Road is Grade II listed and is a large house, which used to be a convalescent home and is now a family residence. Circa 1899 by Sir Edwin Lutyens for second Lord Hillingdon. Flint with brick, tile and stone dressings, tiles and a tile roof. It is located over 1.6 km to the northeast of the site.

18. Church of St. Martin, Cromer Road, Overstrand. Grade II\* listed Parish church. Medieval, restored from ruin in early C20. Quaternary and Quarry flint and chert with Lincolnshire Limestone and brick dressings. Slate roofs. West tower, nave, north aisle, chancel, south porch. Located over 1.6 km to the northeast of the site.

19. Overstrand War Memorial, St. Martins Churchyard, Cromer Road is Grade II listed. It comprises a 5m tall Clipsham stone wheel-head cross, pierced and cusped, atop a slender octagonal shaft with moulded collar and foot, surmounting a pentagonal plinth and three-stepped base. Located approximately 1.6 km to the northeast of the site.

20. Northrepps Conservation Area, where its western extent is located approximately 2 km to the southeast of the site.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

**Within 500m buffer**

To the East

12. Pine Tree Farmhouse, Cromer Road is situated in close proximity to the site. The farmhouse is orientated east and west, where the principal elevation of the farmhouse is, facing east, away from the site. There are other non-designated buildings at the address that do not appear to form part of the Grade II listing, which appear to largely envelop the north, west and southern sides of the listed farmhouse. Therefore, any potential residential development of the site is likely to reinforce the cumulative perception of enclosure, in regard to the setting of the farmhouse. However, the existing buildings, some of which appear to be former farm buildings,

along with landscaping, would screen the listed building from the site to the north, south and west.

Overall, the impact to the significance of this heritage asset, including any contribution made to that significance by its setting, would amount to **very modest harm**.

#### **Beyond buffer**

##### To the Northwest

2. Cromer Lodge (South) is located approximately 800 metres away from the site. Given the significant distance, topography and intervening buildings and landscaping, any potential residential development of the site would have **no impact** on the significance of this non-designated asset including any contribution made to the significance by its setting.

##### To the West

No's 3. Felbrigg Hall, 4. & 5. Felbrigg Lodges North and South, 6. Felbrigg CA and 7. No's 14-15 The Green and 8. Felbrigg War Memorial, both in the village of Felbrigg. These heritage assets are located between 1 km and 1.7 km away from the site. Given the significant distances, intervening landscaping, topography and buildings, any potential residential development of the site would have **no impact** on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.

##### To the Southwest

9. Old Mill House, Old Mill Road, 10. Windmill, Old Mill Road in Roughton and 11. Tumuli on Roughton Heath are located a minimum of some 730 metres away from the site. Given the significant distances, intervening landscaping, topography and buildings, any potential residential development of the site would have **no impact** on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings

##### To the East and Northeast

13. Northrepps Hall, Hall Road and 14. Northrepps Cottage, Northrepps Road are located 510 metres and 1.2 km respectively away from the site. Given the distances, intervening railway line, topography and landscaping, any potential residential development of the site would have **no impact** on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.

15. Overstrand CA, 16. Overstrand Hall, Cromer Road and 18. Church of St. Martin, Cromer Road, Overstrand are located a minimum of 1.5km away from the site. Given the significant distances, intervening landscaping, topography and buildings, any potential residential development of the site would have **no impact** on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.

##### To the Southeast

20. Northrepps CA is located approximately 1.9 km away from the site. Given the significant distance, intervening landscaping, topography and buildings, any potential residential development of the site would have **no impact** on the special qualities or significance of this heritage asset including any contribution made to the significance by its setting.

<b>Non-designated heritage asset(s) on site?</b>
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None.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Non-designated heritage asset(s) within the vicinity of the site?</b>
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<u>Beyond buffer</u>
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1. Cromer Hall & Stables, Hall Road, is an ungraded park and garden, where its southeastern edge is situated approximately 800 metres to the northwest of the site.
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17. Overstrand Hall, Cromer Road, is an ungraded park and garden, which is located over 1.5 km to the northeast of the site.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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<u>Beyond buffer</u>
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<u>To the Northwest</u>
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1. the southeastern edge of Cromer Hall & Stables, Hall Road is situated approximately 800 metres away from the site. Taking account of the distance, intervening landscaping, topography and buildings, any potential residential development would have <b>no impact</b> upon the special qualities or significance of this ungraded park and garden including any contribution made to the significance by its setting.
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<u>To the Northeast</u>
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17. Overstrand Hall, Cromer Road is situated over 1.5 km from the site. Taking account of the significant distance, intervening landscaping, topography and buildings, there would be <b>no impact</b> upon the special qualities or significance of this locally listed building including any contribution made to the significance by its setting.
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<b>Landscape Impact (including key views and topography)</b>
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The site is generally flat overall but appears to rise toward the northeast corner. The key views would be from the main A149 Cromer Road when travelling towards Cromer, where several views of the site are possible when looking north-westward. There are also likely to be some views when travelling along the Roughton Road though gaps in the existing field boundaries. There may be some longer distance views from Carr Lane to the south of the site.
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<b>Prominent trees and other natural landscape features (both within and adjacent to the site)</b>
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The area of trees known as Beckett's Plantation, as well as the significant tree belt and hedgerow that runs between fields on the eastern part of the site. There are also established hedgerows, some of which are interspersed by mature trees, that mark most of the existing field boundaries. The railway line runs along the north-eastern boundary of the site, which is also screened by an established tree belt.
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Beckett's Plantation is a feature that needs to be retained and enhanced.
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### Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement

**Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.**

Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including Pine Tree Farmhouse, a grade II listed building. Development should include the following mitigation measures:

- Retaining and strengthening existing hedges/ trees around and within the site and incorporating new tree planting within the site
- Introducing landscape buffers to the southern and western boundaries of the site
- Dwellings of one or one and a half storey height on the southernmost part of the site.

**Enhancement: What are the potential opportunities for the enhancement of the historic environment?**

There are no designated heritage assets on site. However, the site surrounds 3 sides of the Grade II listed Pine Tree Farmhouse. Any development of the site therefore has the potential to impact the setting of the grade II listed building. Several designated heritage assets are also identified further afield, however given the significant distances the HIA concludes in relation to these that development of the site would have **no impact** on the special qualities or significance of these heritage assets including any contribution made to their significance by their settings.

**Stage 4: Evaluating Impact**

**Conclusions and Rag Rating**

	Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 3.
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**ST04/A: Land at Brumstead Road, Stalham**

<b>Site Reference</b>	ST04/A
<b>Site Location</b>	Land at Brumstead Road, Stalham
<b>Buffer Zone</b>	500m

**Stage 1: Desktop Assessment**

Heritage Asset	Within site/ within 500m buffer/ beyond buffer	Name and Location
<b>Listed Building</b>	<b>Within 500m buffer</b>	2. Grade II * Listed - Church of St Mary the Virgin, High Street
	<b>Beyond buffer</b>	3. Grade II Listed - Fire Engine House & Village Lock Up 4. Grade II Listed - House, Rosedale , High Street 5. Grade II Listed - Stable Block, Church Farm, Old Yarmouth Road

		<p>6. Grade II Listed - Church Farmhouse, Old Yarmouth Road</p> <p>7. Grade II Listed – West End Farmhouse, Chapel Field Road</p> <p>Not numbered: Shown to the southeast on the map, Grade II Listed Barn at Stalham Hall Farm, Old Yarmouth Road and the adjacent Grade II Listed Stewards House, Old Yarmouth Road.</p> <p>Shown to the northeast on the map, Grade II * Listed Barn at Grange Farm, Grove Road, Ingham</p> <p>Outside of the map extent: Grade II Listed Church of St Peter lies approximately 1km to the north of the site, along with a Grade II Listed Memorial, 4 metres south of the nave of the church.</p>
<b>Conservation Area</b>	<b>Partially within the 500m buffer</b>	1. Stalham Conservation Area
<b>Scheduled Monument</b>	<b>None</b>	
<b>Historic Park and Garden</b>	<b>None</b>	
<b>Locally Listed Building</b>	<b>None</b>	

## Stage 2: Site Survey

<b>Site Description (Including form and character, materials, massing and scale)</b>
<p>This is a greenfield site located on the northern edge of the settlement. It lies within a flat landscape that is intersected by well-established hedgerows and mature tree belts that break up long ranging views. The site is bounded to the south by built development, with a mature hedgerow alongside the frontage of Lyndford Road. Mature rural hedgerow, interspersed with trees, exists along the site's frontage with Brumstead Road. On the opposite side of the road lies built development which forms the existing settlement edge.</p>

<b>Designated heritage asset(s) on site ?</b>
None.

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Designated heritage asset(s) within the vicinity of the site?</b>
<p><u>To the South</u></p> <p>1. Stalham Conservation Area is situated approximately 420 metres to the south of the site.</p> <p>2. Grade II* Listed Church of St Mary the Virgin dates back to the 14<sup>th</sup> Century. Whilst being situated approximately 500 metres south of the site, the church tower is prominent within the village, particularly views along High Street and Ingham Road.</p> <p><u>To the Southeast</u></p>

3. Grade II Listed Fire Engine House & Village Lock Up. The Lock Up is dated 1820 and the Engine House is dated 1833. The Fire Engine House and Village Lock Up is located some 560 metres southeast of the site, separated by significant levels of intervening development.

4. Grade II Listed House, Rosedale, dates from circa 1800. The listed building is located some 610 metres southeast of the site.

5. Grade II Listed Stable Block at Church Farm dates from the 18<sup>th</sup> Century and is listed for its group value. The listed stable is located some 660 metres from the site to the southeast.

6. Grade II Listed Church Farmhouse is dated 1811. The listed building is approximately 700 metres to the southeast of the site.

Not numbered. Grade II Listed Barn at Stalham Hall Farm, Old Yarmouth Road and the adjacent Grade II Listed Stewards House, Old Yarmouth Road. These listed buildings are approximately 980 metres southeast of the site.

#### To the Southwest

7. Grade II Listed West End Farmhouse, dates from the late 17<sup>th</sup> or early 18<sup>th</sup> Century. The listed building is located some 700 metres to the southwest of the site.

#### To the North

Outside of the map extent: Grade II Listed Church of St Peter lies approximately 1 km to the north of the site, along with a Grade II Listed Memorial, 4 metres south of the nave of the church.

#### To the East

Not numbered. Grade II \* Listed Barn at Grange Farm, Grove Road, Ingham is located approximately 1.1 km east of the site.

#### **If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

##### **Within 500m buffer**

##### **1. Stalham Conservation Area**

The closest part of the Stalham Conservation Area (CA) is approximately 420 metres to the south of the site. The CA extends from High Street to Yarmouth Road. The CA includes five Listed buildings (2, 3, 4, 5 and 6). The CA is separated from the site by previous development, and it is considered that the development of this site would have **no impact** upon the significance (including any contribution made to that significance by setting) of the CA.

##### **2. Grade II\* Listed Church of St Mary the Virgin**

The church is of more than special interest, dating back to the 14<sup>th</sup> Century, the church therefore has a rich historical interest. The church tower is prominent within the village, particularly views along High Street and Ingham Road. The church is not visible from the site and there is substantial development between the proposed site and the Listed Building. Therefore, it is considered that the development of this site would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

##### **Beyond 500m buffer**



3. Grade II Listed Fire Engine House & Village Lock Up & 4. Grade II Listed House, Rosedale

Both situated to the southeast of the site, approximately 560 metres and 610 metres respectively. Both buildings are situated within the Stalham CA but surrounded by existing development. The Fire Engine House and Village Lock up are listed for the architectural and historic interest, whilst Rosedale is listed more for its architectural interest. Given the distance of these buildings to the site, it is considered that the development of this site would have **no impact** upon the significance (including any contribution made to that significance by setting) of these heritage assets.

5. Grade II Listed Stable Block at Church Farm & 6. Grade II Listed Church Farmhouse

The two listed buildings are 660 metres and 700 metres from the site respectively. Given the distance of these buildings to the site, it is considered that the development of this site would have **no impact** upon the significance (including any contribution made to that significance by setting) of these heritage assets.

7. Grade II Listed West End Farmhouse

The listed building is located some 700 metres to the southwest of the site and is listed for its architectural and historic interest. Given the separation distance and intervening topography, between the site and this listed building, it is considered that the development of this site would have **no impact** upon the significance (including any contribution made to that significance by setting) of this heritage asset.

<b>Non-designated heritage asset(s) on site?</b>
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None.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Non-designated heritage asset(s) within the vicinity of the site?</b>
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None.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Landscape Impact (including key views and topography)</b>
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The comprises part of a larger agricultural field. It is flat and there are moderately long views of the site available in the surrounding area. However, these are broken by the presence of existing, well-established field boundaries. The south side of site abuts existing, high density, residential development. A mature hedgerow separates this site from the adjacent development.
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<b>Prominent trees and other natural landscape features (both within and adjacent to the site)</b>
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There is a tall, mature hedgerow that runs alongside the southern boundary of the site, separating it from the adjacent residential development. The hedgerow currently marks the edge of the settlement on the eastern side of Brumstead Road.
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### Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement

<b>Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.</b>
Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures, <ul style="list-style-type: none"><li>• Retention and enhancement of the existing hedgerow adjacent to Lyndford Road and the enhancement of the existing hedgerows and mature trees fronting Brumstead Road where possible</li><li>• Provision of layout, design and landscaping that respects the site's edge of town setting, including giving careful attention to building heights and materials</li><li>• Provision of a landscaped buffer along the northern boundary of the site</li></ul>

<b>Enhancement: What are the potential opportunities for the enhancement of the historic environment?</b>
N/A

### Stage 4: Evaluating Impact

<b>Conclusions and Rag Rating</b>
<div></div> Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 3.

## LUD01/C: Land South of School Road

<b>Site Reference</b>	LUD01/C
<b>Site Location</b>	Land South of School Road
<b>Buffer Zone</b>	500m

### Stage 1: Desktop Assessment

<b>Heritage Asset</b>	<b>Within site/ within 500m buffer/ beyond buffer</b>	<b>Name and Location</b>
<b>Listed Building</b>	<b>Within 500m buffer zone</b>	3. Grade II listed building, The Stores, High Street 4. Grade II listed building, Church View, Norwich Road 5. Grade II listed buildings, Former Saddler's Shop w/ Cottage, Norwich Road 6. Grade II listed buildings, No's 1-5 Yarmouth Road 7. Grade II listed, Ludham War Memorial Cross at St Catherine's Church, The churchyard, Norwich Road 8. Grade I listed building, Church of St. Catherine, Norwich Road 9. Grade II listed, F.H. Chambers Memorial at Church of St. Catherine, Norwich Road

	<b>Beyond buffer</b>	<p>1. Grade II listed building, Barn at Page's Farm, How Hill Road</p> <p>10. Article 4 Direction Womack Water: relating to permitted development restrictions, some 570 metres to the southeast.</p> <p>11. Grade II listed, Garden Wall at Ludham Hall, Hall Road</p> <p>12. Grade II* listed building, Ludham Hall inc. Chapel, Hall Road</p> <p>13. Grade II listed Barn East of Ludham Hall, Hall Road</p> <p>Not numbered on plan – Hall Common Farmhouse, Hall Common, Grade II listed farmhouse. c.1700. Brick with thatched roof. 2 storey west facade in 3 wide bays. Located approximately 1 km to the southeast</p> <p>Not numbered on plan – The Dutch House, Hall Common, Grade II listed house. Circa 1700 more than 800 metres to the southeast.</p>
<b>Conservation Area (CA)</b>	<b>Partly within 500m buffer</b>	2. Ludham Conservation Area (CA)
<b>Scheduled Monument</b>	<b>None</b>	
<b>Registered Park and Garden</b>	<b>None</b>	
<b>Locally Listed Building</b>	<b>None</b>	

## Stage 2: Site Survey

<b>Site Description (Including form and character, materials, massing and scale)</b>
<p>The site is located on the northwestern side of the village, forming part of a large arable field. The site occupies the eastern and southern portions of the field and is well integrated into the landscape. It is bordered by a mix of single and two-storey dwellings along its eastern and southern boundaries, as well as part of its northern boundary. The remaining field extends to the west and north of the site. Most of the site is situated behind existing buildings along School Road and Norwich Road. Mature hedgerow, interspersed by some trees, exists along all boundaries of the wider field.</p>

<b>Designated heritage asset(s) on site?</b>
None.

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Designated heritage asset(s) within the vicinity of the site?</b>
<p><u>Within 500 metre buffer</u></p> <p>2. Ludham CA: its closest point being located approximately 65 metres to the east of the site. The Ludham CA includes 9 listed buildings (including No's 3 to 9).</p> <p>3. The Stores, High Street, Grade II LB, early C18 is located approximately 290 metres to the east.</p>

4. Church View, Norwich Road, two houses, Grade II LB, early C19, located approximately 220 metres to the east.
5. Former Saddler's Shop with Cottage, Norwich Road, Grade II listed house and shop C18, located approximately 230 metres to the east.
6. No's 1-5 Yarmouth Road, Grade II LB, range of houses and shops mid C18, situated approximately 260 metres to the southeast.
7. Ludham War Memorial Cross, St Catherine's Church, The churchyard, Norwich Road, Grade II listed, located over 240 metres to the southeast.
8. Church of St. Catherine, Norwich Road, Grade I LB, Parish church. C14, situated approximately 190 metres to the southeast.
9. F.H. Chambers Memorial SW of South Porch of Church of St. Catherine, Norwich Road, Grade II listed memorial c.1912, located approximately 195 metres to the southeast.

Beyond 500 metre buffer

1. Barn at Page's Farm, How Hill Road. Grade II LB, early C18 situated over 800 metres to the northwest.
10. Article 4 Direction Womack Water: relating to permitted development restrictions, some 570 metres to the southeast.
11. Garden Wall at Ludham Hall, Hall Road, Grade II listed, brick garden wall to west of house. Late C17 located over 880 metres to the southwest.
12. Ludham Hall inc. Chapel, Hall Road, Grade II\* listed house with chapel, the latter used as a barn, situated some 850 metres to the southwest.
13. Barn 100 metres east of Ludham Hall, Hall Road, Grade II listed barn, early C18, located some 830 metres to the southwest.

Not numbered on plan –Hall Common Farmhouse, Hall Common, Grade II listed farmhouse. c.1700. Brick with thatched roof. 2 storey west facade in 3 wide bays. Located approximately 1 km to the southeast

Not numbered on plan – The Dutch House, Hall Common, Grade II listed house. Circa 1700 more than 800 metres to the southeast.

**If yes, what is the impact of the allocation on the significance of the designated heritage asset(s) (including any contribution made to that significance by its setting)**

**Within 500m buffer:**

To the east

3. The Stores, High Street, Grade II, listed for its special architectural or historic interest. C18 altered C20. Rendered and colour washed brick. Thatched roofs. L plan. North-south range of one storey and dormer attic. Gabled roof with external west end stack. Whilst the building sits in a prominent position at a crossroads, there are numerous intervening single and two storey buildings between the building and the site. This, in addition, to the distance, sloping topography and landscaping between the site and the building, the residential development of the site would have **no impact** upon the significance of the heritage asset including any contribution made to that significance by its setting.

To the southeast

2. Ludham CA covers a considerable area of the village but is concentrated on the historic central core and south-eastern parts of the settlement. Ludham is a well-preserved Broadland village centred on the Church of St. Catherine. Its historic core remains almost completely intact and contains many buildings of historic interest. There are some fine examples of the use of local building materials such as thatch,

pantiles, red brick, and render all of which help to define the special character of the area. Like many small villages Ludham has seen later phases of development, however this is mainly outside of the clearly identifiable historic core. The buildings within the older part of the settlement are largely unaltered as is their historic relationship with the water, which remains a defining characteristic of the village. Womack Water and the head of Staithe are key features of the village, where there is a public interface with the water. The Ludham CA includes 9 of the listed buildings mentioned (No's 3 to 9). The site is situated on the northwestern edge of the village, where the closest part of the CA is approximately 65 metres to the east of the site. Given the distance and the intervening buildings and landscaping, residential development of the site would have **no impact** upon the significance of the special qualities of the Conservation Area, including any contribution made to that significance by its setting.

4. Church View, Norwich Road, is formed by two Grade II listed houses of two storeys and basement, that were listed for their special architectural or historic interest. Situated approximately 220 metres to the east of the site. Described as being early C19. Brick with roof of black glazed pantiles. Two storeys and basement. Two central doors with rounded glazed lights below C20 flat porch hood. One sash window left and right with glazing bars and gauged skewback arches. Two sashes to first floor with glazing bars. Gabled roof. Internal gable end stacks. Given the distance, sloping topography and numerous intervening buildings and landscaping between the site and the houses, the potential residential development of the site would have **no impact** upon the significance (including any contribution made to that significance by the setting) of this heritage asset.

5. Former Saddler's Shop with Cottage, Norwich Road, a Grade II listed house and shop C18, whitewashed brick and thatched roof, one storey and dormer attic, which was listed for its special architectural or historic interest and located approximately 230 metres away from the site. Given the distance, sloping topography and numerous intervening buildings and landscaping between the site and the houses, the potential residential development of the site would have **no impact** upon the significance (including any contribution made to that significance by the setting) of this heritage asset.

6. No's 1-5 Yarmouth Road is a range of houses and shops, mid C18, whitewashed brick and thatch, of uniform height but either one or two storeys with dormer attic. Grade II listed for their special architectural or historic interest, situated approximately 260 metres away from the site. Given the distance, sloping topography and numerous intervening buildings and landscaping between the site and the buildings, the potential residential development of the site would have **no impact** upon their significance (including any contribution made to that significance by their setting) of these heritage assets.

7. Ludham War Memorial Cross is located in the churchyard of St Catherine's Church, Norwich Road comprises of a polished red granite wheel-head cross riding from a tapering plinth that stands on a single-stepped red granite base. It commemorates those lost in WWI and WWII. It is grade II listed for its special architectural interest (a simple yet poignant granite cross, in the Celtic style), historic interest (as an eloquent witness to the tragic impact of world events on the local community, and the sacrifice it made in the conflicts of the C20) and group value (with the Church of St Catherine (Grade I) and nearby Grade II-listed buildings including Church View and Saddlers Shop with cottage adjoining to West), located over 240 metres away from the site. Given the distance, sloping topography and numerous intervening buildings and

landscaping between the site and the war memorial, the potential residential development of the site would have **no impact** upon the significance (including any contribution made to that significance by the setting) of this heritage asset.

8. Church of St. Catherine, Norwich Road is a grade I listed Parish church. C14 west tower and chancel. Nave and aisles C15, bequests to new work date from 1466 when tower also altered. Restored 1861 and 1891. Quaternary and Quarry Flint with Lincolnshire Limestone and Bath Stone ashlar dressings and some brickwork. Chancel roof of slate, remainder of lead. Three stage tower with diagonal west buttresses and side east buttresses. Listed for its special architectural or historic interest, the church tower is visible as part of a landscaped skyline from the site and from considerable distances further to the west along School Road and north from Goffins Lane. Given that the position of the site is tucked behind existing dwellings on the south side of School Road, the site visit confirmed that it would only be shorter distance views of the church tower from School Road that may be curtailed by residential development. As such, the residential development of the site would have **no impact** upon the significance of this heritage asset including any contribution made to that significance by its setting. However, there would be some impact to shorter distance views of the church tower from School Road, as a result of residential development on the site.

9. F.H. Chambers Memorial is located approximately 50 metres to the southwest of the south porch of Church of St. Catherine, Norwich Road. It is a memorial, c.1912, by C.F.A. Voysey for the family of Frank Harding Chambers. It is listed as being a fine quality simple memorial by one of the leading architects of the Arts and Crafts movement, being grade II listed for its special architectural or historic interest. Given the numerous intervening properties and existing landscaping, any potential residential development of the site would have **no impact** upon the significance of this heritage asset including any contribution made to that significance by its setting.

#### **Beyond 500m buffer:**

##### To the northwest

1. Barn at Page's Farm, How Hill Road is an early C18 barn of brick with a roof of corrugated asbestos. It is grade II listed for its special architectural or historic interest. Given the 800m distance between the heritage asset and the site and the intervening landscaping and buildings, the residential development of the site would have **no impact** upon the significance of this heritage asset, including any contribution made to that significance by its setting.

##### To the southwest

11. 12. and 13. relate to Ludham Hall inc. Chapel and separately listed garden wall and barn, Hall Road. The house and chapel are Grade II\* listed and the wall and barn are grade II listed. All are listed for their special architectural or historic interest. Given that the listed buildings are over 830 metres from the site and that there are some intervening properties (located on Norwich Road) and mature landscaping, the residential development of the site would have **no impact** upon the significance of these heritage assets, including any contribution made to that significance by their settings.

Hall Common Farmhouse and the Dutch House, Hall Common are two grade II listed buildings not numbered on the plan. These were both listed for their special architectural or historic interest. Given their distance from the site over 830 metres and the intervening buildings and landscaping, there would be no impact on the

significance of these heritage assets including any contribution made to that significance by the settings of these two listed buildings.

10. Article 4 Direction Womack Water. This relates to permitted development restrictions and as such, does not impact upon the potential development of the site with regards to any heritage impact.

<b>Non-designated heritage asset(s) on site?</b>
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None.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Non-designated heritage asset(s) within the vicinity of the site?</b>
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None.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Landscape Impact (including key views and topography)</b>
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The site is currently part of a larger arable field that is raised up from School Road by approximately 600mm at the eastern end, which tapers down to being road level at its north western corner (adjacent to Pound Lane) and there is a narrow verge and no footpath along this entire section of School Road. The site also slopes gently down to the southeastern corner.

The church tower of St. Catherine's, Norwich Road is visible within a mature landscaped skyline from the site and from considerable distances further to the west along School Road and north from Goffins Lane. The landscaped skyline looking southeast from the site is largely formed by woodland to the north of and surrounding Womack Water.

The site itself is partially tucked behind existing dwellings on the south side of School Road and would be viewed against these dwellings and the existing dwellings to the east and south of the site. A site visit confirmed that it would be only shorter distance views of the church from School Road that may be curtailed by residential development on the western side of the site.

Given the above, it is likely that the potential residential development of the site would cause some modest harm to the views of the church tower from the northwest.

<b>Prominent trees and other natural landscape features (both within and adjacent to the site)</b>
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Open fields bound the site on its main western and northern sides. There is some existing hedging and trees on the lesser north boundary and along the eastern and southern sides of the site. Mature hedgerow, interspersed by some trees, exists along the western and northern area of the wider host field. The distant landscaped skyline looking southeast from the site is largely formed by woodland to the north of and surrounding Womack Water.

### Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement



**Avoiding Harm: Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.**

Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including account taken of the long-distance view of the church tower of St. Catherine's, a Grade I listed building. Development should include the following mitigation measures:

- Respect and reflect the massing and heights of surrounding dwellings. Single and/or one and a half storey dwellings should be located on the western edge of the site;
- Significant landscaping should be provided on the main western and northern boundaries of the site.

**Enhancement: What are the potential opportunities for the enhancement of the historic environment?**

Potential residential development of the site would have no impact on the special qualities or significance of the heritage assets, and any contribution made to that significance by their settings. As such, it is considered that design and landscaping measures as mentioned above, would enhance the character of the western edge of the settlement.

**Stage 4: Evaluating Impact**

**Conclusions and Rag Rating**

Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 3.

**HV01/C Land East of Tunstead Road**

<b>Site Reference</b>	HV01/C
<b>Site Location</b>	Land East of Tunstead Road
<b>Buffer Zone</b>	500m

**Stage 1: Desktop Assessment**

<b>Heritage Asset</b>	<b>Within the site / Within the 500m buffer/ beyond the 500m buffer</b>	<b>Name and Location</b> [heritage assets numbered in accordance with details on assessment map for HV01/B in HIA Paper 10 (Exam. Ref. C10 - July 2022)]
<b>Listed Building</b>	<b>All beyond the 500m buffer</b>	2. Grade II Listed Greenhouse at Hoveton Hall 3. Grade II Listed Stable Block at Hoveton Hall 4. Grade II Listed Hoveton Hall 5. Grade II * Listed Church of St Peter 6. Grade II Listed Ice House in Ice Well Wood 7. Grade II Listed Wroxham Signal Box 11. Grade II Listed Church of St John
<b>Conservation Area</b>	<b>None</b>	
<b>Scheduled Ancient Monument</b>	<b>Beyond the 500m buffer</b>	8. Wroxham Bridge

<b>Registered Park and Garden</b>	<b>Just within the 500m buffer</b>	1. Ungraded Hoveton Hall Park and Garden
<b>Locally Listed Building</b>	<b>None</b>	
	<b>Beyond the 500m buffer</b>	9. Article 4 Direction (Art4/00/009) 10. Article 4 Direction (Broadland District)

## Stage 2: Site Survey

<b>Site Description (Including form and character, materials, massing and scale)</b>
<p>The site is comprised of an agricultural field on the edge of Hoveton, to the north of the village, east of Tunstead Road. The site is predominately flat. There is a significant established hedgerow bordering the western boundary of the site which continues beyond the site extent alongside the Tunstead Road to St Peter's Lane and beyond. Parts of other of the site's boundaries also consist of rural hedgerow, with some intermittent trees present along the northern boundary. The site is currently in arable use and other than the boundary hedgerows and trees, it lacks other specific landscape features.</p> <p>Adjacent land to the east has been recently developed for residential purposes. To the south are the school playing fields with Broadland High School beyond. Existing residential development is situated to the west of the site (across the Tunstead Road). The land to the north comprises further agricultural land.</p>

<b>Designated heritage asset(s) on site?</b>
None

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Designated heritage asset(s) within the vicinity of the site?</b>
<p><u>To the North</u></p> <ol style="list-style-type: none"> <li>1. Ungraded Park and Garden associated with Hoveton Hall dates from the early 19<sup>th</sup> Century. The southern edge of the Park and Garden is situated approximately 330 metres to the north of the site.</li> <li>2. Grade II Listed Greenhouse at Hoveton Hall is dated from the early 19<sup>th</sup> Century. The Listed building is situated approximately 1 km to the north of the site.</li> <li>3. Grade II Listed Stable Block at Hoveton Hall is dated from the early 19<sup>th</sup> Century. The listed building is situated approximately 1 km to the north of the site.</li> <li>4. Grade II Listed Hoveton Hall is dated from the early 19<sup>th</sup> Century. The listed building is situated approximately 940 metres to the north of the site.</li> <li>5. Grade II * Listed Church of St Peter is dated 1624. The listed building is situated approximately 430 metres to the north of the site.</li> <li>6. Grade II Listed Ice House in Ice Well Wood is dated circa 1800. The listed building is situated approximately 540 metres to the northeast of the site.</li> </ol> <p><u>To the South</u></p>

7. Grade II Listed Wroxham Railway Signal Box is dated 1900. The listed structure is situated approximately 600m to the southwest of the site.
8. Schedule Monument Wroxham Bridge was rebuilt in the early 17<sup>th</sup> Century, replacing an earlier structure. The bridge is situated approximately 1 km to the south of the site.
9. Article 4 Direction (Art4/00/009) – Related to the restriction of land use and not related to the historic environment.
10. Article 4 Direction (Broadland District) - not related to the historic environment.
11. Grade II Listed Church of St John dates from the 12<sup>th</sup> Century. The listed building is situated approximately 715 metres to the southeast of the site.

**If yes, what is the impact of the allocation on the significance of the designated heritage asset(s) (including any contribution made to that significance by its setting)**

To the North

1. Ungraded Park and Garden, Hoveton Hall

The ungraded park and garden associated with Hoveton Hall is set heavily tree lined and is situated approximately 330 metres to the north of the site, separated by arable land and the existing established field boundary along the northern boundary of the site and that which runs alongside the southern boundary of St Peter's Lane. The setting of the ungraded garden is rural in nature and this character would be preserved if this site were developed. It is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

2. Grade II Listed Greenhouse

The greenhouse is listed for its special significance as an early example of the use of rolled wrought iron for greenhouses and of additional interest as contemporary with Hoveton Hall. The listed building is situated approximately 1 km to the northeast of the site and it is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

3. Grade II Listed Stable Block

The stable block at Hoveton Hall is listed for its architectural significance. The listed building is situated approximately 1 km to the northeast of the site. It is therefore considered that because of the separation distance and intervening features, the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

4. Grade II Listed Hoveton Hall

Hoveton Hall is a Country House dated between 1809 and 1812. The Hall is listed for its architectural significance. The setting of the Hall is the grounds themselves, which are designated as an ungraded park and garden. The Hall itself is situated approximately 940 metres to the northeast of the site. It is therefore considered that because of the separation distance and intervening features, the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

5. Grade II \* Listed Church of St Peter

The Parish Church dated 1624. The church does not have a church tower and is situated outside of the settlement itself. Views of the church are possible from the north of the site, but views would be retained from the track to the north. Development of the site would bring residential buildings closer to the southwest of the church than currently exist, but there would be some 430 metres of separation between the development and the heritage asset, across an arable field. Given that there is existing residential development to the east of the site, directly to the south of the church, the impact of development at the site on the views to and from the church would be somewhat mitigated by the existing context. It is therefore considered that the development of the site for a residential use would have **some impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

6. Grade II Listed Ice House in Ice Well Wood

The listed building is dated approximately 1800 and is situated within Ice Well Wood. The listed building is situated approximately 540 metres to the north of the site. Given the distance of the listed building and its setting being the surrounding wood, it is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

To the South

7. Grade II Listed Wroxham Signal Box

The listed building dates from 1900 and its setting is directly related to the railway. The listed building is situated approximately 600 metres to the southwest of the site with a significant amount of existing development in-between. It is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

8. Wroxham Bridge

Wroxham Bridge is a Scheduled Monument and was rebuilt in the early 17<sup>th</sup> Century, replacing an earlier structure. The bridge is situated approximately 1 km to the south of the site. Although the site is distant from the scheduled monument and there is significant development in-between, the development of this site for residential development would have an impact upon the Scheduled Monument as the additional housing would result in additional traffic that would cross the bridge. It is therefore considered that the development of the site for a residential use would have **some impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

10. Article 4 Direction relates to the River Bure and the development of this site would not have an impact upon this Article 4 Direction.

11. Grade II Listed Church of St John

12<sup>th</sup> Century Parish church remodelled in the 15<sup>th</sup> Century with the west tower being built in 1765. The church was restored in 1890. The church is situated approximately 715m to the southeast of the site. There is a substantial amount of development between the church and the proposed site. It is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

<b>Non-designated heritage asset(s) on site?</b>
None

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Non-designated heritage asset(s) within the vicinity of the site?</b>
None

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Landscape Impact (including key views and topography)</b>
The topography of the site is largely flat. There are strong hedgerows along Tunstead Road and so the views are limited when entering Hoveton from Tunstead Road. Intermittent trees run alongside the northern boundary. There are views of the site from St Peter's Lane to the north.

<b>Prominent trees and other natural landscape features (both within and adjacent to the site)</b>
Strong hedgerow along Tunstead Road on the western boundary of the site. Trees line the boundary of the site to the north and the south.

### Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement

<b>Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.</b>
<p>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Wroxham Bridge and the Grade II * Listed Church of St. Peter. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> <li>• Retain and enhance landscaping on the northern and southern boundaries of the site</li> <li>• Retain strong landscaping on the western boundary of the site</li> <li>• Lower density, single storey dwellings on the northern part of the site</li> </ul>

<b>Enhancement: What are the potential opportunities for the enhancement of the historic environment?</b>
N/A

### Stage 4: Evaluating Impact

<b>Conclusions and Rag Rating</b>
<div style="background-color: #f4a460; width: 100px; height: 30px; display: inline-block;"></div> Retain site subject to policy requirements and updated development considerations.

## HV06/A: Land at Stalham Road

<b>Site Reference</b>	HV06/A
<b>Site Location</b>	Land at Stalham Road
<b>Buffer Zone</b>	500m

### Stage 1: Desktop Assessment

<b>Heritage Asset</b>	<b>Within site/ within 500m buffer/ beyond buffer</b>	<b>Name and Location</b> [heritage assets numbered in accordance with details on assessment map for HV06/A - Oct 2024]
<b>Listed Building</b>	<b>Within 500m buffer</b>  <b>Beyond buffer</b>	1. Grade II * Listed Church of St Peter 2. Grade II Listed Ice House, Ice Well Wood  4. Grade II Listed Hoveton Hall 5. Grade II Listed Stable Block at Hoveton Hall 6. Grade II Listed Greenhouse at Hoveton Hall 7. Grade II Listed Church of St John
<b>Conservation Area</b>	<b>None</b>	
<b>Scheduled Ancient Monument</b>	<b>None</b>	
<b>Historic Park and Garden</b>	<b>Part within the 500m buffer</b>	3. Ungraded Hoveton Hall Park and Garden
<b>Locally Listed Building</b>	<b>None</b>	

### Stage 2: Site Survey

<b>Site Description (Including form and character, materials, massing and scale)</b>
The site is part of a large agricultural field located at the northern end of Hoveton. It is situated alongside the northeastern boundary of recent residential development, near a mini roundabout. The southeastern boundary features mature hedgerow interspersed with trees, running adjacent to the A1151 Stalham Road. On the opposite side of this road, there is residential development fronting the road, with additional housing extending further back, creating a deeper residential area. Further residential properties line the road in a linear fashion to the northeast, ending at St. Peter's Lane. The northwest boundary of the site includes an established field boundary that transitions into open field, which continues along the northeastern boundary until it meets the existing residential properties.

<b>Designated heritage asset(s) on site ?</b>
None.

<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
N/A

<b>Designated heritage asset(s) within the vicinity of the site?</b>
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### To the North

1. Grade II \* Listed Church of St Peter is dated 1624. The listed building is situated approximately 340 metres to the north of the site.
2. Grade II Listed Ice House in Ice Well Wood is dated circa 1800. The listed building is situated approximately 390 metres to the north of the site.
3. Ungraded Park and Garden associated with Hoveton Hall dates from the early 19th Century. The Park and Garden is situated approximately 400m to the north of the site.
4. Grade II Listed Hoveton Hall is dated from the early 19th Century. The listed building is situated approximately 840 metres to the north of the site.
5. Grade II Listed Stable Block at Hoveton Hall is dated from the early 19th Century. The listed building is situated approximately 880 metres to the north of the site.
6. Grade II Listed Greenhouse at Hoveton Hall is dated from the early 19th Century. The Listed building is situated over 960 metres to the north of the site.

### To the South

7. Grade II Listed Church of St John dates from the 12th Century. The listed building is situated over 890 metres to the southwest of the site.

### **If yes, what is the impact of the allocation on the significance of the designated heritage asset(s) (including any contribution made to that significance by its setting)**

#### **Within 500m buffer**

#### **1. Grade II\* Listed Church of St Peter**

The Grade II\* Parish Church of St Peter, dated 1624, is situated outside of the settlement and does not have a church tower. Views of the church are possible from parts of the site. Development of the site would bring residential buildings closer to the direct south of the church than currently exist, but there would be some 340 metres of separation between the development and the heritage asset, across an arable field. Given the existing residential development to the northeast and south of the site, which is directly to the south and southeast of the church, the impact of development at the site on the views from the church would be somewhat mitigated by the existing context. Therefore, it is considered that the development of the site for residential use would have **some impact** on the significance of the heritage asset, including any contribution made to that significance by its setting.

#### **2. Grade II Listed Ice House in Ice Well Wood**

The listed building is dated approximately 1800 and is situated within Ice Well Wood. The listed building is situated approximately 390 metres to the north of the site. Given the distance of the listed building and its setting being the surrounding wood, it is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

#### **3. Ungraded Park and Garden, Hoveton Hall**

The ungraded park and garden associated with Hoveton Hall is set heavily tree lined and is situated approximately 400 metres to the north of the site, separated by arable land and the existing established field boundary which runs alongside the southern boundary of St Peter's Lane. The setting of the ungraded garden is rural in nature and this character would be preserved if this site were developed. It is therefore considered that the development of the site for a residential use would have **no**



**impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

**Beyond 500m buffer**

**4. Grade II Listed Hoveton Hall**

Hoveton Hall is a Country House dated between 1809 and 1812. The Hall is listed for its architectural significance. The setting of the Hall is the grounds themselves, which are designated as an ungraded park and garden. The Hall itself is situated approximately 840 metres to the north of the site. It is therefore considered that because of the separation distance and intervening features, the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

**5. Grade II Listed Stable Block**

The stable block dates from the early 19<sup>th</sup> Century and is listed for its architectural significance. The listed building is situated some 880 metres to the north of the site. It is therefore considered that because of the separation distance and intervening features, the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

**6. Grade II Listed Greenhouse**

The listed building is dated approximately 1800 and is situated within Ice Well Wood. The listed building is situated approximately 960 metres to the north of the site. Given the distance of the listed building and its setting being the surrounding wood, it is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

**7. Grade II Listed Church of St John**

12<sup>th</sup> Century Parish church was remodelled in the 15<sup>th</sup> Century with the west tower being built in 1765. The church was restored in 1890. The church is situated over 890 metres to the southwest of the site. There is a substantial amount of development and other intervening features between the church and the proposed site. It is therefore considered that the development of the site for a residential use would have **no impact** upon the significance (including any contribution made to that significance by setting) of the heritage asset.

**Non-designated heritage asset(s) on site?**

None.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

N/A

**Non-designated heritage asset(s) within the vicinity of the site?**

None.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

N/A

**Landscape Impact (including key views and topography)**

The topography of the site is largely flat, as is the wider landscape and is bounded by residential development to the east, south and northeast. There is no existing field boundary for part of the northwest boundary or for much of the northern boundary, therefore, a soft edge would need to be established to off-set the site's impact on wider views particularly from St Peter's Lane to the north.

**Prominent trees and other natural landscape features (both within and adjacent to the site)**

There is an existing mature field hedgerow, interspersed with some trees, along the site's frontage to Stalham Road and which also bounds the southern side of the existing row of dwellings to the northeast of the site.

**Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement**

**Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.**

Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including the Grade II Listed Church of St Peter. Development should include the following mitigation measures,

- Retain and enhance, where possible, landscaping alongside the Stalham Road and adjacent No. 61 Stalham Road
- Provide strong landscaping to the western and northern boundaries of the site
- Lower density, single storey dwellings on the northern part of the site

**Enhancement: What are the potential opportunities for the enhancement of the historic environment?**

N/A

**Stage 4: Evaluating Impact**

**Conclusions and Rag Rating**

Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 3.

**BLA01/B: Land south of Morston Road**

<b>Site Reference</b>	BLA01/B
<b>Site Location</b>	Land South of Morston Road
<b>Buffer Zone</b>	500m

**Stage 1: Desktop Assessment**

Heritage Asset	Within site/ within 500m buffer/ beyond buffer	Name and Location
Listed Building	within 500m buffer	3. Grade II* Listed Building, Red House, 9 The Quay 5. Grade II Listed Building , Quay Barn and wall fronting road adjoining north-east corner of Quay Barn 6. Grade II Listed Building, Kings Arms Inn, Westgate Street 7. Grade II Listed Building, 6 Westgate Street 8. Grade II Listed Building, Shipley House inc. garden wall, Westgate Street 9. Grade II Listed Building, 10 Westgate Street 10. Grade II Listed Building, Westview, 18 Westgate Street 11. Grade II Listed Building, The Pightle, Westgate Street 12. Grade II Listed Building, Pimpernel Cottage, 16 Westgate Street 13. Grade II Listed Building, 20 Westgate Street 14. Grade II Listed Building, 11-15 Westgate Street 15. Grade II Listed Building, 19 Westgate Street 16. Grade II Listed Building, 23 Westgate Street
	beyond buffer	19. Grade II Listed Building, Barn north-west of No 6 (Old Rectory), Wiveton Road 20. Grade II* Listed Building, The Old Rectory, 6 Wiveton Road 23. Grade I Listed Building, Parish Church of All Saints, The Street
Conservation Area (CA)	within 500m buffer	17. Glaven Valley CA 18. Blakeney CA
	beyond buffer	22. Morston CA
Scheduled Monument	Within 500m buffer	1. Two bowl barrows on Blakeney Downs
Historic Park and Garden	None	
Locally Listed Building	Within 500m buffer	2. Locally listed, North Granary, 9 The Quay 4. Locally listed, South Granary, 9 The Quay

## Stage 2: Site Survey

Site Description (Including form and character, materials, massing and scale)
<p>The site is located on the south-west side of Blakeney on the south side of Morston Road, where the majority of the land sits behind existing dwellings. It is currently arable land with mature hedgerow / trees to some of its boundaries. Existing residential properties bound the site to the northern, eastern and part of the western boundaries. Part of the latter is also characterised by Kettle Hill, which forms part of Blakeney Downs. The dwellings to the north of the site are two storey (facing onto Morston Road), whilst the dwellings to the eastern boundary are set down from the site and are a mixture of single or two storey in height (Harbour Way, Hayward Close,</p>

Queens Close,). A contemporary flat roofed two storey building, known as Bliss, is located immediately to the northwest of the site.

The village of Blakeney is located on the North Norfolk coast with an historic quayside and which is situated within the Norfolk Coast National Landscape (NCNL). The village benefits from the attractive coast, beautiful surrounding countryside. There are a total of 101 Listed Buildings in Blakeney, one of the most important being one Grade I (Church of St Nicholas – situated beyond the extent of the HIA map but some 1 km eastward from the site) and five Grade II\*. In addition, there are two Scheduled Monuments. One of these relates to two bowl barrows on Blakeney Downs, which is part of a wider SSSI, in close proximity to the west of the site.

The village is set on a gentle slope, which rises southwards from the marshes to the area of Howe Hill, on which the church is situated. At the heart of the village, the land slopes gradually downwards from New Road as it approaches the Quay to the north. From here, long range views are afforded across the flat salt marshes beyond. At the west of the village, along Morston Road, the land rises as it leaves the village, towards the apex at Kettle Hill, and then falls away towards Morston.

The agricultural setting to the south and bank of tree planting along the southern and eastern edges of the village are important, the latter creating a green backdrop to the village as seen from the marshes.

<b>Designated heritage asset(s) on site?</b>
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No.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Designated heritage asset(s) within the vicinity of the site?</b>
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<u>DISTANCES HAVE BEEN UPDATED 31/10/24</u> <u>Within 500 metre buffer</u>
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- |   |
|---|
| <ol style="list-style-type: none"><li>1. Two bowl barrows on Blakeney Downs, Scheduled Monument, the most numerous form of round barrow, are funerary monuments dating from the Late Neolithic period to the Late Bronze Age, situated approximately 230 metres to the east of the site. The barrows fall within a larger Archaeological Site, which extends to the north, south and west.</li><li>3. Red House, 9 The Quay, Grade II* Listed, late C18 but possible earlier origin, re steep pitch of roof. Long and low red brick house situated over 480 metres to the north-east of the site.</li><li>5. Quay Barn and wall fronting road adjoining north-east corner of Quay Barn, Grade II Listed, C17/18. Probably originally a barn, but now a dwelling, located 500 metres to the north-east of the site.</li><li>6., Kings Arms Inn, Westgate Street, Grade II Listed, C18. At right angles to road, situated over 430 metres to the north-east of the site.</li><li>7. 6 Westgate Street, Grade II Listed, early C19 at right angles to road, located approximately 440 metres to the north-east of the site.</li><li>8. Shipley House including garden wall, Westgate Street, Grade II Listed, C18 house located approximately 430 metres, as the crow flies, to the north-east of the site.</li><li>9. 10 Westgate Street, Grade II Listed, Circa 1840, at right angles to road. Formerly two cottages, situated approximately 420 metres to the north-east of the site.</li></ol> |
|---|

10. Westview, 18 Westgate Street, is an early C19 house Grade II Listed, located approximately 400 metres to the north-east of the site.
11. The Pightle, Westgate Street, Grade II Listed, C18 cottage, located approximately 440 metres to the north-east of the site.
12. Pimpernel Cottage, 16 Westgate Street, Grade II Listed, Datestone 1839, pair of cottages at right angles to road situated approximately 420 metres to the north-east of the site.
13. 20 Westgate Street, Grade II Listed, Mid C19, located approximately 420 metres to the north-east of the site.
14. 11-15 Westgate Street, Grade II Listed, early/mid C19 terrace of cottages located over 440 metres to the north-east of the site.
15. 19 Westgate Street, Grade II Listed, situated approximately 450 metres to the north-east of the site.
16. 23 Westgate Street, Grade II Listed, early C19. Former row of cottages at right angles to road, now one, located over 420 metres to the north-east of the site.
17. Glaven Valley CA, where its closest edge is over 390 metres to the north-east of the site.
18. Blakeney CA, where its closest edge is over 390 metres to the north-east of the site. The CA is concentrated on the historic core of the village to the northeast of the A149.

#### Beyond 500 metre buffer

19. Barn northwest of No 6 (Old Rectory), Wiveton Road, Grade II Listed, C17/18 large flint barn with red brick dressings, located over 760 metres to the southeast of the site.
20. The Old Rectory, 6 Wiveton Road, Grade II\* Listed, C16/17. Flint and brick, partly pebble-dashed, situated over 820 metres to the southeast of the site.
21. Article 4 Direction, over 970 metres east of the site.
22. Morston CA, where its closest point is over 1.2 km to the west of the site.
23. Parish Church of All Saints, The Street, Grade I Listed. Fabric dating from C12, but mainly C13. Walls flint, stone dressings with a west tower, located approximately 1.25 km to the west of the site.

#### **If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

##### **Within 500 metre buffer**

##### To the west

1. Two bowl barrows on Blakeney Downs, Scheduled Monument is located to the west of the site. The Scheduled Monument is screened from the site by Kettle Hill and with there being some intervening properties, there is little direct impact on the significance of the heritage asset, but there would be **some impact**, albeit modest, on their setting within Blakeney Downs and Kettle Hill, as development on the site would be immediately adjacent to this SSSI.

##### To the northeast

Heritage Assets No's 3, 5-16 (inclusive) relates to a cluster of listed buildings situated within the westernmost part of the Blakeney CA that are located at least 400 metres to the northeast of the site. Although the land gently rises up from these buildings to the site, there are many existing C20<sup>th</sup> intervening dwellings/ buildings and landscaping, which prevent direct views. As such, the residential development of the site would have **no impact** upon the significance of these heritage assets, including any contribution made to the significance by their settings.

17. Glaven Valley CA; The significance of the Glaven Valley CA lies in the way people have used the River Glaven and the landscape it has shaped for milling, agriculture,

trade and leisure. Given that the closest edge of the CA is approximately 390 metres away from the site, as well as the existing buildings and landscaping to the northeast of the site, the residential development of the site would have **no impact** upon the significance of the special qualities of this wide-reaching Conservation Area.

18. Blakeney CA ; The CA covers the central core of the village of Blakeney, including the High Street, the Quay and Westgate Street, as well as encompassing areas more recently developed to the south along New Road, and to the west, along Back Lane. To the north, part of the salt marsh is included in the boundary and to the west the former Carmelite Friary site, now Friary Farm, and the caravan site are included. Blakeney CA Appraisal (July 2019) states that; 'Blakeney is one of the Glaven ports, which owe their existence to their proximity to the sea and the River Glaven.' It 'was an important port on the North Norfolk coast, which served import and export trade for hundreds of years. The village's function as a port has shaped its pattern of development and the buildings within it, with the Quay to the north being the industrial hub where former warehouses and granaries are located, intimate historic streets leading south with former worker's and fishermen's cottages, and the Church located to the south on a rise where it could be visible as a beacon from the sea.' The Appraisal comments that 'the setting of the village is of significance to its character, with the open, flat salt marshes interspersed with channels and creeks, set below the broad Norfolk skies, which are dramatic both by day and night. Views into and out of the CA to the north are especially important to preserve.'

The Blakeney CA is located to the northeast of the site, where its closest point is approximately 390 metres away. The site itself is raised up from existing development to its southeast and east by approximately 1 – 1.5 metres, but there is a significant amount of C20<sup>th</sup> development and existing landscaping between the site and the CA. Given that the site is located on the east side of Kettle Hill and Blakeney Downs, longer distance views looking from the west/ southwest may be modestly affected when looking towards the CA. However, the residential development of the site would have **no impact** upon the significance of the special qualities of the Blakeney CA.

#### Beyond 500 metre buffer

##### To the East

Heritage Assets No's 19 and 20 are located over 760 metres from the site. Given the distances and numerous intervening buildings and landscaping between the site and these heritage assets, there would be **no impact** upon the significance of these listed buildings, including any contribution made to the significance by their settings, as a result of the residential development of the site.

##### To the West

No. 22. Morston CA and No. 23. Parish Church of All Saints, The Street, Morston are both situated over 1.2 km from the site. Given the distances and numerous intervening settlement buildings between the site and these heritage assets, there would be **no impact** upon the significance of these heritage assets, including any contribution made to that significance by their settings, as a result of the residential development of the site.

**Non-designated heritage asset(s) on site?**

No.
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<b>If yes, what is the impact on designated heritage asset(s) in terms of significance and setting</b>
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N/A
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<b>Non-designated heritage asset(s) within the vicinity of the site?</b>
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<u>Within 500 metre buffer</u>
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2. North Granary, 9 The Quay, locally listed, located approximately 500 metres to the north-east of the site.
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4. South Granary, 9 The Quay, locally listed, situated approximately 460 metres to the north-east of the site.
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<b>If yes, what is the impact on non-designated heritage asset(s) in terms of significance and setting</b>
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<u>To the Northeast</u>
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Non-designated assets No's 2 and 4 are located at least 460 metres to the northeast of the site. Given the distances and numerous intervening buildings between the site and these locally listed buildings, there would be <b>no impact</b> upon the significance of these non-designated buildings, including any contribution made to that significance by their settings, as a result of the residential development of the site.
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<b>Landscape Impact (including key views and topography)</b>
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The key views of Blakeney would be from the Morston Road to the west and from Langham Road to the southwest of the village. There is only a relatively narrow strip of land that extends directly to the Morston Road, with a further strip of land running along the southwest boundary of Harbour Way, to join Langham Road. The majority of the site is set back from the road and with Kettle Hill to the west of the site, residential development would only be visible from a shorter distance from the west. The view from Langham Road looking northwest provides magnificent views of Blakeney Marshes and Blakeney Downs/ Kettle Hill.
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The topography of the site rises up from the southeastern corner towards Kettle Hill and also slopes gently down towards Morston Road and the northeast part of the site. The site level is approximately 1 – 1.5 metres higher than the neighbouring dwellings to the east, at Harbour Way, Hayward Close and Queens Close. It is noted that many of these properties are single or one and a half storeys high. With the lower ground levels, it is noted that only their roofs are visible in the views from the Langham Road.
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Any residential development set at the site's current ground levels, is likely to cause significant harm to the views of Blakeney Marshes, which can currently be seen over the rooftops of the existing dwellings. In addition, any residential development would see the encroachment of dwellings closer to Blakeney Downs/ Kettle Hill, where there is currently a natural break.
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<b>Prominent trees and other natural landscape features (both within and adjacent to the site)</b>
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There are hedgerows/ landscaping along most of the northern boundary and southwestern boundaries and significant landscaping on the adjacent land to the southwest, associated with Kettle Hill.
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### Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement

**Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.**

Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, the two bowl barrows on Blakeney Downs, a Scheduled Monument.

Development should include the following mitigation measures:

- Development proposals must be designed and landscaped to minimise visual impact on the two bowl barrows. Planning applications would need to be supported by a heritage statement with visualisations.
- Respect and reflect the massing and heights of surrounding dwellings. The site is approximately 1 – 1.5 metres higher than the dwellings to the east. Given this, the height of any potential residential development should be comparatively similar to the height from the ground level of the two storey dwellings to the east of the site, to ensure that any new development sits within the landscape, which is important given the site falls within the Norfolk Coast National Landscape.
- As stated within the Landscape Impact section above, any residential development set at the site's current ground levels, is likely to cause significant harm to the views of Blakeney Marshes, which can currently be seen over the rooftops of the existing dwellings. In addition, any residential development would see the encroachment of dwellings closer to Blakeney Downs/ Kettle Hill, where there is currently a significant natural break. As such, the landscaping to the western boundary should be retained and significantly strengthened.
- Along with careful consideration of the scale and layout of this relatively large site (for the size of Blakeney), provision of substantial landscaping and open space within the development would be required.

**Enhancement: What are the potential opportunities for the enhancement of the historic environment?**

The layout and scale of any residential development on the western edge with Kettle Hill and Blakeney Downs, in association with the Scheduled Monument (1. The two Bowl Barrows), will require careful consideration, because of its proximity to the site. The retention and strengthening of existing hedgerows/ landscaping to the northern and western boundaries and the introduction of hedgerows/ landscaping to the eastern boundary would help soften the overall appearance of a development and mitigate any localised impact, being an edge of settlement site.

**Stage 4: Evaluating Impact**

**Conclusions and Rag Rating**

	Retain site subject to policy requirements and updated development considerations.
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**BRI02/C: Land West of Astley Primary School**

<b>Site Reference</b>	BRI02/C
<b>Site Location</b>	Land West of Astley Primary School
<b>Buffer Zone</b>	500m



## Stage 1: Desktop Assessment

Heritage Asset	Within site/ within 500m buffer/ beyond buffer	Name and Location
<b>Listed Building (LB)</b>	<b>1. &amp; 4. are within 500m buffer zone</b>  <b>2., 3., and 5. – 8. are beyond buffer</b>	<p>11. Grade II listed building, Manor Farmhouse, Fakenham Road</p> <p>12. Grade II listed building, Old Nursery Farmhouse, Fakenham Road</p> <p>13. Grade II listed building, Home Farmhouse, Church Street</p> <p>14. Grade II listed building, Methodist Chapel, The Lane</p> <p>15. Grade II listed, Congregational Chapel &amp; Railings, 3 The Lane</p> <p>16. Grade II* listed building, Church of All Saints, Church Street</p> <p>17. Grade II listed, Briston War Memorial, All Saints Churchyard, Church Street</p> <p>18. Grade II listed building, Church House, Church Street</p> <p>(Not numbered) Grade II listed buildings, Burgh Hall Farmhouse, Holt Road, Melton Constable; and Burgh Hall Farm Barn, Holt Road, Melton Constable</p>
<b>Conservation Area (CA)</b>	<b>9. is beyond buffer</b> <b>10. is within buffer zone</b>	<p>9. Glaven Valley Conservation Area</p> <p>10. Melton Constable Conservation Area</p>
<b>Scheduled Ancient Monument</b>	<b>None</b>	
<b>Historic Park and Garden</b>	<b>Beyond buffer</b>	Not shown on map. Melton Constable Hall Park and Garden Grade II* is situated over 1500m to the southwest of the site.
<b>Locally Listed Building</b>	<b>Beyond buffer</b>	There are 5 locally listed buildings within the neighbouring village of Melton Constable the closest being over 690m to the west of the site.

## Stage 2: Site Survey

<b>Site Description (Including form and character, materials, massing and scale)</b>
<p>The site is predominantly an 'L' shaped arable field located on the south side of the Fakenham Road (B1354), on the north-western edge of the village of Briston and falls within the settlement boundary of Melton Constable on its easternmost edge. The site is located immediately to the west and south of Astley Primary School, with a narrower section of land extending across the southern boundary of Woodfield. Part of the southern boundary of the site would extend across the existing field boundary into the next field. The site is bounded by an existing bungalow development at Hillside and a two-storey house fronting the Fakenham Road on its western side and arable fields to the south and north, on the opposite side of the Fakenham Road. The boundaries of the site are marked by hedgerows on the east, west and north sides, with a number</p>

of trees close to the eastern boundary. The southern section of the site is intersected by an existing field boundary which is marked by hedgerow and some trees.

The site visit reveals that one of the defining characters of the Norwich Road, from the site towards Melton Constable, is the existing hedgerows that form boundaries to the existing arable fields on both the north and south side of the road (the latter being more intermittent due to existing housing development).

**Designated heritage asset(s) on site?**

None.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

N/A

**Designated heritage asset(s) within the vicinity of the site?**

Within 500 metre buffer

1. Manor Farmhouse, Fakenham Road is a Grade II listed building c.1700 and is the closest heritage asset to the site, being located over 350 metres to the east, on the north side of Fakenham Road (B1354).
4. The Methodist Chapel, The Lane is a Grade II listed building C18 and is located approximately 480 metres to the east of the site.
10. Melton Constable Conservation Area is located to the west of the site, where its closest point is approximately 340 metres to the site.

Beyond 500 metre buffer

2. Old Nursery Farmhouse, Fakenham Road is a Grade II listed farmhouse C17 and early C18, which is located over 560 metres to the northeast of the southeastern extent of the site, on the northern side of the Fakenham Road.
3. Home Farmhouse on Church Street is a Grade II listed building C17 and is situated approximately 740 metres to the east of the northern area of the site and some 545 metres to the northeast of the southeastern extent of the site.
5. Congregational Chapel & Railings are Grade II listed. The Chapel is dated 1775 and is located some 550 metres to the east of the southeastern extent of the site.
6. Church of All Saints, Church Street is a Grade II\* parish church c.1300 with early C19 roofs and bell cote, located approximately 760 metres, to the southeast of the southeastern extent of the site.
7. Briston War Memorial, All Saints Churchyard, Church Street Grade II listed, circa. 1920 with Second World War additions is located approximately 790 metres to the southeast of the southeastern extent of the site.
8. Church House, Church Street is a Grade II listed building, which is located some 930 metres to the southeast of the southeastern extent of the site.
9. Glaven Valley Conservation Area- its nearest point is over 1.1 kilometres to the northeast of the site.

**If yes, what is the impact of the allocation on the significance of the designated heritage asset(s) (including any contribution made to that significance by its setting)**

**Within 500m buffer:**

To the east

1. Manor Farmhouse is listed for its special architectural or historic interest. It has whitewashed plaster render, black glazed pantile roof and is a two-storey double pile house. The southern double gabled end of the Grade II listed Manor farmhouse is positioned adjacent to the Fakenham Road, with just a footpath separating the building from the highway. The farmhouse forms part of an agricultural holding, where there are a number of associated single storey traditional agricultural buildings located adjacent to it. The holding has a flint and stone wall that runs alongside the Fakenham Road. The farmhouse also appears to have a garden situated to the west of the building.

Looking at the Tithe and First Edition Ordnance Survey maps it is not clear whether the site BRI01 formed part of the historic holding of Manor Farm. The 1948 aerial map suggests that, at this time, there may have been a separate farm holding on the south side of the Fakenham Road (immediately adjacent to the west side of the site).

The farmhouse is visible from a considerable distance, particularly when looking along the Fakenham Road from the east. The listed building is likely to be visible from the northernmost part of the site, but at a considerable distance. It is also noted that there are existing c20 dwellings situated closer to the listed building on the southern side of Fakenham Road, including those immediately opposite. The longer distance views of the farmhouse, when travelling towards Briston from the west, would not be curtailed by the potential residential development of the site.

The principal elevation of the farmhouse faces east, which is in the opposite direction to the site and although the potential residential development of the site would reinforce the cumulative perception of enclosure, in regard to the setting of the farmhouse when looking southwest from it, the impact is likely to amount to **some impact** to the significance of the building, including any contribution made to that significance by its setting.

It is noted that a teardrop shaped area of land immediately to the northeast of the farm buildings is an area of archaeological interest. The listed farmhouse is located between the site and the archaeological area and also given the distance; any potential residential development would have **no impact** on the significance of this asset.

4. The Methodist Chapel is listed for its special architectural or historic interest. It is late C18 brick with black glazed pantile hipped roof. Converted into a dwelling in the 1970's. It is surrounded by residential development some 480 metres to the east of the site. Given the distance and numerous intervening buildings between the site and the listed building, the potential residential development of the site would have **no impact** upon the significance (including any contribution made to that significance by its setting) of this heritage asset.

#### To the west

10. Melton Constable Conservation Area (MCCA): The closest part of the MCCA is approximately 340 metres to the west and relates to the reasonably self-contained historic core of the village. The Conservation Area Appraisal for Melton Constable states the following about its special character:

*In the context of North Norfolk, Melton Constable is a unique village. Initially it developed during a period of rapid economic and social growth in the late 1880's. The village and its infrastructure became a key junction in the North Norfolk railway system. The built fabric, with the specifically designed artisan railway dwelling houses*

*and the various community buildings such as the school and the former railway institute, intrinsically reflects this period.*

There are existing C20 residential dwellings situated on the edge of the settlement of Melton Constable, between the MCCA and the site, which would prevent any direct views. Given the distance, sloping topography and intervening buildings, residential development of the site would have **no impact** upon the significance of the special qualities of the MCCA.

It is also noted that there is a 50 metre wide trench of land to the southwest of the site, a minimum of 200 metres from the site, which is of archaeological interest and a large part of the village of Melton Constable also falls within an area of archaeological interest approximately 500 metres to the west. Given the distances between both areas and the site, any potential development would have **no impact** upon their significance.

**Beyond 500m buffer:**

To the east and southeast

Each of the Heritage Assets numbered 2., 3., and 5. to 8. are situated over 500 metres from the site, where there are many intervening properties between the site and the listed buildings. It is noted that there are not any long-distance views of the Grade II\* parish church (which does not have a tower) from the site. Given the distances, sloping topography and numerous intervening buildings between the site and the listed buildings, the potential residential development of the site would have **no impact** upon the significance (including any contribution made to that significance by their settings) of these heritage assets.

Melton Constable Hall Park and Garden is situated over 1500m to the southeast of the site. It is noted that both Melton Constable Park and Garden and Melton Constable Hall are listed separately on the Heritage at Risk Register.

Given the significant intervening distance between the site and Melton Constable Hall Park and Garden, and given the context of the existing residential development immediately to the west of part of the site, Astley Primary School and Woodfield residential estate to the west and north of the site, residential development of the site would not likely be obvious in any long-distance views to or from Melton Constable Hall Park and Garden. As such, residential development of the site would have **no impact** upon its significance, including any contribution made to that significance by its setting

To the northeast

9. The closest part of the Glaven Valley Conservation Area is over 1.1km to the northeast of the site. Given the significant distance, existing built forms to the east, south and west of the site and intervening landscaping, any potential residential development of the site would have **no impact** upon the significance of the special qualities of this wide-reaching Conservation Area.

To the west of the site

The two Grade II listed buildings (not numbered on the plan) known as Burgh Hall Farmhouse and Burgh Hall Farm Barn at Holt Road, Melton Constable are located within the neighbouring village of Melton Constable, the closest being more than 750 metres to the northwest of the site. There are numerous existing C20 properties situated on the edge of the settlement of Melton Constable, between the buildings and the site, which, along with the distance, landscaping and sloping topography,

means that the potential residential development of the site would have **no impact** upon the significance of these listed buildings, including any contribution made to their significance by their settings.

**Non-designated heritage asset(s) on site?**

None.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

N/A

**Non-designated heritage asset(s) within the vicinity of the site?**

None with 500 metre buffer, but see below.

**If yes, what is the impact on designated heritage asset(s) in terms of significance and setting**

**Beyond 500m buffer**

To the west

Five locally listed buildings within neighbouring settlement of Melton Constable. The closest one being more than 650 metres to the west of the site. There are numerous existing C20 properties situated on the edge of the settlement of Melton Constable, between these buildings and the site, which along with the distance and sloping topography, means that the potential residential development of the site would have **no impact** upon the significance of any of these locally listed buildings, including any contribution made to their significance by their settings.

**Landscape Impact (including key views and topography)**

The topography of the site slopes down fairly gently from south to north. It does not appear to be particularly elevated from the Fakenham Road on its northern boundary. There may be very limited intermittent longer distance views of the site from Brinton Road to the northeast.

It is noted that the Regulation 18 consultation response from Historic England acknowledged that whilst there are no designated heritage assets on the site, its development would (along with BRI01) remove an important gap and physical separation between the villages of Melton Constable and Briston. Historic England asserts that coalescence of settlements should be avoided as it is considered important to maintain the character and distinctiveness of individual settlements.

Looking solely at residential development on this site, it is considered that the landscape impact could be potentially significant, given that its size would provide a bigger volume of development, which would inevitably physically connect the two settlements. As such, it is acknowledged that the development of both the housing sites BRI01 and BRI02/C would be contrary to the aims of Policy EN2 of the current Local Plan. This Policy states that, development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance, amongst a number of matters, gaps between settlements, and their landscape setting and the special qualities and local distinctiveness of the area (including its historical,

biodiversity and cultural character). Going forward, emerging Policy ENV2, is supportive of development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design and landscaping, amongst other matters. It also requires consideration to be given to both the individual and cumulative impacts of a proposal and specifically refers to the need for development proposals to demonstrate that distinctive settlement character is protected, conserved and enhanced.

**Prominent trees and other natural landscape features (both within and adjacent to the site)**

The site comprises largely of arable fields bounded by mature hedgerows. Part of the southern boundary of the site would extend beyond the existing field boundary into the next field. This boundary is marked by mature hedgerow and some trees.

**Stage 3: Avoiding Harm (Mitigation Measures) and opportunities for enhancement**

**Avoiding Harm : Consideration of type of development/design/layout/site boundary/landscaping/open space/heights of buildings etc.**

Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, Manor Farmhouse, a grade II listed building. Development should include the following mitigation measures:

- Provide additional landscaping and enhance the existing landscaping along the eastern boundary to ensure a clear physical separation between the two settlements is maintained
- Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys
- Existing hedgerows / landscaping to be retained and enhanced along the western and northern boundaries
- Existing hedgerows / landscaping to be retained and enhanced, where possible, where the existing field boundary intersects the southern section of the site
- Open space should be located on the eastern boundary to further maintain a gap between the settlements
- There is potential that heritage assets with archaeological interest (buried archaeological remains) may be present at the site and that their significance will be affected by the proposed development of the site. An Archaeological Evaluation would be required, which should include a geophysical survey. A brief is available from Norfolk County Council Historic Environment Service.

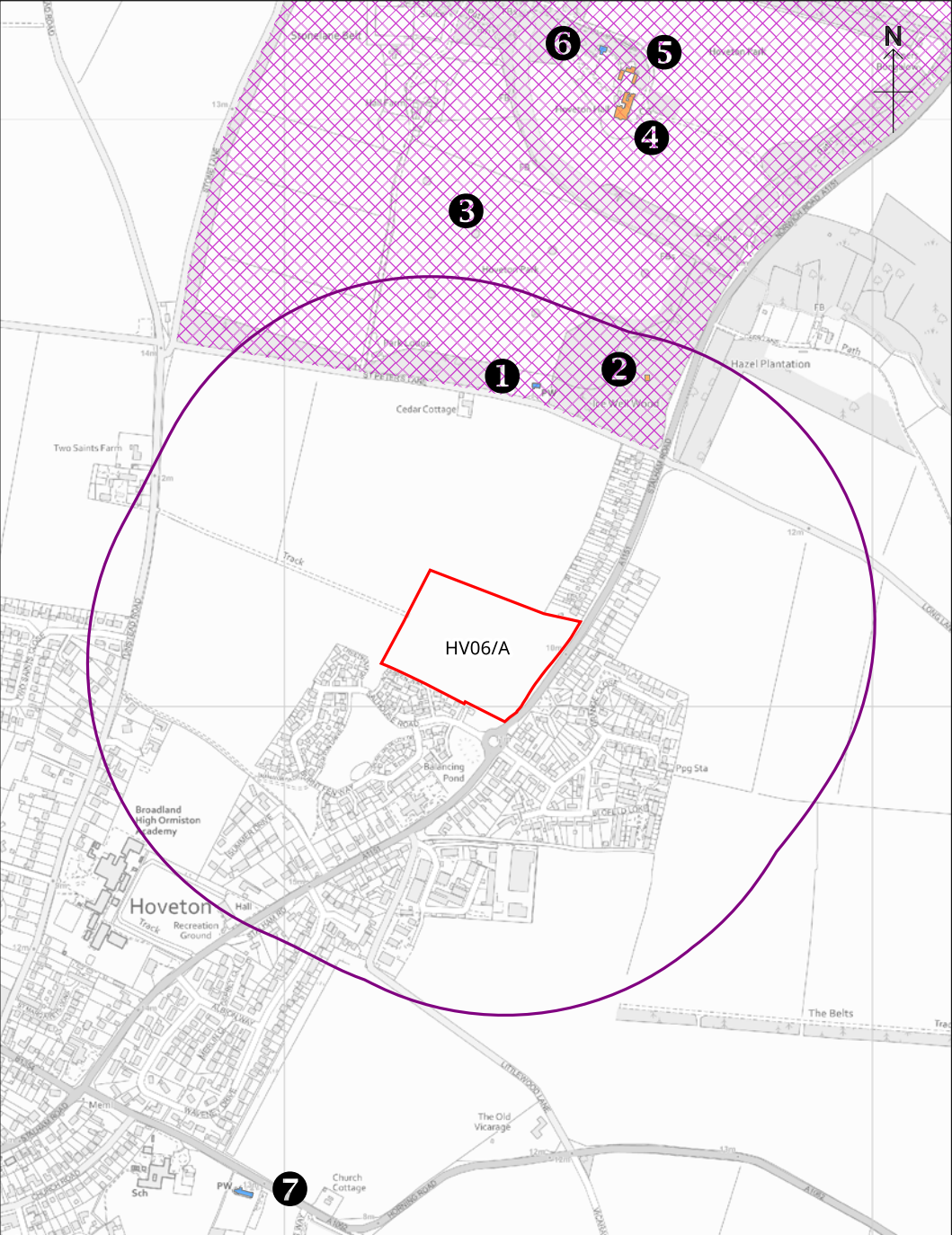
**Enhancement: What are the potential opportunities for the enhancement of the historic environment?**

None specifically in relation to the historic environment, particularly given the very modest impact that the potential residential development of the site is likely to have on the significance of the nearest heritage assets of Manor Farmhouse and Melton Constable Conservation Area. However, it is considered that the landscaping/ biodiversity measures recommended above could enhance the overall character of the area.

**Stage 4: Evaluating Impact**

**Conclusions and Rag Rating**

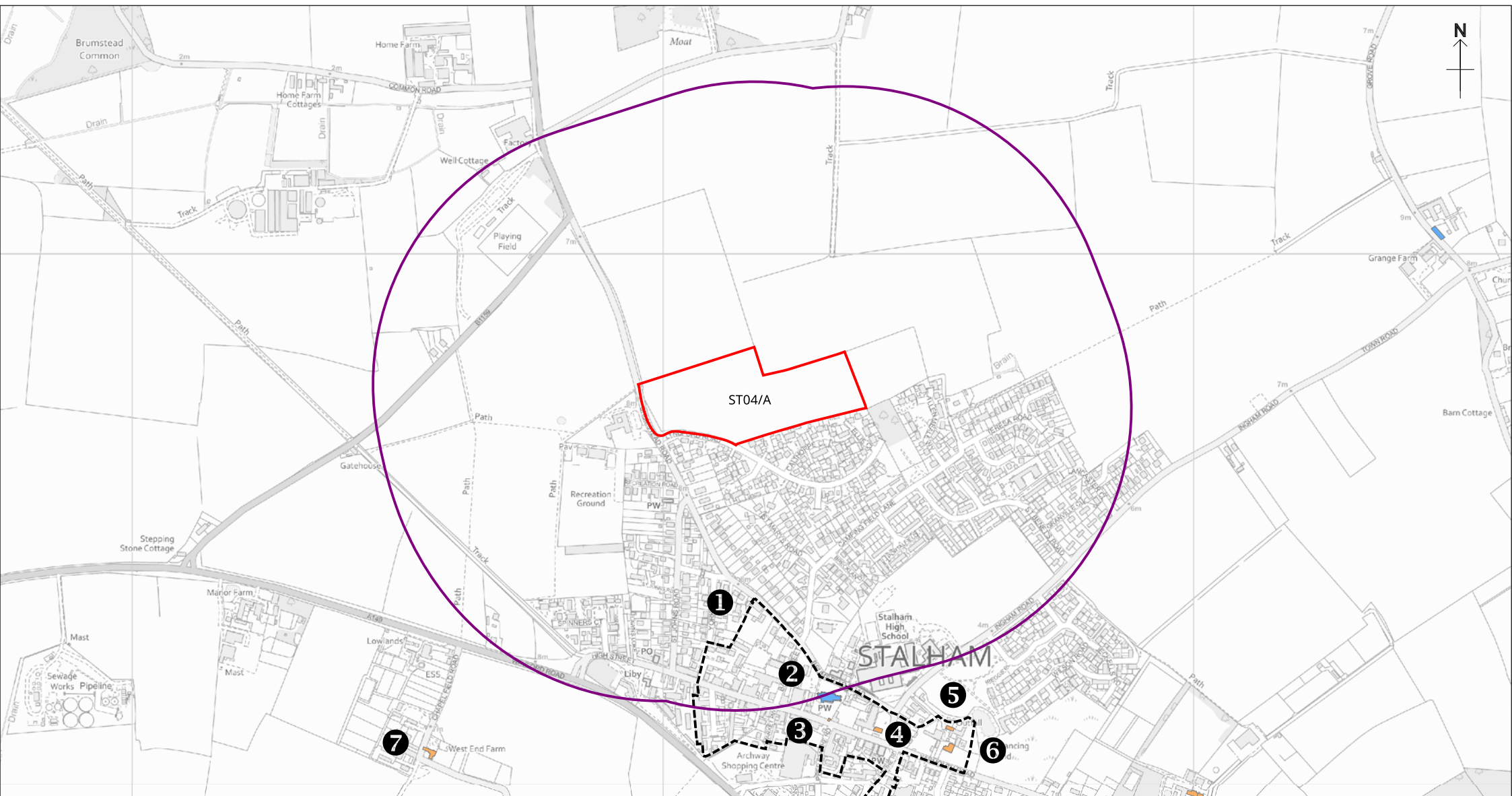
	Limited impact on the historic environment, development proposals should have regard to the policy requirements within Stage 3.
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## Heritage Impact Assessment

- |                                  |                               |                          |
|----------------------------------|-------------------------------|--------------------------|
| Assessment Site                  | Conservation Area             | Listed Building I        |
| 500m Search Radius               | Historic Park/Garden I        | Listed Building II       |
| Archaeological Notification Area | Historic Park/Garden II       | Listed Building II*      |
| Article 4 Direction              | Historic Park/Garden II*      | Locally Listed Buildings |
| Scheduled Monuments              | Historic Park/Garden Ungraded |                          |





## Heritage Impact Assessment

- |                                  |                               |                          |
|----------------------------------|-------------------------------|--------------------------|
| Assessment Site                  | Conservation Area             | Listed Building I        |
| 500m Search Radius               | Historic Park/Garden I        | Listed Building II       |
| Archaeological Notification Area | Historic Park/Garden II       | Listed Building II*      |
| Article 4 Direction              | Historic Park/Garden II*      | Locally Listed Buildings |
| Scheduled Monuments              | Historic Park/Garden Ungraded |                          |

NOT TO SCALE

CB

17/10/2024

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## **Appendix 2: Distribution of Growth (Small Growth Villages) Addendum**

North Norfolk District Council

# **Addendum to Background Paper 2: Distribution of Growth (Small Growth Villages)**

Contains details of the methodological approach to identify a number of additional proposed Small Growth Villages, prepared in response to the Planning Inspectors Interim Findings on the Norfolk North Local Plan Examination.

**November 2024**

**North Norfolk District Council  
Planning Policy Team**

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**All documents can be made available in  
Braille, audio, large print or in other languages.**



**Addendum to Background Paper 2: Distribution of Growth  
(Small Growth Villages)**

## 1. Introduction

- 1.1 This Paper has been produced in response to the Inspector's Post Examination Hearings letter<sup>1</sup> received in July 2024, and in particular, to the Inspectors conclusion that the Local Plan needs greater certainty in bringing forward more housing. This Paper provides evidence in relation to one of the Inspectors directions with regards to the Small Growth Village tier of the settlement hierarchy in order to achieve the required housing growth. The Inspectors letter at paragraph 48, refers to:

*(iii) Expansion of the list of Small Growth Villages to include those with a single key service and (say) three secondary/ desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not included.*

- 1.2 At paragraph 49 of the letter, the Inspector confirms the national planning policy support for seeking such amendments to the Small Growth Village through paragraph 79 of the NPPF, 2021 (paragraph 83 of the NPPF 2023), which states that:

*'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.'*

- 1.3 The Inspector concluded in paragraph 49 that, as 'submitted the plan's policies for smaller villages, even some with key services, are unusually restrictive.' Consequently, the objective of this Paper is to assess and identify further villages that can be considered for small scale growth, in response to the Inspector's soundness concerns.
- 1.4 During the Local Plan Hearing Sessions document EX034(a)<sup>2</sup> was provided, at the Inspectors request, which included a list of villages that fell immediately below being identified as Small Growth Villages, having one key service and three secondary or desirable services. Ten villages were identified from the Regulation 18 stage assessment within the Distribution of Growth Background Paper 2<sup>3</sup> as having one key service and three secondary or desirable services. These settlements are the core group that have been assessed using the same methodology as for the existing 22 identified Small Growth Villages, apart from the reduction of the required number of secondary or desirable services being present from four to three, as proposed by the Inspector.
- 1.5 In addition, a broader review of the villages within Background Paper 2 that did not meet the Small Growth Village criteria has been carried out. This has identified the villages of Erpingham and Felmingham as meeting the revised services and facilities criteria.

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<sup>1</sup> Examination Library Reference EH006(f) [eh006-f-inspectors-post-examination-hearings-letter.pdf \(north-norfolk.gov.uk\)](#)

<sup>2</sup> Examination Library Reference EX034(a): [ex034-a-response-to-inspectors-information-request-to-the-council-small-growth-villages.pdf \(north-norfolk.gov.uk\)](#)

<sup>3</sup> Examination Library Reference C2: [Home | 4: Evidence base and supporting documents \(north-norfolk.gov.uk\)](#)

- 1.6 For clarity, the same general data and documents, as cited in Background Paper 2, have been used as the evidence base to support the additional village assessments. The local housing need information has been updated to provide a more current snapshot of the Council's Housing Waiting List.

## 2. Summary of Methodology

- 2.1 All of the stages of the methodology are set out in detail in the Distribution of Growth Background Paper 2. The stages and their conclusions have been summarised below for reference:

- Stage 1 – Defining Important Services

This stage sets out the twelve core facilities and services that are regarded as being the most important to the sustainability of settlements and where the availability of some services is considered to be more critical than others in relation to the smaller settlements. Consequently, for villages, the services are separated into three categories of 'Key Services', 'Secondary Services' and 'Desirable Services.'

- Stage 2 – Initial Sift, identifying settlements which had a school and/or a shop

The presence of a school and/or a convenience shop are considered to be essential core services and as such, the Background Paper sifted all settlements to ensure one of these key services was identified in the settlements. This initial sift identified a total of 60 settlements (all 7 towns and 53 villages). The settlements that did not have either a school or a convenience shop were excluded from further assessment (para. 4.5 of Background Paper 2) at this stage.

- Stage 3 – Second Sift, identifying settlements with at least 1 key service and 4 secondary or desirable services

The second sift identified those remaining settlements with all identified services together with those which have a shop or school and at least four of the other identified services. Appendix 1 of the Background Paper provides a summary list of the facilities and services within each village (this table was duplicated in the requested Hearings document, reference EX034(a)). The initial list of 53 villages reduced to 28.

- Stage 4 – Constraints (Environmental and Infrastructure), having regard to historic environment, flood risk, coastal erosion, environmental designations, and landscape character.

A detailed environmental assessment of identified settlements is carried out. This considers the degree to which growth in each of the remaining settlements may be constrained having regard to historic environment, flood risk, coastal erosion, environmental designations and landscape character.

Table 3 of Background Paper 2 details the three environmental constraint classifications which are concluded as being either Highly Constrained, Moderately Constrained or Limited Constraints. At this stage, consideration is also given to infrastructure constraints,

reflecting the Council's Infrastructure Position Statement and any known infrastructure considerations regarding each settlement.

- Stage 5 – Housing Need and potential availability of sites (need and capacity).

This stage of the methodology considers the number of people on the Council's Housing Waiting List, concluding as either Higher, Moderate or Lower Demand. The amount of available land as published in the Council's Housing & Economic Land Availability (HELAA) is also assessed and concludes as being Higher, Moderate or Lower Land Availability.

Following the approach of the methodology, an overall conclusion is reached taking account of access to services, facilities and infrastructure, the possible environmental impacts of development, the identified need for development and the opportunities (capacity) to address these needs.

- 2.2 For the purposes of this Paper, Stage 3 of the methodology has been amended in order to assess the suitability of the villages that had been identified as having one key service and three secondary or desirable services.

### **3. Assessment of additional villages**

- 3.1 The Local Plan Hearing document EX034(a) identified the ten villages of, Beeston Regis, Itteringham, Langham, Neatishead, Northrepps, Great Ryburgh, Stibbard, Swanton Abbott, Tunstead and Worstead as having one key service and three secondary or desirable services. The opportunity has also arisen to take a wider review of the other villages within Background Paper 2, Distribution of Growth, which identified the villages of Erpingham and Felmingham as having the requisite level of services and facilities. Overall, twelve villages have been assessed within this Paper.
- 3.2 A detailed assessment has been carried out for each of the villages through the application of Stage 2 through to Stage 5 of the methodology summarised in Section 2 above and where an amended qualifying benchmark of one key service and three secondary or desirable services at Stage 3 is applied. An overall conclusion regarding the suitability of the settlement being identified as a Small Growth Village is reached at the end of each assessment.

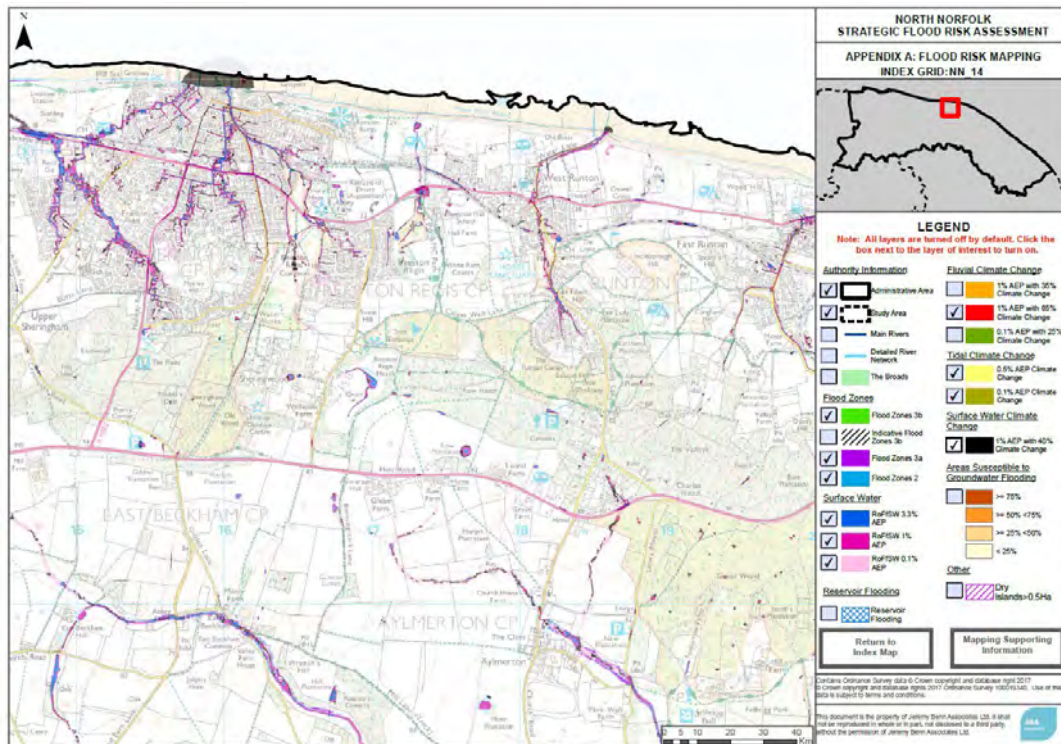
## Beeston Regis

3.3 Beeston Regis was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 1,097 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>N</b>	
	Convenience Shopping	<b>N*</b>	*Cromer Road Stores and Sheringham Tesco’s outside settlement boundary.
	GP surgery	<b>N*</b>	*Sheringham Medical Practice (outside settlement boundary).
<b>Secondary Services</b>	Main Road	<b>Y</b>	A149 (bus route)  Sheringham Train Station (outside settlement boundary).
	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>N*</b>	*Fishmongers Tavern (nearest) and others (outside settlement boundary).
	Meeting Place (e.g. Village Hall)	<b>N</b>	
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>Y</b>	Regent Garage
	Place of Worship	<b>Y</b>	All Saint’s Church
	Employment Land	<b>N*</b>	*no specific designation but many commercial/ retail employment opportunities in Sheringham.
Built Environment			
<ul style="list-style-type: none"> <li>Beeston Regis Conservation Area centres around Beeston Regis Priory, a Scheduled Ancient Monument and the associated land on the north side of the main road (A149) and bounded by Nelson Road to the east and the railway line to the north.</li> <li>Grade I listed building – Remains of St Mary’s Priory and All Saints Church.</li> <li>Grade II listed building – Abbey Farmhouse.</li> </ul>			
Natural Environment			
<i>Flood risk</i>			



The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The settlement is located within Flood Zone 1 and where the built form of the village is subject to pockets of surface water flooding, predominantly along roads.



### Coastal erosion

The settlement of Beeston Regis is not within the Coastal Erosion Constraints Area/ Coastal Change Management Area.

The area east of Beeston Bump along the immediate coastal frontage is within the Coastal Erosion Constraints Area/ Coastal Change Management Area, the closest point of which is located approximately 500m from the village of Beeston Regis.

### Environmental designations

- The built form on the east side of Briton's Lane up to the main road (A149) is within the National Landscape designation. Most of the built form of the village (on the west side of Briton's Lane) is outside but adjacent to the Norfolk Coast National Landscape designation.
- Beeston Regis (and Sheringham) Common SAC and SSSI immediately to the west.
- Briton's Lane Gravel Pit SSSI, Candidate County Geodiversity Site approximately 350m to the south
- Roman Camp and Beeston Regis Heath CWS approximately 350m to the south.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Coastal Shelf landscape type and Wooded Glacial Ridge to the south.

The Coastal Shelf landscape type is categorised by the cliffs stretching along the coastline, where the presence of the sea defines views throughout this landscape area. The settlements

within the area are seen as having a distinctive character and historical value providing a sense of place. The character of the skyline is also of high importance within the Coastal Shelf landscape character area, particularly the views from the Cromer Ridge to the coast and vice-versa.

The LCA vision for this landscape character area is a richly diverse coastal landscape of biodiverse and productive farmland and resilient semi-natural habitats which provide the distinctive and scenic setting for well-maintained and cohesive historic settlements, creating a strong focus for sustainably managed tourism and recreation. Settlements will be clearly separated by a network of seminatural habitats and farmland, with connectivity between these areas wherever possible. New development will be well integrated into the landscape and local vernacular, with a sensitive approach to lighting to maintain dark skies, and opportunities will be sought to better integrate existing coastal development. Restoration and enhancement of valued landscape features will occur alongside the managed and/or natural change of the coastline in response to climate change and erosion.

To the south of the village the landscape is categorised by the Wooded Glacial Ridge landscape type. This area is defined by the distinctive and prominent landform and land cover. The extensive and diverse woodland areas, including large areas of ancient woodland provide strong habitat connectivity for a range of woodland species. As a result of this the area is defined by a strong sense of remoteness, tranquillity and dark skies.

The LCA vision for this landscape character area is of an area dominated by wooded high ground which forms a distinct setting to settlements and which 202 effectively contains and isolates any development but nonetheless provides a strong network of recreational and leisure opportunities. Wooded areas and other important semi-natural habitats, in particular areas of heathland, form a strong, well connected biodiversity network. Any new residential development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular, and the landscape retains, in many locations, a strong sense of tranquillity and remoteness. The special qualities of natural beauty of the Norfolk Coast National Landscape, which encompasses most of the area, are preserved.

### Infrastructure Constraints

No known infrastructure constraints.

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Beeston Regis is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Beeston Regis.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 877 people on the housing waiting list expressed a preference to live in Beeston Regis.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

#### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 3 potentially suitable sites totalling 308 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

#### **Conclusion**

- Beeston Regis itself has no key services and three secondary or desirable services. However, the settlement is situated in very close proximity to the higher order settlement of Sheringham, which is identified as a Small Growth Town, where there are many services and facilities that are highly accessible to residents of Beeston Regis being well connected by footpaths and the road network.
- There are limited environmental constraints and no known infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement is identified as a '**Small Growth Village**', given it's very close proximity to Sheringham, a Small Growth Town, where a wide range of facilities and services are highly accessible to the residents of Beeston Regis. In addition, there are limited environmental and infrastructure constraints associated with the settlement and moderate housing need.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Beeston Regis it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land

availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

### Erpingham

- 3.4 Erpingham was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 736 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>Y*</b>	Erpingham Primary School  *(outside settlement boundary)
	Convenience Shopping	<b>N*</b>	*nearest at garage in Alby to the east and in Aldborough to the north
	GP surgery	<b>N*</b>	*nearest Aldborough Surgery to the north
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N*</b>	*nearest PO at Alby to the east and Aldborough to the north
	Other Shopping	<b>N*</b>	*nearest Alby Crafts and café to the northeast
	Public House	<b>Y</b>	The Spread Eagle
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Erpingham with Calthorpe Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	St. Mary’s Church  *(outside settlement boundary).
	Employment Land	<b>N</b>	
Built Environment			

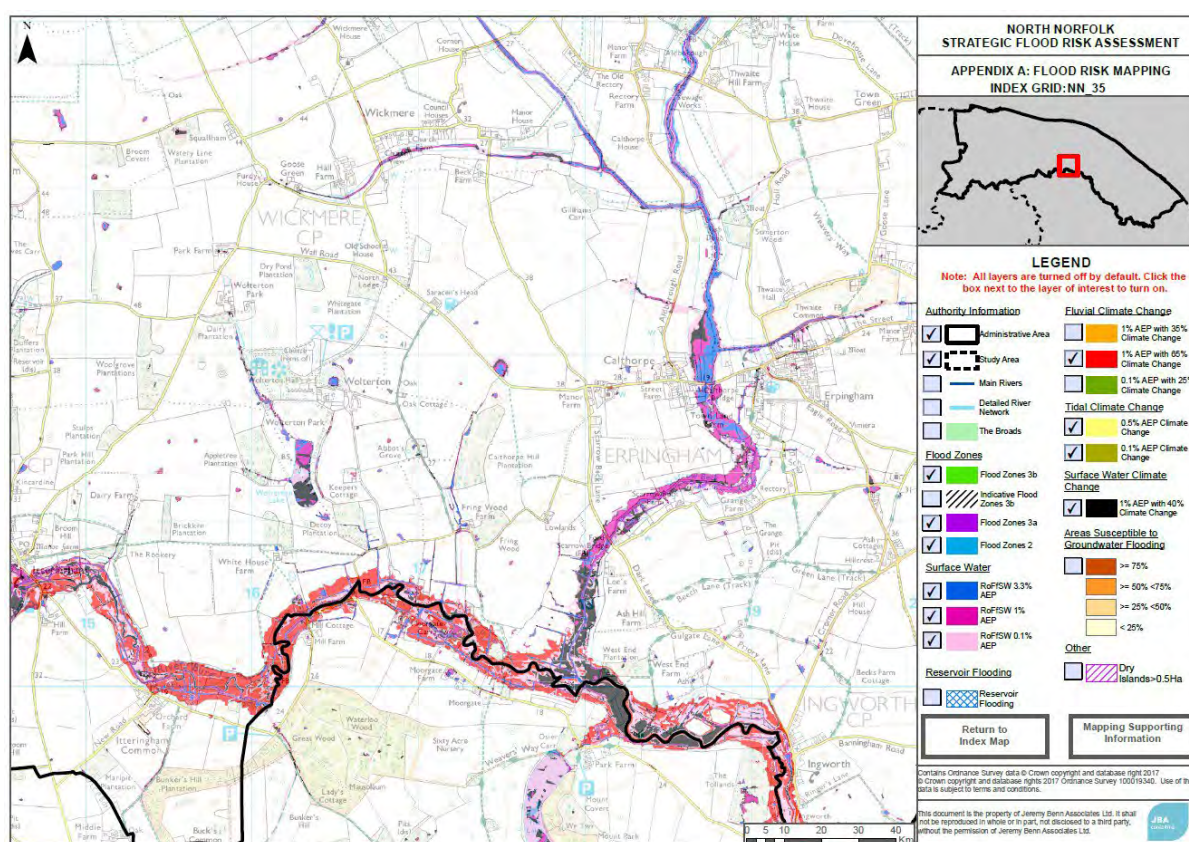


- Mannington and Woolterton Conservation Area bounds the north of the village and includes the southern part of the parish including the primary school and the eastern part of the village adjacent to the village hall.
- Grade I listed building – St. Mary’s Church
- Grade II listed buildings – including Erpingham House, The Thatched Barn at Lime Tree Farm, Homestead Farm Cottages.

## Natural Environment

### Flood risk

The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. A significant area of Flood zones 2 and 3a run north to south further to the west of the village and these zones follow the south side of Thwaite Common. The majority of the village is within Flood zone 1, where there is small pockets of surface water flooding along a section of The Street.



### Coastal erosion

N/A

### Environmental designations

- Thwaite Common CWS – located to the north of the village.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys (River Bure and tributaries) landscape type and is partially within and surrounded by Tributary Farmland landscape type.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

### Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Erpingham is identified within Affordable Housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Erpingham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3

and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 23<sup>rd</sup> September 2024, 660 people on the housing waiting list expressed a preference to live in Erpingham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

#### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is potentially one large site identified totalling 79 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

#### **Conclusion**

- Erpingham has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria for a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

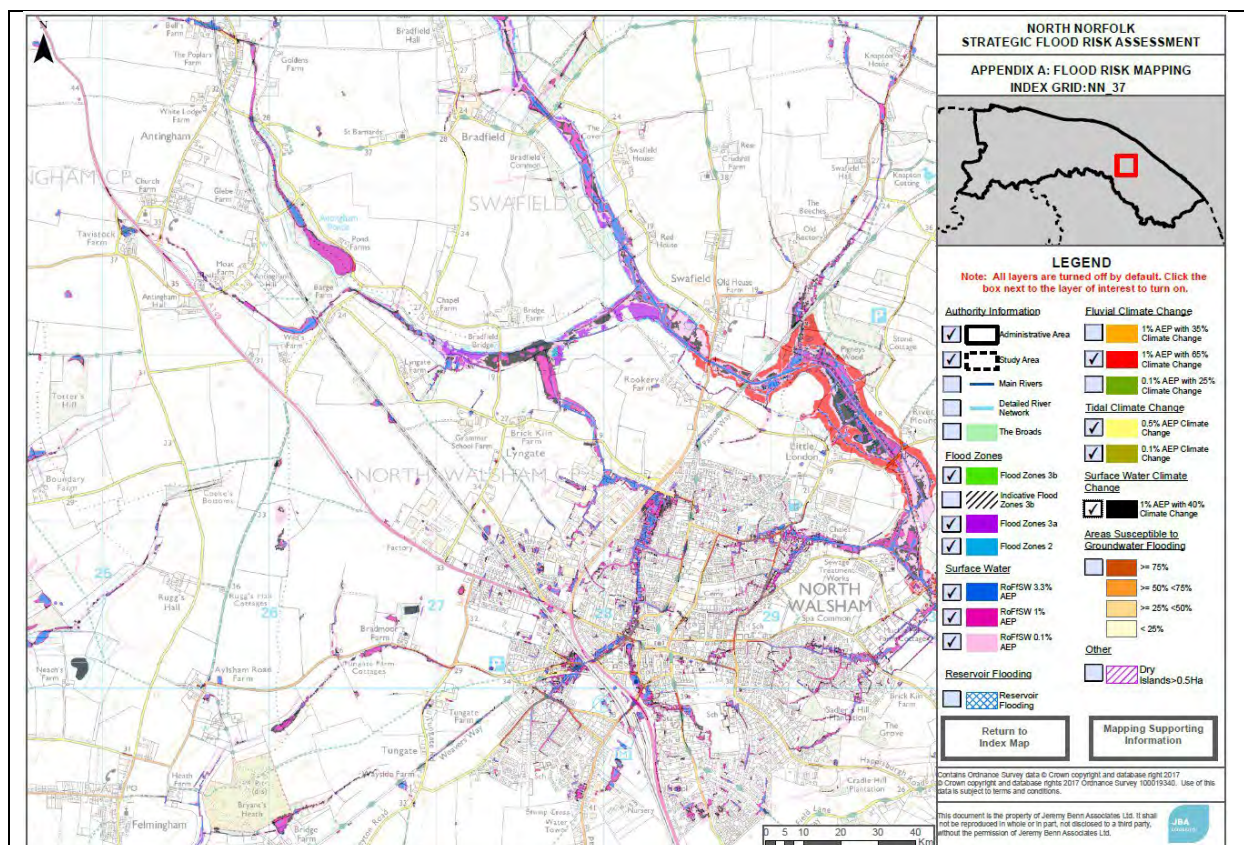
Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Erpingham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

## Felmingham

- 3.5 Felmingham was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 591 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>N</b>	
	Convenience Shopping	<b>Y</b>	Felmingham Stores
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>Y</b>	Within Felmingham Stores
	Other Shopping	<b>N</b>	
	Public House	<b>N</b>	
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Felmingham Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	St.Andrew’s Church *adjacent to settlement boundary
	Employment Land	<b>N</b>	
Built Environment			
<ul style="list-style-type: none"> <li>Grade II* listed building – St. Andrew’s Church</li> </ul>			
Natural Environment			
<b>Flood risk</b>  The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is located within Flood Zone 1.			





## Coastal erosion

N/A

## Environmental designations

- Bryant's Heath SSSI approx.500m to the east of the village.
- Weavers Way CWS approx.450m to the south of the village.
- Felmingham Cutting LNR approx.450m to the south of the village.

## Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

## Infrastructure Constraints

- No known infrastructure constraints.

## Housing Need and Land Supply

### *Housing Need*

As part of the Plan Wide Viability Assessment, Felmingham is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Felmingham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 23<sup>rd</sup> September 2024, 725 people on the housing waiting list expressed a preference to live in Felmingham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is one potentially large suitable site totalling 51 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### *Conclusion*

- Felmingham has one key service and three secondary or desirable services.
- There are limited environmental constraints and no known infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria to be identified as a **‘Small Growth Village’**, based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as ‘Small Growth Villages’ have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council’s Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Felmingham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

### **Great Ryburgh**

- 3.6 Great Ryburgh was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 662 people in 2016. The Great Ryburgh Neighbourhood Plan (2019-36) was adopted in June 2021. Policy 3: Infill Housing in Great Ryburgh, supports the small scale infill development of new dwellings within the defined settlement boundary.
- 3.7 The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>N</b>	
	Convenience Shopping	<b>Y</b>	Ryburgh Village Shop
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>Y</b>	Within Ryburgh Village Shop
	Other Shopping	<b>N</b>	
	Public House	<b>N</b>	
	Meeting Place (e.g. Village Hall)	<b>N</b>	
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	

	Place of Worship	Y*	St. Andrew's Church  *adjacent to settlement boundary
	Employment Land	Y*	Crisp Malt, brewing malt suppliers  *adjacent to settlement boundary

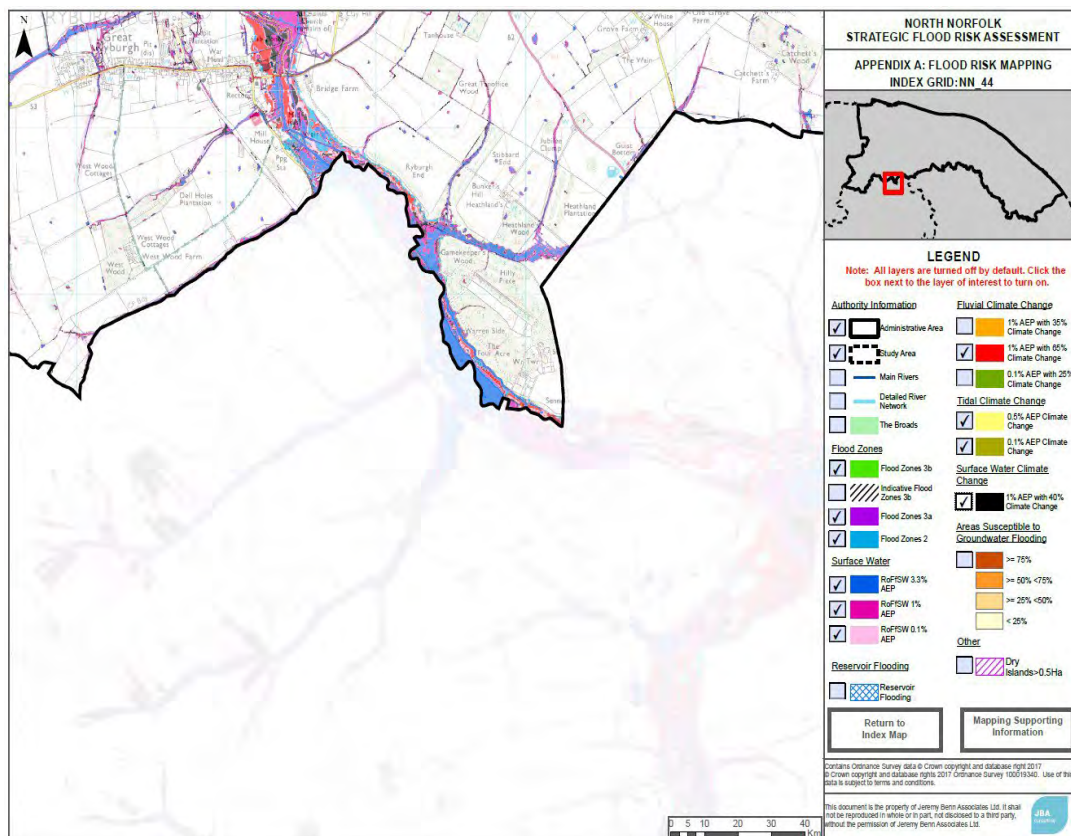
## Built Environment

- Great Ryburgh Conservation Area covers the south and east of the village from the (former) railway line in the west and the river Wensum to the north and east.
- Grade II\* listed building - St Andrews Church
- Grade II listed buildings – Boar Inn, Melody House, Three Penny Cottage, Great Ryburgh War Memorial, 21 Fakenham Road
- Archaeological – mid Anglo-Saxon burial site adjacent to River Wensum (source: Great Ryburgh NP)

## Natural Environment

### Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the east by areas in flood zones 2, 3a and 3b. There are pockets of surface water beyond the built environment to the south and north and along some of the local roads. The majority of the village falls within flood zone 1.



### Coastal erosion



N/A
<p><i>Environmental designations</i></p> <ul style="list-style-type: none"> <li>• West Wood CWS approximately 900m to the south.</li> <li>• River Wensum SAC and SSSI at the closest, approximately 150m to the east (subject to nutrient neutrality strategy) and which extends north of the village.</li> </ul>
<p><i>Landscape character</i></p> <p>North Norfolk Landscape Character Assessment (LCA, 2021)</p> <p>This identifies that the village is largely situated within the River Valleys landscape type with the Tributary Farmland landscape type predominantly to the south and west.</p> <p>The River Valleys (Wensum and Tributaries) landscape type provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views. The Wensum is the largest river in the District, with a typical wide valley floor and low, often indistinct, valley sides. The town of Fakenham and the extended village of Hempton effectively meet at the valley floor and there is a complex interplay of settlement, riverine, industrial and surprisingly high quality ecological land types within a very small and discrete area.</p> <p>The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.</p> <p>The Tributary Farmland landscape character type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggest, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.</p> <p>The LCA vision for this landscape character area is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.</p> <p>Policy 4: Landscape Character, Ryburgh Neighbourhood Plan (NP) – development proposals must demonstrate how they are informed by, and sympathetic to, the key characteristics and landscape guidelines of the Landscape Character Areas as defined in the Ryburgh Landscape Character Assessment (C.J Yardley Landscape, 2019).</p> <p>Landscape Character Areas have been defined, where the main built form of the village is immediately surrounded by the following landscape character areas: Little Ryburgh Area,</p>

Northern Enclosed Wensum Valley Floor, South of Great Ryburgh small valley, South of Great Ryburgh small Field Landscape and Western Tributary Farmland.

See Ryburgh LCA document on NP webpage for full descriptions (Examination documents (June 2020) Evidence Pack) [Home | Ryburgh Neighbourhood Plan \(north-norfolk.gov.uk\)](https://www.norfolk.gov.uk/ryburgh-neighbourhood-plan).

### Infrastructure Constraints

- Catchment school is Stibbard All Saints CE VA Primary School – potential future need for additional provision, monitored through Local Plan.
- Accessibility – C roads/ unclassified roads.
- Within nutrient neutrality foul water drainage and surface water catchments (River Wensum).

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Great Ryburgh is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Great Ryburgh.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 666 people on the housing waiting list expressed a preference to live in Great Ryburgh.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

#### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 5 potentially suitable sites totalling 466 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### Conclusion

- Great Ryburgh has one key service and three secondary/ desirable services.
- There are limited Environmental constraints and moderate Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a **'Small Growth Village'**, based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into account the policies of the Ryburgh Neighbourhood Plan (2019-36) and the environmental constraints, including the historic built environment and known infrastructure constraints. However, for Great Ryburgh it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

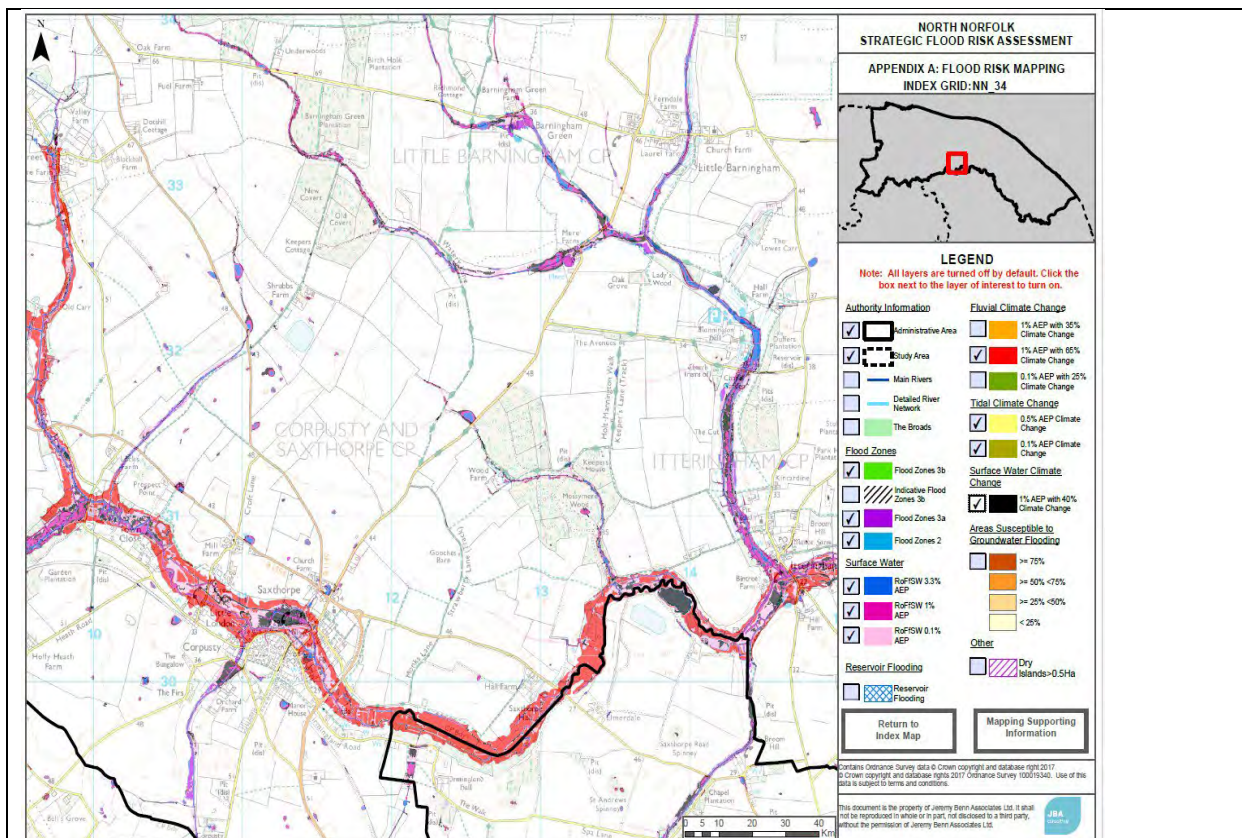
### Itteringham

3.8 Itteringham was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 135 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>N</b>	
	Convenience Shopping	<b>Y</b>	Itteringham Village Shop
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N*</b>	*(within village shop), open two mornings a week.

	Other Shopping	<b>N*</b>	*Itteringham Village Shop incorporates café/ gallery and deli.
	Public House	<b>Y*</b>	The Walpole Arms *outside settlement boundary
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Bure Valley Community Centre (Itteringham Village Hall)
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	St. Mary's Church *adjacent to settlement boundary
	Employment Land	<b>N</b>	
<b>Built Environment</b>			
<ul style="list-style-type: none"> <li>• Itteringham Conservation Area covers many of the buildings within the parish.</li> <li>• Grade II listed buildings – including the Old Rectory, Village Shop, Hill Farm</li> <li>• Grade II* listed buildings - St. Mary's Church, Manor House</li> </ul>			
<b>Natural Environment</b>			
<p><i>Flood risk</i></p> <p>The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the south and west by areas of flood zones 2 and 3a, where there is also surface water flooding, associated with the River Bure. The majority of the village is within flood zone 1.</p>			





## Coastal erosion

N/A

## Environmental designations

- Land adjacent to New Cut CWS approximately 180m to the west.
- Itteringham Gravel Pit Candidate County Geodiversity Site approximately 700m to the southwest.

## Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys landscape type with the Tributary Farmland landscape type to the northeast and northwest.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and

development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

### Infrastructure Constraints

- Accessibility - C roads/ unclassified roads.
- Within nutrient neutrality surface water catchment (River Bure)

### Housing Need and Land Supply

#### Housing Need

As part of the Plan Wide Viability Assessment, Itteringham is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Itteringham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 606 people on the housing waiting list expressed a preference to live in Itteringham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there is 1 potentially suitable site totalling 10 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### **Conclusion**

- Itteringham has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement meets the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Itteringham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

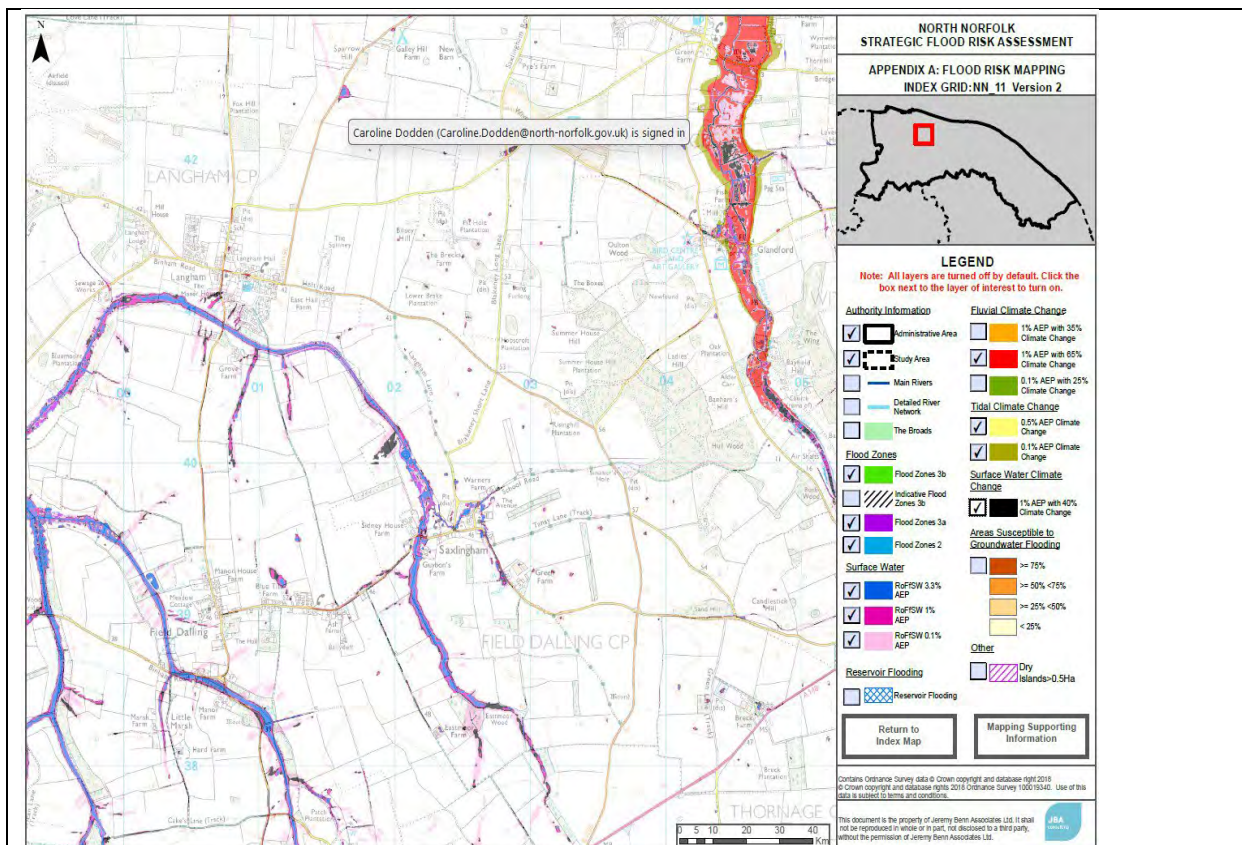
## **Langham**

3.9 Langham was identified as 'Countryside' in the Core Strategy (2008). The settlement was identified as a Small Growth Village at the Regulation 18 stage of the emerging Local Plan but was removed from this tier of the settlement hierarchy at Regulation 19 stage, based on information provided in a consultation response and a subsequent review of all of the identified Small Growth Villages, which revealed that the village had one key service and three secondary or desirable services.

3.10 The settlement had an estimated population of 387 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>Y</b>	Langham Village School
	Convenience Shopping	<b>N</b>	
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>Y</b>	The Langham Blue Bell
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Langham Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y</b>	St. Andrew's & St. Mary's Church
	Employment Land	<b>N*</b>	*potential employment opportunities at hotel
Built Environment			
<ul style="list-style-type: none"> <li>Langham Conservation Area is located around the historic core of the village, with St. Andrew's &amp; St. Mary's Church at its centre.</li> <li>Grade II listed buildings – including The Old House, Brambling Barn, Rowan Cottage, The Blubell, Langham House, The Rectory, Old Manor Farmhouse, Orchard House, Grove Farmhouse, Manor Cottage.</li> <li>Grade I listed building – St. Andrew's &amp; St. Mary's Church</li> </ul>			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the south by the River Stiffkey. There are further pockets of surface water flooding within the village itself, predominantly in the south west of the built environment. The majority of the settlement is situated within Flood Zone 1.</p>			





### Coastal erosion

N/A

### Environmental designations

- The northern part of the village (north side of the Holt Road) is within the Norfolk Coast National Landscape and the southern part is outside, but adjacent to the designation.
- Langham Lane Meadow CWS approximately 850m to the southeast.
- Bilsey Hill SSSI / Little Bilsey Plantation Candidate County Geodiversity Site approximately 1.1km to the east.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the River Valleys landscape type in the southern part of the village and Tributary Farmland landscape type in the northern part.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valley (Stiffkey and tributaries) landscape type is characterised by steep sided and canalised lower reaches, with a scenic coastal character. The natural beauty of the river valley landscape downstream of Wighton is recognised by its inclusion within the Norfolk Coast National Landscape, and, where the river meets the coastal marshes, the North Norfolk Heritage Coast.

The LCA vision for this landscape type is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### Infrastructure Constraints

- No known constraints.

### Housing Need and Land Supply

#### Housing Need

As part of the Plan Wide Viability Assessment, Langham is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Langham.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 690 people on the housing waiting list expressed a preference to live in Langham.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

### Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 2 potentially suitable sites totalling 430 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### Conclusion

- Langham has one key service and three secondary/ desirable services.
- There are moderate Environmental constraints and no known Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Langham it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

### **Neatishead**

- 3.11 Neatishead was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 541 people in 2016. Neatishead village straddles the boundaries of North Norfolk and the Broads Authority to the east. Some of the services and facilities are located in neighbouring hamlets. In particular, Neatishead Primary School is situated approximately 800 metres to the south within the settlement of Butcher's Common and the parish church of St. Peter's is located approximately 1.5km to the southeast in the settlement of Threehammer Common.
- 3.12 The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

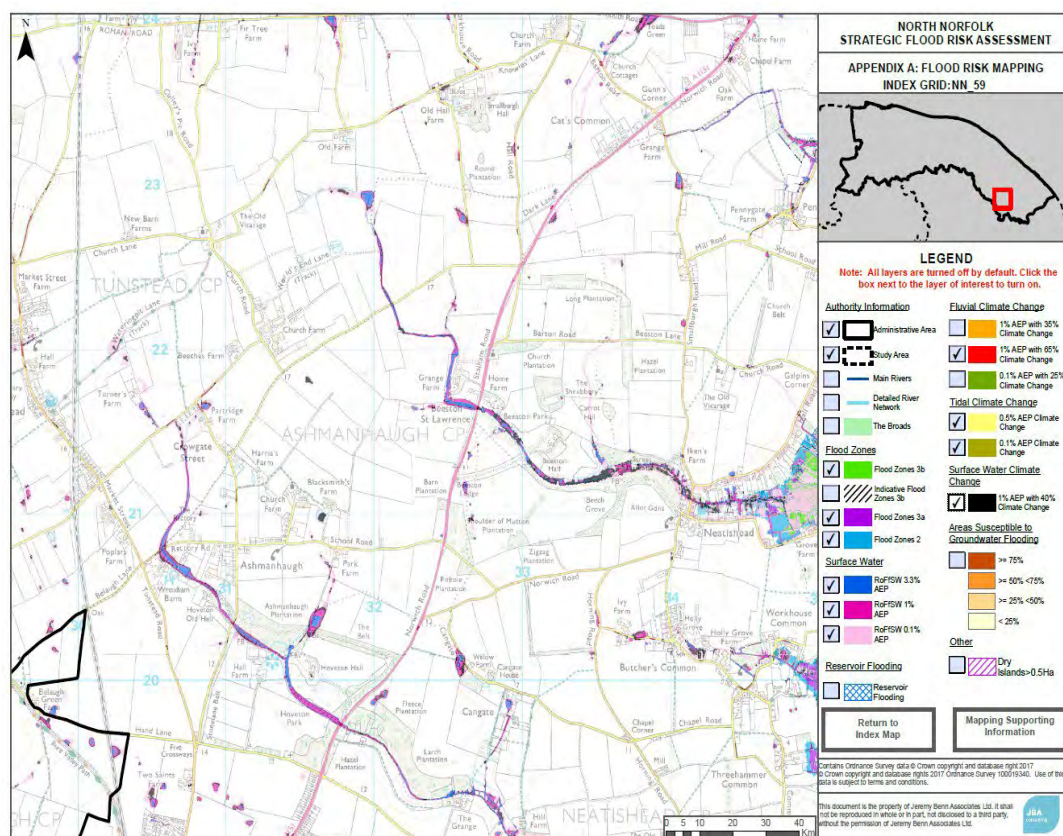
### Services and Facilities

<b>Key Services</b>	Primary School	<b>Y*</b>	Neatishead Primary School *located outside settlement boundary - within neighbouring hamlet of Butcher's Common
	Convenience Shopping	<b>Y</b>	White House Stores
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>Y</b>	White Horse Inn
	Meeting Place (e.g. Village Hall)	<b>Y</b>	New Victory Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	*St. Peter's Church  located within neighbouring hamlet of Threehammer Common.
	Employment Land	<b>N</b>	
<b>Built Environment</b>			
<ul style="list-style-type: none"> <li>Neatishead Conservation Area covers the majority of the buildings within the village surrounding Limekiln Dyke extending out to Iken's farm to the north and the properties on the south side of The Street.</li> <li>The Conservation Area Appraisal (adopted May 2011)- Broads Authority. Extract from Para. 11: <i>The North Norfolk section of the conservation area adjoins to the south west, to include the remainder of the village; the boundary runs from Irstead Road behind the built up area to the south to join Street Hill, then down Street Hill and turns to the west to include the old Victory Hall and the buildings adjacent, along the edge of Street Plantation, then running roughly parallel to Smallburgh Road to include Iken's Farm and arable land to the north west and back down the Smallburgh Road to join the Broads Authority section of the conservation area at the junction with Hall Road. Appendix 4 of the Conservation Area Appraisal lists 18 buildings that make a positive contribution to the character of the conservation area.</i></li> <li>Grade II listed buildings including - Wherry Arch, Grove House, Barn at Grove House, The Old Laundry, March House, Ikens Farmhouse and Barn at Ikens Farm.</li> </ul>			
<b>Natural Environment</b>			
<i>Flood risk</i>			



The following map shows the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The area of Neatishead village within North Norfolk district is within flood zone 1.

The area within the Broads Authority particularly associated with Limekiln Dyke falls within flood zones 2, 3a and 3b. There are small pockets of surface water flooding and more substantial areas that follows the line of the watercourse through Neatishead that feeds into Limekiln Dyke.



### Coastal erosion

N/A

### Environmental designations

- Barton Broad SSSI, SAC, SPA and Ramsar 11- wetland to the east.
- Ant Broads and Marshes National Nature Reserve to the east.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland and River Valleys landscape types.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is

integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

The River Valleys (River Ant and Tributaries) character area provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### Infrastructure Constraints

- Within nutrient neutrality foul water drainage catchment (River Bure).

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Neatishead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Neatishead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 673 people on the housing waiting list expressed a preference to live in Neatishead.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.
<p><i>Supply of suitable sites</i></p> <p>The Council's Housing &amp; Economic Land Availability Assessment (HELAA) Part 1 (2017) did not identify any sites at Neatishead.</p> <p>*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.</p>
<b>Conclusion</b>
<ul style="list-style-type: none"> <li>Neatishead Village itself has 1 key service and 2 secondary/ desirable services. Neatishead Primary School is located within the neighbouring hamlet of Butchers Common to the south and St. Peters Church is located in the hamlet of Threehammer Common further to the southeast.</li> <li>There is a lack of safe and sustainable access to the school and church from Neatishead Village (no footpath and rural single lane roads).</li> <li>There are moderate Environmental constraints and limited Infrastructure constraints.</li> <li>There is moderate housing need demand and no known land availability.</li> </ul> <p>The village of Neatishead would only meet the criteria for a Small Growth Village when considered in combination with an outlying hamlet. Given the dispersed nature of the facilities and services across three settlements and the lack of safe and sustainable access between them. As such, the village of Neatishead is identified as being in the '<b>Countryside</b>' for the purposes of Policy SS1.</p>

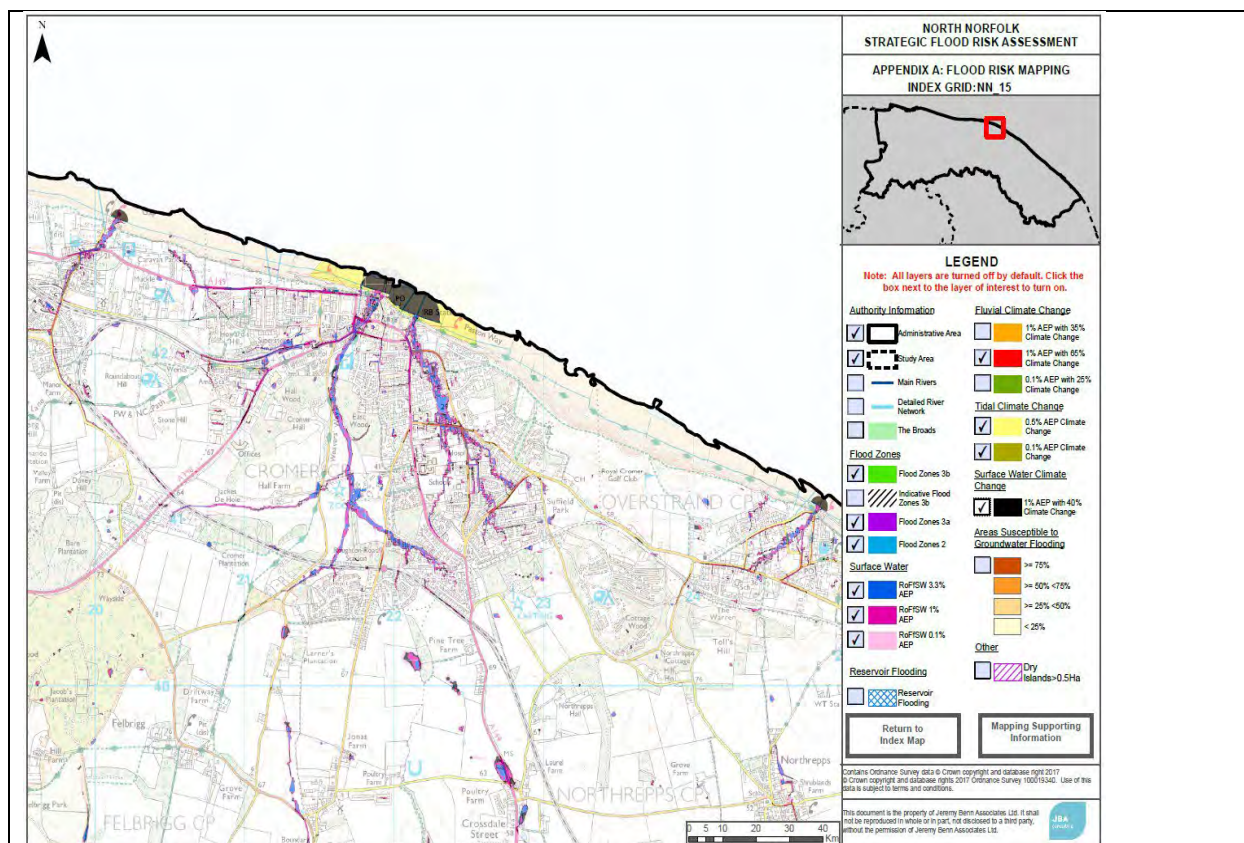
### **Northrepps**

- 3.13 Northrepps was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 1,102 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

<b>Services and Facilities</b>			
<b>Key Services</b>	Primary School	<b>Y</b>	Northrepps Primary School (and Preschool)
	Convenience Shopping	<b>N</b>	
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	

	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>Y</b>	The Foundry Arms
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Northrepps Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	St. Mary The Virgin Church *adjacent to settlement boundary
	Employment Land	<b>N</b>	
<b>Built Environment</b>			
<p>Northrepps Conservation Area is centred around the historic core of Church Street, extending to the southwest to include St.Mary the Virgin Church.</p> <ul style="list-style-type: none"> <li>• Grade I listed building – St.Mary’s Church</li> <li>• Grade II listed buildings including – Northrepps War memorial, Church Farmhouse, Church Grange, Old Manor House</li> </ul>			
<b>Natural Environment</b>			
<p><i>Flood risk</i></p> <p>The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is in flood zone 1, where there is some surface water flooding close to Shrublands Farm and along two roads.</p>			





### Coastal erosion

N/A

### Environmental designations

- Within the Norfolk Coast National Landscape designation.
- Overstrand Disused railway CWS approximately 700m to the northeast.
- Templewood Estate CWS approximately 600m to the southeast.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is largely situated within the Tributary Farmland with a southern area within the River Valleys landscape type.

The Tributary Farmland landscape type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggests, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valleys (Mundesley Beck) character area is defined by the Mundesley Beck. This is the shortest of North Norfolk's river valleys, running parallel to the coast a little over 1km inland for

most of its 7km length. This small river draws its waters from a superficial aquifer comprised predominantly of sands and gravels and has largely been canalised. However, it is understood that the section of river from Frogshall through to the Templewood Estate was restored to its natural meandering state approximately 10 years ago. With the exception of the area around Mundesley, the valley is almost wholly within the Norfolk Coast National Landscape.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Northrepps is identified within Affordable housing Zone 2, which is considered to represent the area with higher levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 35% affordable housing on all developments of 6 dwellings or more in Northrepps.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 893 people on the housing waiting list expressed a preference to live in Northrepps.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

### Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 5 potentially suitable sites totalling 150 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### Conclusion

- Northrepps has one key service and three secondary/ desirable services.
- There are moderate Environmental constraints and limited Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a **'Small Growth Village'**, based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Proposed growth will need to take into consideration the environmental constraints and known infrastructure constraints. However, for Northrepps it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

### **Stibbard**

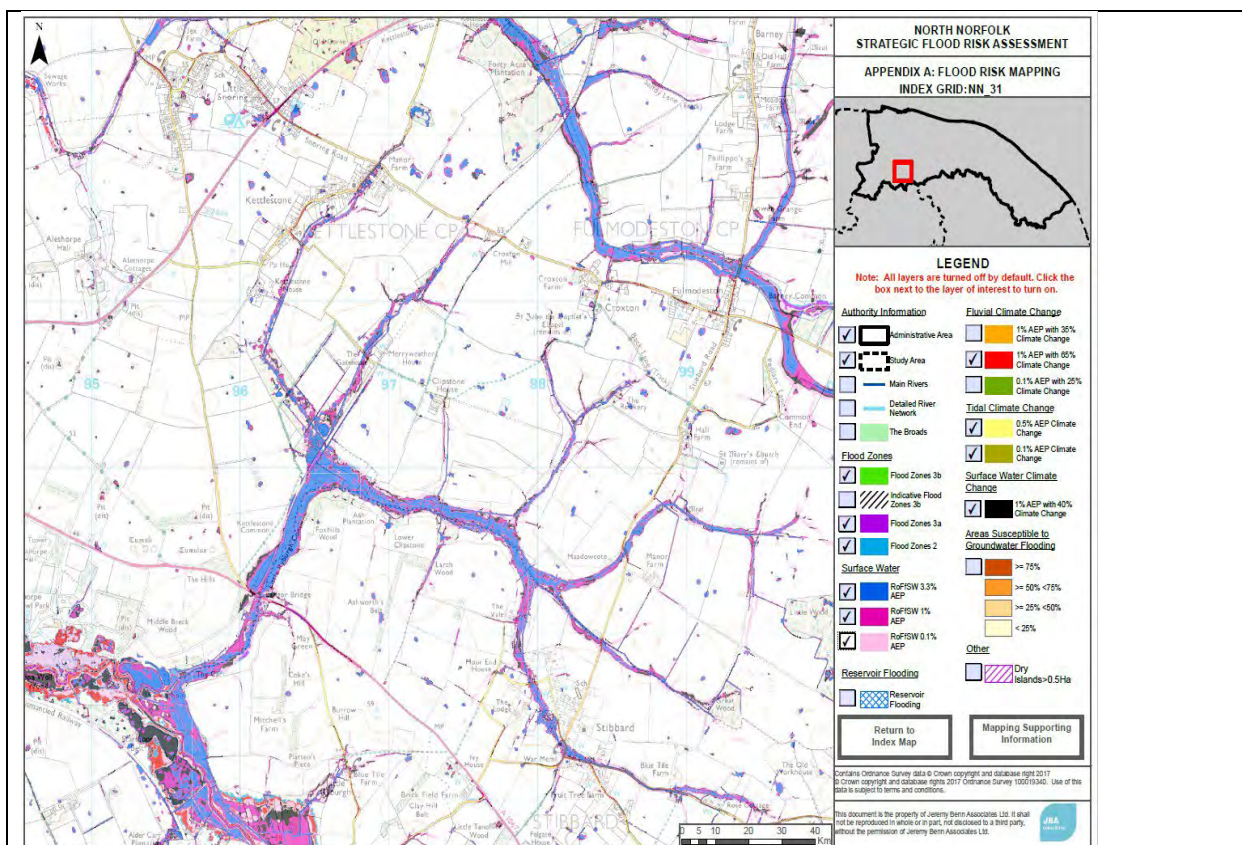
- 3.14 Stibbard was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 329 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

### Services and Facilities

<b>Key Services</b>	Primary School	<b>Y</b>	All Saints CE VA Primary School
	Convenience Shopping	<b>N</b>	

	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N*</b>	* Mobile Post Office visits 1 hour per week
	Other Shopping	<b>N</b>	
	Public House/ Restaurant	<b>Y*</b>	The Ordnance Arms  *located outside settlement boundary
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Stibbard Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	All Saints Church  *outside settlement boundary  Stibbard Methodist Church Centre
	Employment Land	<b>N</b>	
<b>Built Environment</b>			
<ul style="list-style-type: none"> <li>• Grade II* - All Saints Church</li> <li>• Grade II – The Grove, Grove Barn, Holly Farmhouse, The Lodge, Vale Farm.</li> </ul>			
<b>Natural Environment</b>			
<b>Flood risk</b>  The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village falls within flood zone 1. There is surface water flooding associated with the local watercourse that flows through the village from the north and turns east.			





## Coastal erosion

N/A

## Environmental designations

- Fulmodeston Several CWS approximately 1.6km to the west.
- Land north of Guist Bottom approximately 1km to the south.
- River Wensum SAC, SSSI approximately 1.9km to the northwest.

## Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Tributary Farmland landscape type with an area of River Valleys landscape type to the north of the village.

The Tributary Farmland landscape character type is defined by a strong rural character with a sense of remoteness and tranquillity emphasised by the historic field patterns, rural villages, rural lanes and the long distance views across the landscape. As the name suggest, it forms the catchment area for a number of watercourses feeding into the main river valleys of the Stiffkey, Glaven and Bure.

The LCA vision for this landscape character area is a well-managed and actively farmed rural landscape that invests in natural capital, creating and enhancing ecological networks and semi-natural habitats. New development is successfully integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character with dark night skies.

The River Valleys (Wensum and Tributaries) landscape type provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a

pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views. The Wensum is the largest river in the District, with a typical wide valley floor and low, often indistinct, valley sides. The town of Fakenham and the extended village of Hempton effectively meet at the valley floor and there is a complex interplay of settlement, riverine, industrial and surprisingly high quality ecological land types within a very small and discrete area.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### Infrastructure Constraints

- Stibbard All Saints CE VA Primary School – potential future need for additional provision, monitored through Local Plan.
- Accessibility – C roads/ unclassified roads.
- Within nutrient neutrality foul water drainage and surface water catchments (River Wensum).

### Housing Need and Land Supply

#### Housing Need

As part of the Plan Wide Viability Assessment, Stibbard is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Stibbard.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as of 15<sup>th</sup> August 2024, 634 people on the housing waiting list expressed a preference to live in Stibbard.

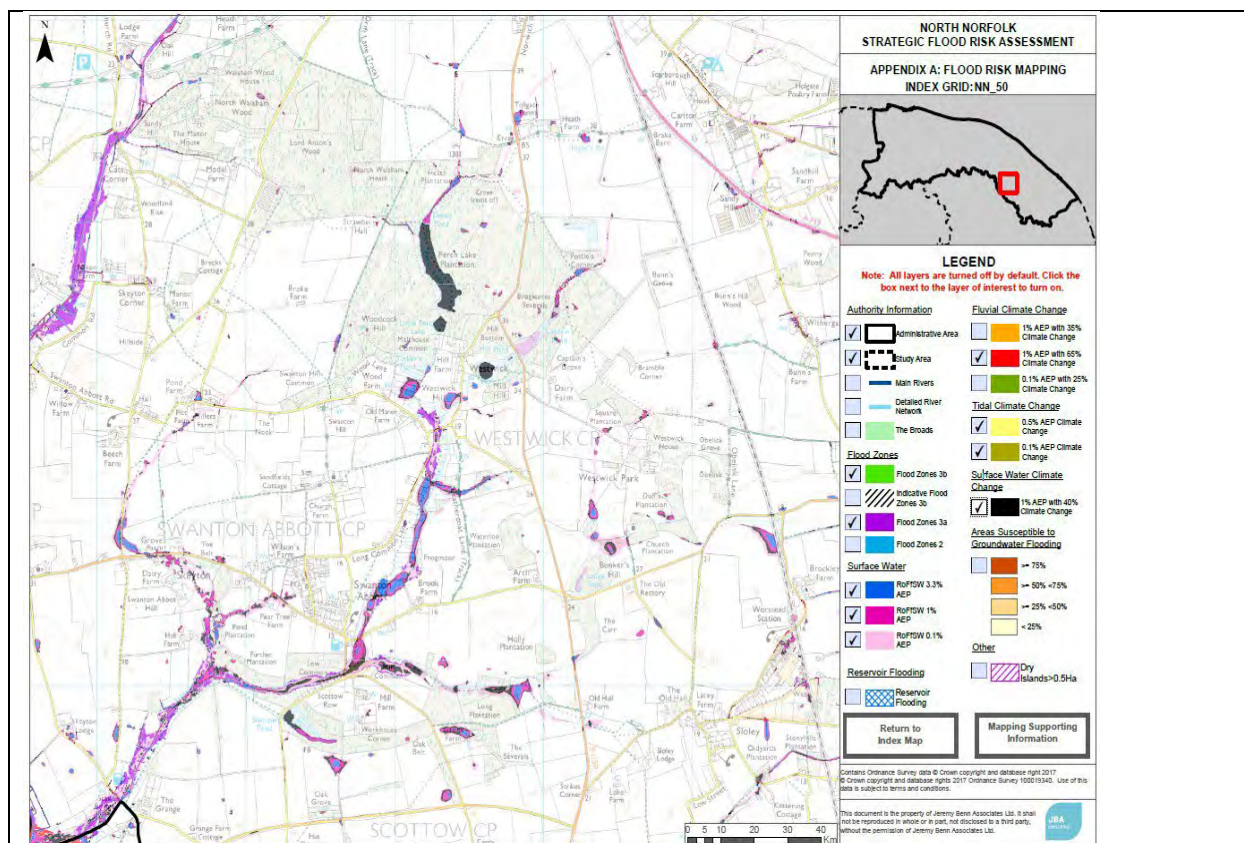
<p>The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.</p> <p>The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.</p>
<p><i>Supply of suitable sites</i></p> <p>The Council's Housing &amp; Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 3 potentially suitable sites totalling 93 dwellings*.</p> <p>*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.</p>
<p><b>Conclusion</b></p> <ul style="list-style-type: none"> <li>• Stibbard has one key service and three secondary/ desirable services.</li> <li>• There are limited Environmental and Infrastructure constraints.</li> <li>• There is moderate housing need demand and lower land availability.</li> </ul> <p>The settlement does meet the criteria of a '<b>Small Growth Village</b>', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.</p> <p>Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.</p> <p>Any proposed growth will need to take into consideration any environmental constraints, including the historic built environment and known infrastructure constraints. However, for Stibbard it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.</p>

### **Swanton Abbott**

- 3.15 Swanton Abbott was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 541 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

Services and Facilities			
<b>Key Services</b>	Primary School	<b>Y*</b>	Swanton Abbott Community Primary School (and Pre-School)  *approx. 500m to the north of the village (can be accessed by footpath Swanton Abbott FP3)
	Convenience Shopping	<b>N</b>	
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>N</b>	
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Swanton Abbott Village Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	Swanton Abbott Community Chapel  St. Michael's Church  *to northeast of village
	Employment Land	<b>N</b>	
Built Environment			
<ul style="list-style-type: none"> <li>• Grade II* - St. Michael's Church</li> <li>• Grade II – War Memorial at St. Michael's Church, Lilac Farmhouse.</li> <li>• Westwick House, unregistered Historic Park and Garden (HPGU/15) is located approximately 1.4km to the east.</li> </ul>			
Natural Environment			
<p><i>Flood risk</i></p> <p>The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village is constrained to the east, south and west by areas in flood zones 2 and 3a and surface water in association with Westwick Beck and Stake bridge Beck. The village's built form is largely within flood zone 1.</p>			





## Coastal erosion

N/A

## Environmental designations

- Low Common & Plantations County Wildlife Site (CWS) approximately 150m to the south.
- Westwick Estate Meadow CWS approximately 300m to the east/ northeast.

## Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the main part of the village is situated within the Low Plains Farmland landscape type with the River Valleys landscape type running across the southern part the village from northeast to southwest following Westwick Beck.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by

the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.
- Within nutrient neutrality foul water drainage and surface water catchments (River Bure).

### Housing Need and Land Supply

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Swanton Abbott is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Swanton Abbott.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 678 people on the housing waiting list expressed a preference to live in Swanton Abbott.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

### Supply of suitable sites

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 4 potentially suitable sites totalling 164 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

### Conclusion

- Swanton Abbott has one key service and two secondary/ desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does not meet the criteria of a 'Small Growth Village', based on the methodology using a revised Stage 3 requirement for one key service and three secondary or desirable services. As such, the village of Swanton Abbott is identified as being in the '**Countryside**' for the purposes of Policy SS1.

### **Tunstead**

- 3.16 Tunstead was identified as 'Countryside' in the Core Strategy (2008). The settlement had an estimated population of 1,083 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement's position within the hierarchy.

### Services and Facilities

<b>Key Services</b>	Primary School	<b>Y</b>	Tunstead Primary School
	Convenience Shopping	<b>N</b>	
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N</b>	
	Post Office	<b>N</b>	
	Other Shopping	<b>N</b>	
	Public House	<b>Y</b>	Horse & Groom
	Meeting Place (e.g. Village Hall)	<b>Y*</b>	Tunstead Village Hall *temporary building adjacent to settlement boundary



<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y*</b>	St. Mary the Virgin Church *outside settlement boundary
	Employment Land	<b>N*</b>	*Bure Valley Classics, car dealer to the west

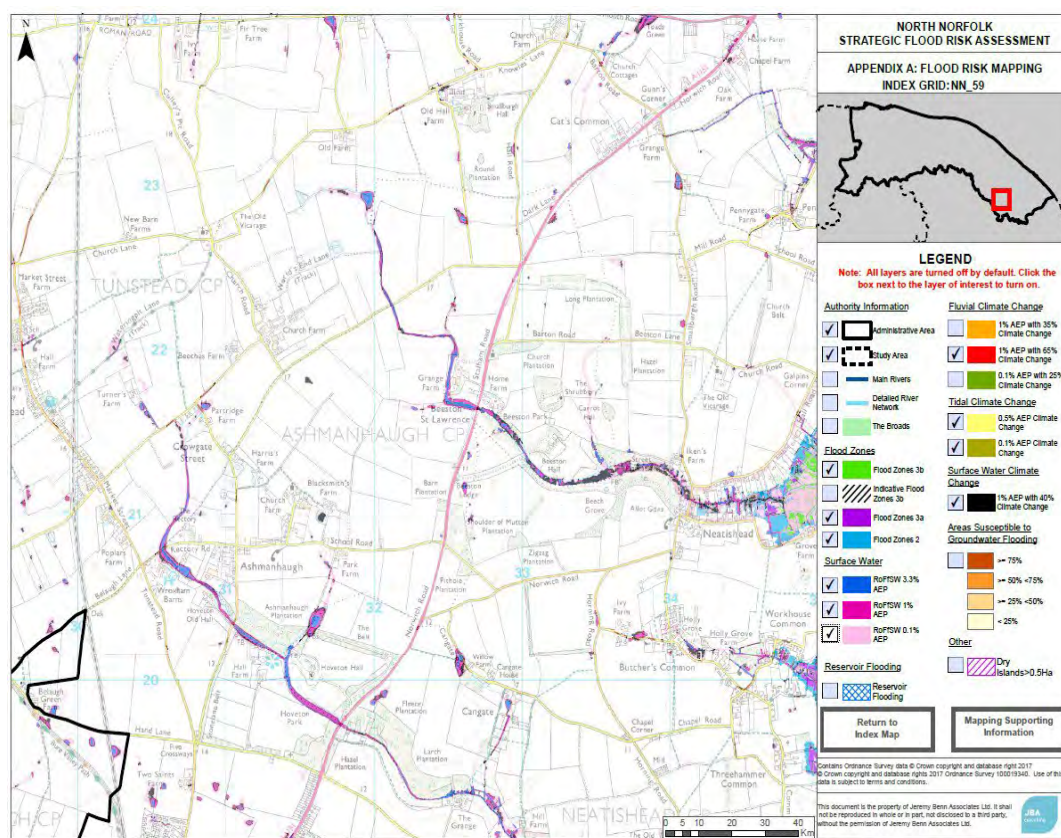
## Built Environment

- Grade I – St. Mary's Church
- Grade II – Tunstead War Memorial, The Manor House, The Hall.

## Natural Environment

### Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village lies within flood zone 1. There are pockets of surface water flooding predominantly along the parts of Market Street and localised surface water flooding to some private properties.



### Coastal erosion

N/A

### Environmental designations

N/A



### *Landscape character*

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type with an area of River Valleys landscape type to the south of the village.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

Parts of three river systems, the Wensum, the Bure and the Ant, feed south and eastward through the District into the Broads. The River Valleys (Bure and Tributaries) landscape type is defined by the valley floors, which provide a strong contrast to the typically open, large-scale arable landscapes through which they pass, characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

### *Infrastructure Constraints*

- Accessibility C roads/ unclassified roads.
- Within nutrient neutrality foul water drainage and surface water catchments (River Bure).

### *Housing Need and Land Supply*

#### *Housing Need*

As part of the Plan Wide Viability Assessment, Tunstead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Tunstead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 734 people on the housing waiting list expressed a preference to live in Tunstead.

The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

#### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) did not identify any potentially suitable sites.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

#### **Conclusion**

- Tunstead has one key service and three secondary or desirable services.
- There are limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and no known land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration any environmental constraints, including to the historic built environment and known infrastructure constraints. However, for Tunstead it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small

scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

### **Worstead**

- 3.17 Worstead was identified as ‘Countryside’ in the Core Strategy (2008). The settlement had an estimated population of 972 people in 2016. The following table sets out the level of services and facilities, summarises the known constraints and identifies the known housing need and land availability. A conclusion is provided regarding these factors, setting out the settlement’s position within the hierarchy.

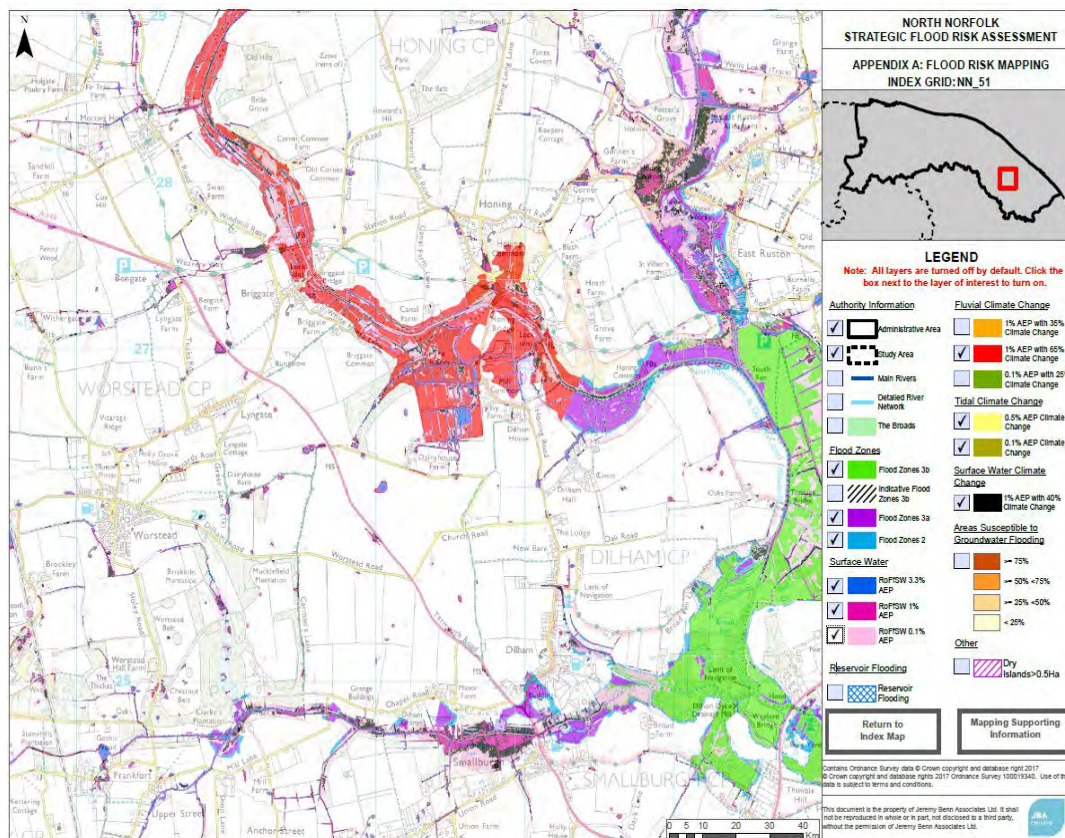
Services and Facilities			
<b>Key Services</b>	Primary School	<b>Y*</b>	Worstead Primary School * outside settlement boundary
	Convenience Shopping	<b>N</b>	
	GP surgery	<b>N</b>	
<b>Secondary Services</b>	Main Road	<b>N*</b>	* Worstead Train Station approx. 1.1km southwest of settlement boundary by road
	Post Office	<b>N*</b>	*Mobile post office visits 1 hour per week
	Other Shopping	<b>N</b>	
	Public House	<b>Y</b>	The White Lady
	Meeting Place (e.g. Village Hall)	<b>Y</b>	Queen Elizabeth Hall
<b>Desirable Services</b>	Petrol Filling Station	<b>N</b>	
	Vehicle Repair Shop	<b>N</b>	
	Place of Worship	<b>Y</b>	Saint Mary the Virgin Church
	Employment Land	<b>N</b>	
Built Environment			
<ul style="list-style-type: none"> <li>Worstead Conservation Area covers the historic core of the village adjacent to St. Mary’s Church and incorporates the majority of buildings to the north, east and south of the church.</li> <li>Grade I – St. Mary’s Church</li> <li>Grade II* - St.Andrew’s Cottage</li> <li>Grade II – The Thatched House, Wall at &amp; the Manor House, Geoffrey The Dyer House, Norwich House &amp; Outbuilding, The White Lady, Telephone Kiosk.</li> </ul>			

- No locally listed buildings.

## Natural Environment

### Flood risk

The following maps show the North Norfolk Strategic Flood Risk Assessment (SFRA) (2018) climate change flood risk layers in relation to fluvial, tidal and surface water flooding. The village falls within flood zone 1. There are small pockets of areas susceptible to surface water flooding around the village and to the southwest.



### Coastal erosion

N/A

### Environmental designations

- Westwick Park County Wildlife Site (CWS) approximately 1.3km to the west.
- Smallburgh Fen SAC, SPA, SSSI approximately 2.8km to the southeast.

### Landscape character

The North Norfolk Landscape Character Assessment (LCA, 2021) identifies that the village is situated within the Low Plains Farmland landscape type with an area of River Valleys landscape type closest to the southeast part of the village.

The Low Plains Farmland landscape type is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The LCA vision for this landscape type is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a 106 mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

The River Valleys (River Ant and Tributaries) character area provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The LCA vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

#### Infrastructure Constraints

- Accessibility – C roads/ unclassified roads.
- Settlement largely within nutrient neutrality small scale discharge – low risk zone.
- Within nutrient neutrality surface water catchment (River Bure).

#### Housing Need and Land Supply

##### Housing Need

As part of the Plan Wide Viability Assessment, Worstead is identified within Affordable housing Zone 1, which is considered to represent the area with lower levels of viability in the District. As such, the affordable housing policy within the emerging local plan seeks at least 15% affordable housing on all developments of 6 dwellings or more in Worstead.

The Central Norfolk Strategic Housing Market Assessment (SHMA) identifies a calculated need for 1,998 affordable properties over the plan period to 2036, where 46% of this is identified for two bedroom houses and 29% for three bedroom houses.

In terms of the Council's housing waiting list, the total number of people on the list was 2,336 people on 15<sup>th</sup> August 2024, where 56% require a 1-bed property, 24% a 2-bed property and for 3 and 4 bed properties, 10% and 9% respectively. The total number of people on the waiting list has decreased by 175 people since May 2022 (2,511).

Amongst those with the highest need (Bands 1 and 2), the percentage requiring a 1 bed property was 15%, a 2 bed property was 17% and for 3 and 4 bed properties, 37% and 43% respectively, which clearly shows the greater need for larger properties in these two Bands than in the wider district.

At a local level, as at 15<sup>th</sup> August 2024, 827 people on the housing waiting list expressed a preference to live in Worstead.



The SHMA also identifies that there is a requirement to provide an additional 725 C2 bed spaces (e.g. care homes) over the plan period 2015-36. The Council is seeking to include provision for specialist elderly accommodation on larger allocations and is generally supportive of provision for such accommodation in sustainable locations.

The Norfolk Older Persons Housing Options Study (2021) sets out the projected additional need for Use Class C2 residents as being 752 bedspaces in North Norfolk over the plan period.

#### *Supply of suitable sites*

The Council's Housing & Economic Land Availability Assessment (HELAA) Part 1 (2017) identifies that there are 2 potentially suitable sites totalling 42 dwellings\*.

\*It is important to note that the HELAA does not represent policy and will not determine whether sites should be allocated in the Local Plan or granted planning permission. It also represents a 'snapshot' of capacity based upon the data and information available (e.g. site constraints, landowner intentions, and site availability) as at 1st August 2016. Site assessments are on an individual site basis, rather than any consideration of cumulative constraints. Furthermore, sites may also overlap and there may be an element of double counting within the numbers.

#### **Conclusion**

- Worstead has one key service and three secondary or desirable services.
- There is moderate constraints on the historic environment given listed buildings and conservation area status, with limited Environmental and Infrastructure constraints.
- There is moderate housing need demand and lower land availability.

The settlement does meet the criteria of a '**Small Growth Village**', based on the methodology using a revised Stage 3 requirement of one key service and three secondary or desirable services.

Settlements categorised as 'Small Growth Villages' have fewer services and facilities than the higher order settlements (i.e. Towns and Large Growth Villages), but still form a valuable functional role within the District; providing services and facilities to both the population of these villages and the wider rural population. By their nature, given the relative size of these settlements, there is generally less housing need (derived primarily from the Council's Housing Waiting List) than the higher order settlements.

Any proposed growth will need to take into consideration environmental constraints, including to the historic built environment. However, for Worstead it is considered that the constraints would not limit the principle of development within the settlement. Therefore, subject to land availability, the Local Plan proposes modest, small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services.

## **Appendix 3: Settlement Boundary Review (Small Growth Villages) Addendum**

North Norfolk District Council

# **Addendum to Background Paper 11: Settlement Boundary Review (Small Growth Villages)**

Contains details of North Norfolk Council's methodological approach to the identification of settlement boundaries in a number of additional proposed Small Growth Villages, prepared in response to the Planning Inspectors Interim Findings on the North Norfolk Local Plan Examination.

**November 2024**



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**All documents can be made available in  
Braille, audio, large print or in other languages.**



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## Addendum to Background Paper 11

### Settlement Boundary Review (Small Growth Villages)

## 1 Introduction

- 1.1. This addendum to Background Paper 11 - Settlement Boundary Review (Small Growth Villages), Examination Library document [C11](#), has been prepared to support the continued Local Plan examination.
- 1.2. Following public examination hearings held in early 2024, the appointed Inspector wrote to the Council setting out that more concrete steps needed to be taken to bring forward more housing. One of the options included the expansion of the list of small growth villages to include those *“with a single key service and (say) three secondary/ desirable services”*.
- 1.3. This document provides a review of the settlement boundaries in a number of potential additional new Small Growth Villages (SGV) which have been subject to review through an addendum to Background Paper 2 - Distribution of Growth [C2] and are being considered as having the potential to meet a revised criterion for SGVs. Where such settlements are subsequently proposed as SGV the accompanying policies map illustrates the proposed boundaries.
- 1.4. The approach follows that as set out original settlement boundary review paper examination library reference [C11], which supported the submitted Local Plan at the examination hearings hearing undertaken in February – March 2024. The Paper details the criteria used when determining if, and how, an existing or former settlement boundary should be changed, or a new one created as detailed below. The tables in Section 2 of this document explain the reasons for the proposed changes, with **Appendix 1** illustrating the proposed changes on an Ordnance Survey base map.
- 
- 1.5. The following table details the Small Growth Villages considered in this document and the starting position from which boundary reviews were undertaken.

Small Growth Village	Starting Position for Boundary Review		
	North Norfolk Local Plan Boundary (1998)	North Norfolk Core Strategy Boundary (2008)	Neighbourhood Plan Established Boundary
Beeston Regis	✓	-	-
Erpingham	✓	-	-
Felmingham	✓	-	-
Great Ryburgh	✓	-	✓
Itteringham	-	-	-

Langham	✓	-	-
Neatishead	✓	-	-
Northrepps	✓	-	-
Stibbard	✓	-	-
Tunstead	✓	-	-
Worstead	✓	-	-

- 1.6. As part of the made [Neighbourhood Plan](#) for Ryburgh in 2021, Policy 3 identifies a settlement boundary for Great Ryburgh village and sought to enable appropriate infill development. This remains the most up to date boundary assessment and it is not considered appropriate to review this boundary as part of the local plan process. Revision, where necessary, should be undertaken through a revised neighbourhood plan process following the adoption of the emerging Local Plan.
- 1.7. New settlement boundaries are identified for the following Small Growth Villages, which have neither a defined settlement boundary in the current spatial hierarchy (Core Strategy, 2008) or in an adopted Neighbourhood Plan:
- Beeston Regis
  - Erpingham
  - Felmingham
  - Itteringham
  - Langham
  - Neatishead
  - Northrepps
  - Stibbard
  - Tunstead
  - Worstead

## What is a Settlement Boundary?

- 1.8. Settlement Boundaries are a policy tool which establishes and contains built-up areas. A settlement boundary is a line drawn on a plan around a town or village, which reflects its built form. The purpose of a settlement boundary is to clearly define where there is a presumption in favour of development within the boundary, subject to compliance with other relevant Local Plan policies.
- 1.9. Areas outside of settlement boundaries are considered as open countryside, where a different policy approach applies regarding the types of development that may be permitted. The communities identified with settlement boundaries have a particular level of key services which underpins the sustainability of further development in that community.

- 1.10. To support this approach, the emerging Local Plan contains policies identifying 'Selected Settlements' with a boundary and illustrates those boundaries on the accompanying Policies Map.
- 

## Methodology for Settlement Boundary Review

- 1.11. A settlement boundary review has been undertaken as a desk-top study for each of the selected Small Growth Villages to ensure the boundaries are up to date and appropriate.

- 1.12. The approach taken for this review is identical to the approach followed in Background Paper 11 - Settlement Boundary Review (Small Growth Villages):

- Existing defined boundaries have been used as a starting point.
- Add in developments and planning permissions which have happened since the original boundaries were defined.
- Add in existing Local Plan allocations where these are yet to be built and where there is a remaining realistic prospect of development happening.
- Remove any former allocations which are now judged unlikely to be built.
- Audit the boundary to ensure it follows the logical extent of existing built-up areas including houses and their gardens (unless extensive incursions into the countryside would result), schools, public houses, commercial buildings, farmhouses and buildings, public parks and open spaces where appropriate. This process has been undertaken to define the extent of currently built-up areas where character is defined by consolidated areas of built development.

- 1.13. In applying the above approach, the following detailed criteria has been applied:

### **Criteria for inclusion within a boundary:**

- a) Existing commitments for built development (i.e. planning permissions);
- b) Existing housing and mixed-use allocations within the Local Plan with the exception of those judged unlikely to be built;
- c) Curtilages of dwellings unless functionally separate to the dwelling or where the land has the capacity to significantly extend the built form of the settlement beyond what is considered to be appropriate;
- d) Properties which can be considered to be an integral part of the settlement (e.g. houses which are separated from adjacent properties by only very narrow gaps and are functionally and visually related to the urban area);
- e) In relation to farmyards and associated building, as a general rule only farmhouses and closely associated outbuildings on a settlement street frontage are included;
- f) School buildings;
- g) Adjoining small scale brownfield sites;
- h) Recreational or amenity open space, which is physically surrounded by the settlement or adjoined on three sides by the settlement;
- i) Doctor Surgeries.

**Criteria for exclusion from a boundary:**

- j) Existing Local Plan allocations which are now judged unlikely to be built.
- k) Areas of land which do not fit into the above categories, but which are presently included in the settlement boundary.

1.14. The process undertaken to audit the boundary includes a number of minor changes in each settlement in order to reflect and align to the latest available ordnance survey base mapping. These changes are considered as minor and logical adjustments and are not specifically referenced in this review.

## 2 Settlement Boundary Review

- 2.1. This section details the key changes made to the boundary for each settlement. Settlements are presented in alphabetical order. Each table explains the reasoning for any changes, including reference to the relevant methodology criteria outlined in section 1.
- 2.2. **Appendix 1** of this document contains mapping which illustrates the extent of the settlement boundaries as amended through this review document.

---

### 2.1 Beeston Regis

The review considered the Local Plan 1998 settlement boundary for Beeston Regis. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
BEE.01	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
BEE.02	G	Adjoining small-scale brownfield site.

### 2.2 Erpingham

The review considered the Local Plan 1998 settlement boundary for Erpingham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
ERP.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
ERP.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages, including curtilage of the Spread Eagle Public House.
ERP.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

---

### 2.3 Felmingham

The review considered the Local Plan 1998 settlement boundary for Felmingham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
FEL.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.



FEL.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.03	K	Delete area of land which does not fit into the criteria but which is presently included within the settlement boundary.
FEL.04	K	Delete area of land which does not fit into the criteria but which is presently included within the settlement boundary.
FEL.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
FEL.07	C, D	Amend boundary to incorporate existing dwelling and its curtilage.

## 2.4 Great Ryburgh

No changes are proposed. It is not appropriate for the Local Plan process to propose changes to an adopted Neighbourhood Plan. The adopted [Ryburgh Neighbourhood Plan](#) Settlement Boundary for Great Ryburgh village is considered up to date and is not subject to review in this document. The settlement boundary can be viewed in Appendix 1.

## 2.5 Itteringham

No settlement boundary has previously been defined for Itteringham. In accordance with the criteria set out within the Settlement Boundary Methodology it is proposed to designate a new settlement boundary as defined in Appendix 1.

## 2.6 Langham

The review considered the Local Plan 1998 settlement boundary for Langham. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
LAN.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages. To reflect permitted change of use of land from agricultural to garden from 1 The Green to 25 Holt Road (PF/01/0671).
LAN.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
LAN. 07	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

## 2.7 Neatishead

The review considered the Local Plan 1998 settlement boundary for Neatishead. In accordance with the criteria set out within the Settlement Boundary Methodology, and subject to the settlement being selected as a SGV, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
NEA.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NEA.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NEA.03	D	Properties which can be considered to be an integral part of the settlement.

## 2.8 Northrepps

The review considered the Local Plan 1998 settlement boundary for Northrepps. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
NTR.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages (recently completed permission PF/20/1781 for 19 dwellings at Broadgate Close).
NTR.03	D, H	Amend boundary to incorporate recreation/amenity open space physically surrounded on three sides (includes village hall). Designate as an Education/Formal Recreational Area.
NTR.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.05	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
NTR.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

## 2.9 Stibbard

The review considered the Local Plan 1998 settlement boundary for Stibbard. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
STB.01	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.03	C, D, F, H	Amend boundary to incorporate school buildings, recreation/amenity open space physically surrounded on three sides, and existing dwelling

		and its curtilage. Designate the relevant open space as an Education/Formal Recreational Area.
STB.04	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.05	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.07	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.08	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
STB.09	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
STB.10	C, D	Amend boundary to incorporate existing dwelling and its curtilage.

## 2.10 Tunstead

The review considered the Local Plan 1998 settlement boundary for Tunstead. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
TUN.01	F	Amend boundary to incorporate all of school building and general hard surfacing and curtilage.
TUN.02	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.03	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.04	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.05	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
TUN.06	C, D	Amend boundary to incorporate existing dwellings and their curtilages.
TUN.07	C, D	Amend boundary to incorporate existing dwelling and its curtilage.
TUN.08	C, D	Amend boundary to incorporate existing dwellings and their curtilages.

PF/24/0665 for three single storey dwellings on land east of market street is pending at the time of review and is therefore not a current commitment as it has no active permission. Therefore, this is not incorporated within the proposed boundary.

## 2.11 Worstead

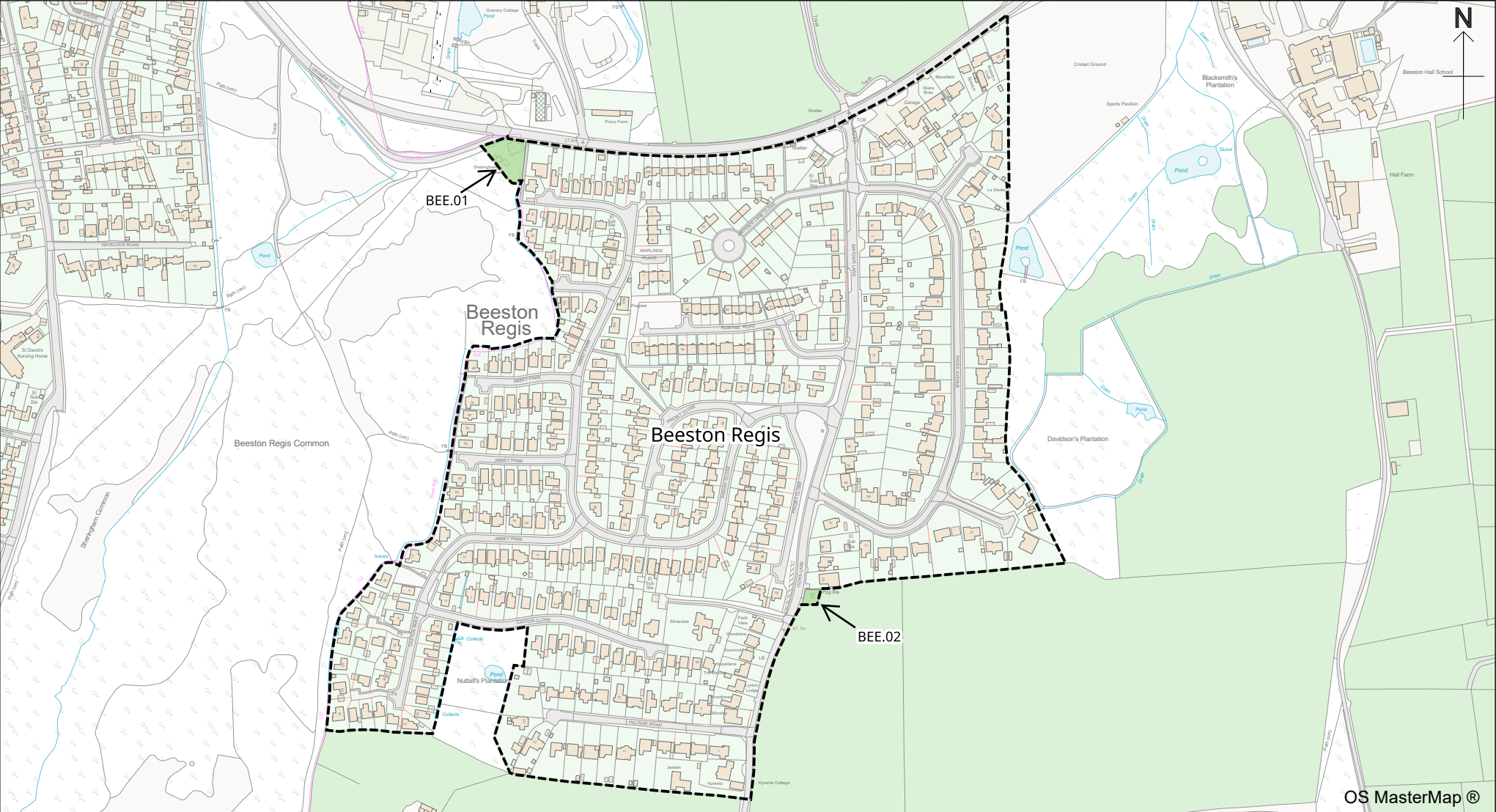
The review considered the Local Plan 1998 settlement boundary for Worstead. In accordance with the criteria set out within the Settlement Boundary Methodology, it is proposed to designate a new settlement boundary as illustrated in Appendix 1, with the following amendments:

Site Reference	Criteria	Comment
WOR.01	C, D, F, H, G	Amend boundary to incorporate recreation/amenity open space physically surrounded on three sides (church yard), existing dwellings and their curtilages, village hall and car park.
WOR.02	G	Adjoining small-scale brownfield site.


## **Settlement Boundary Review (Small Growth Villages) Background Paper Addendum**

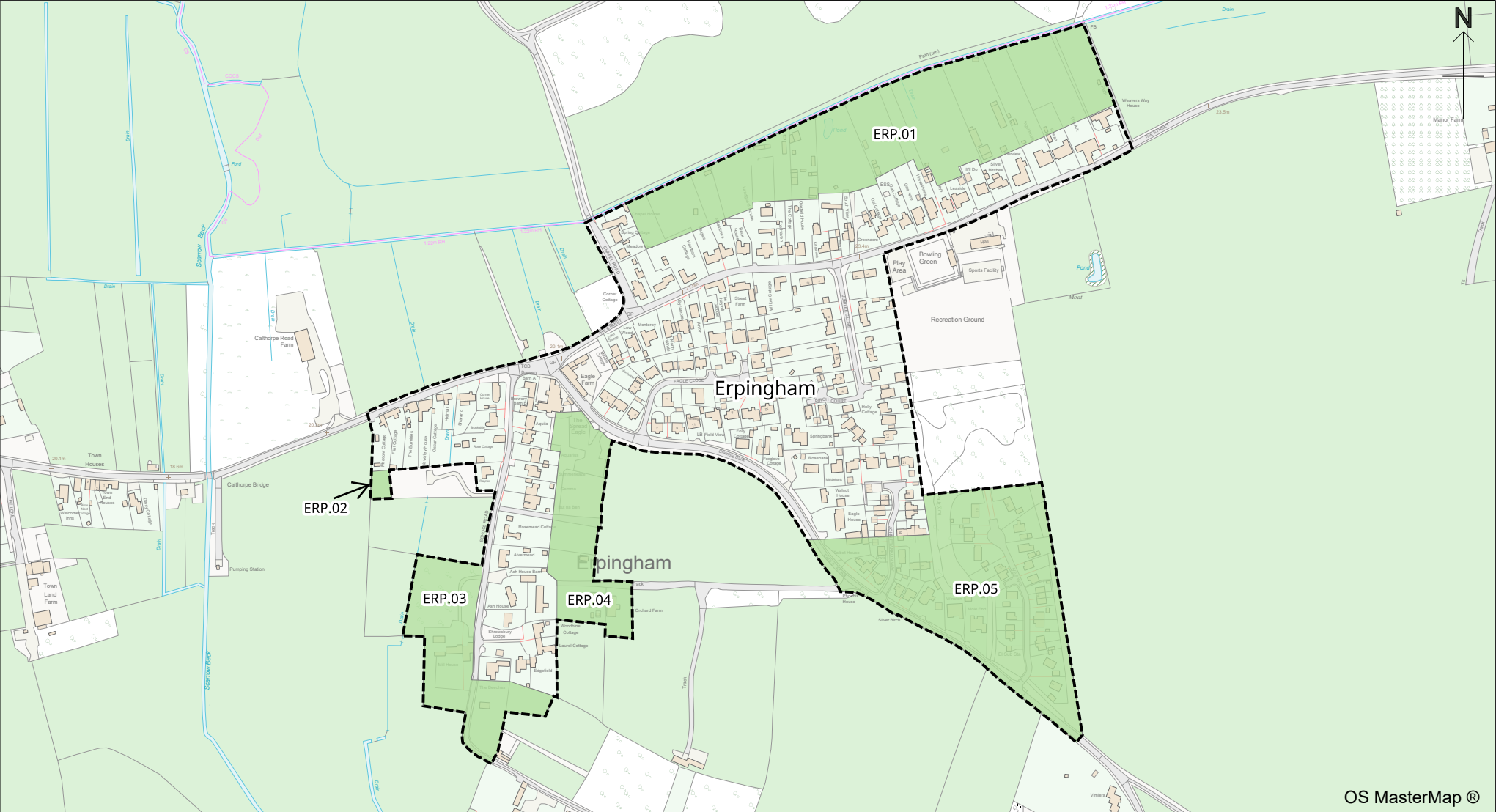
### **Appendix 1: Settlement Maps**

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## Settlement Boundary Review (Small Growth Villages)

### Erpingham

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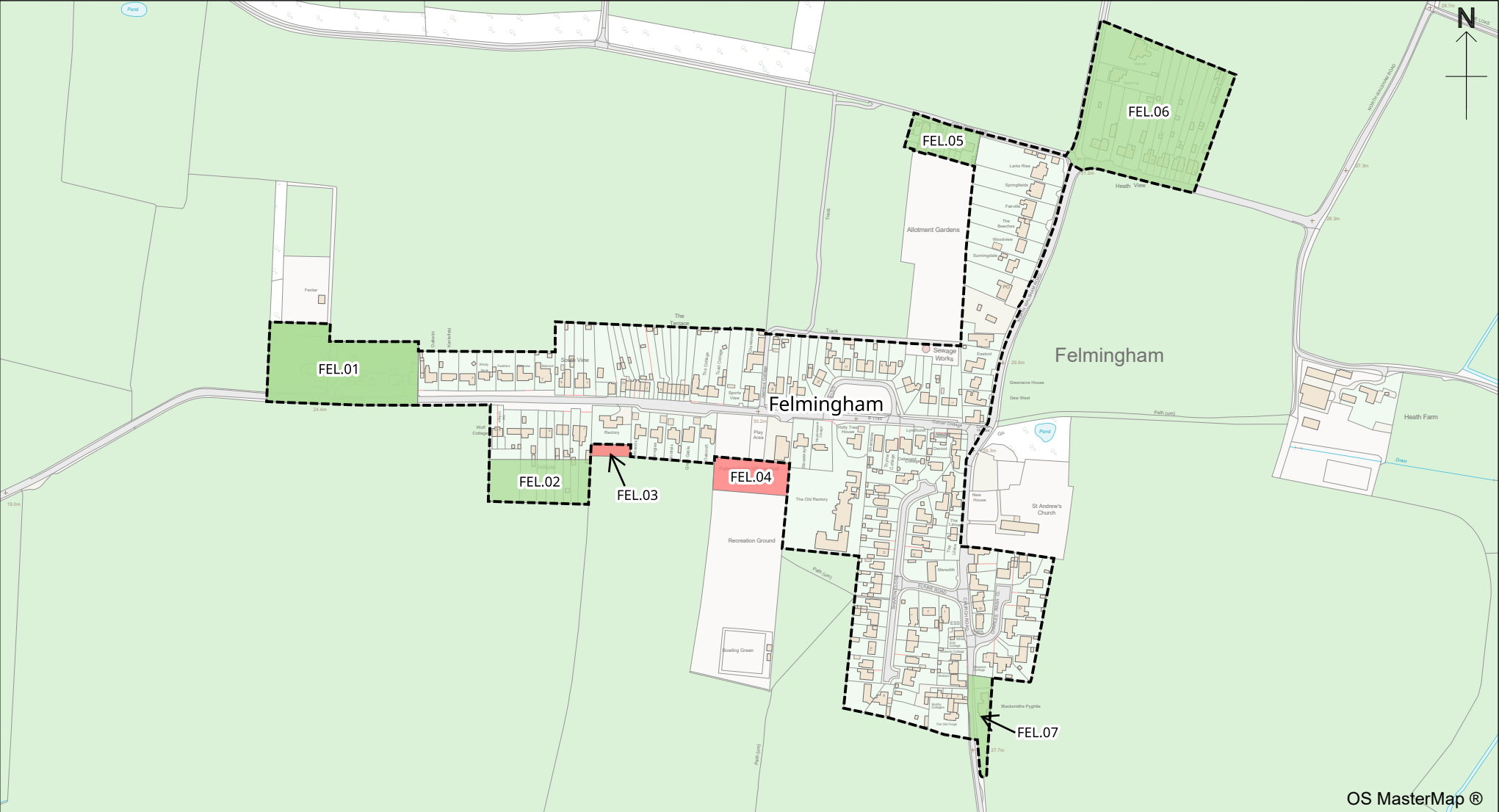
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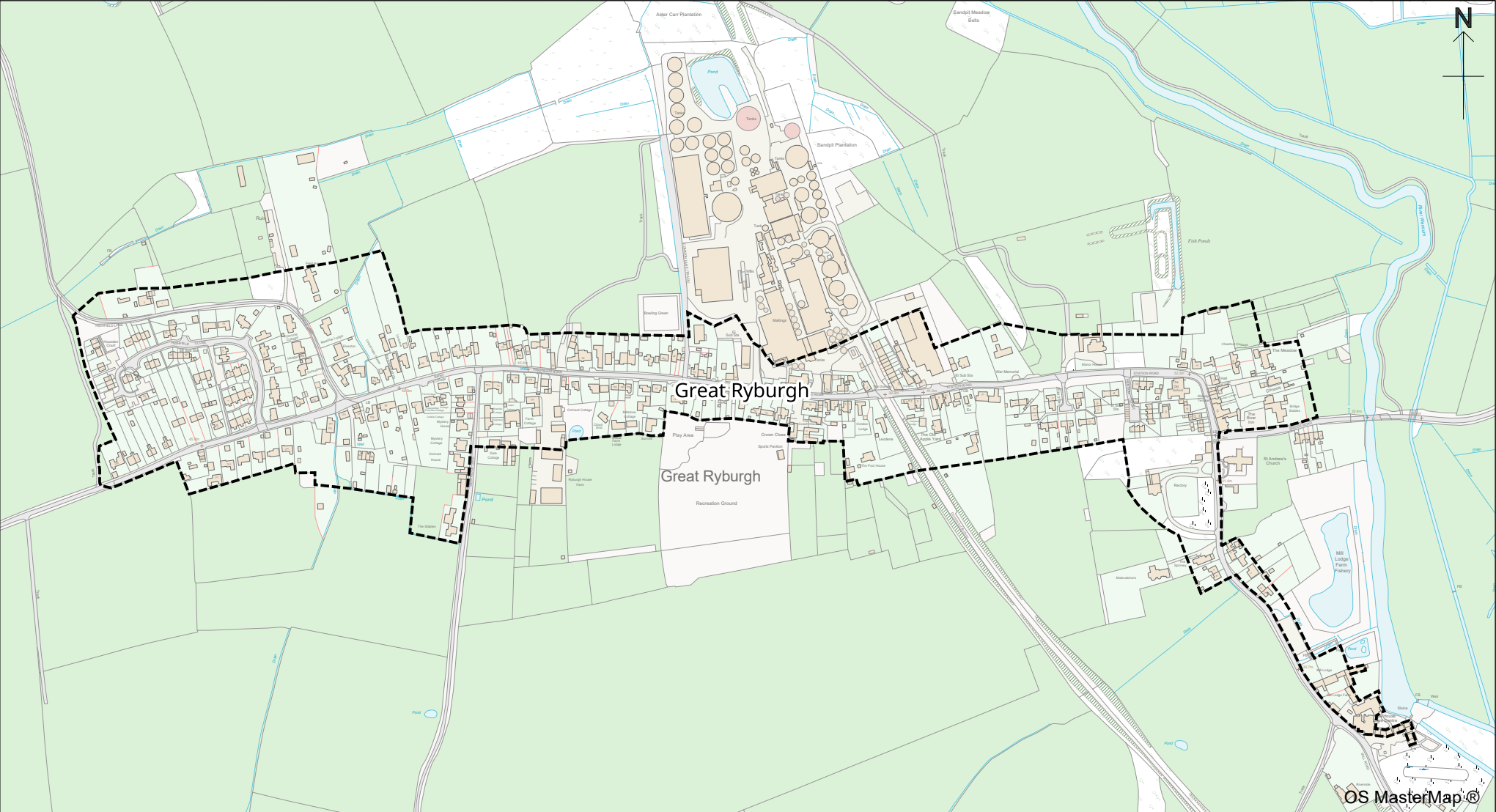
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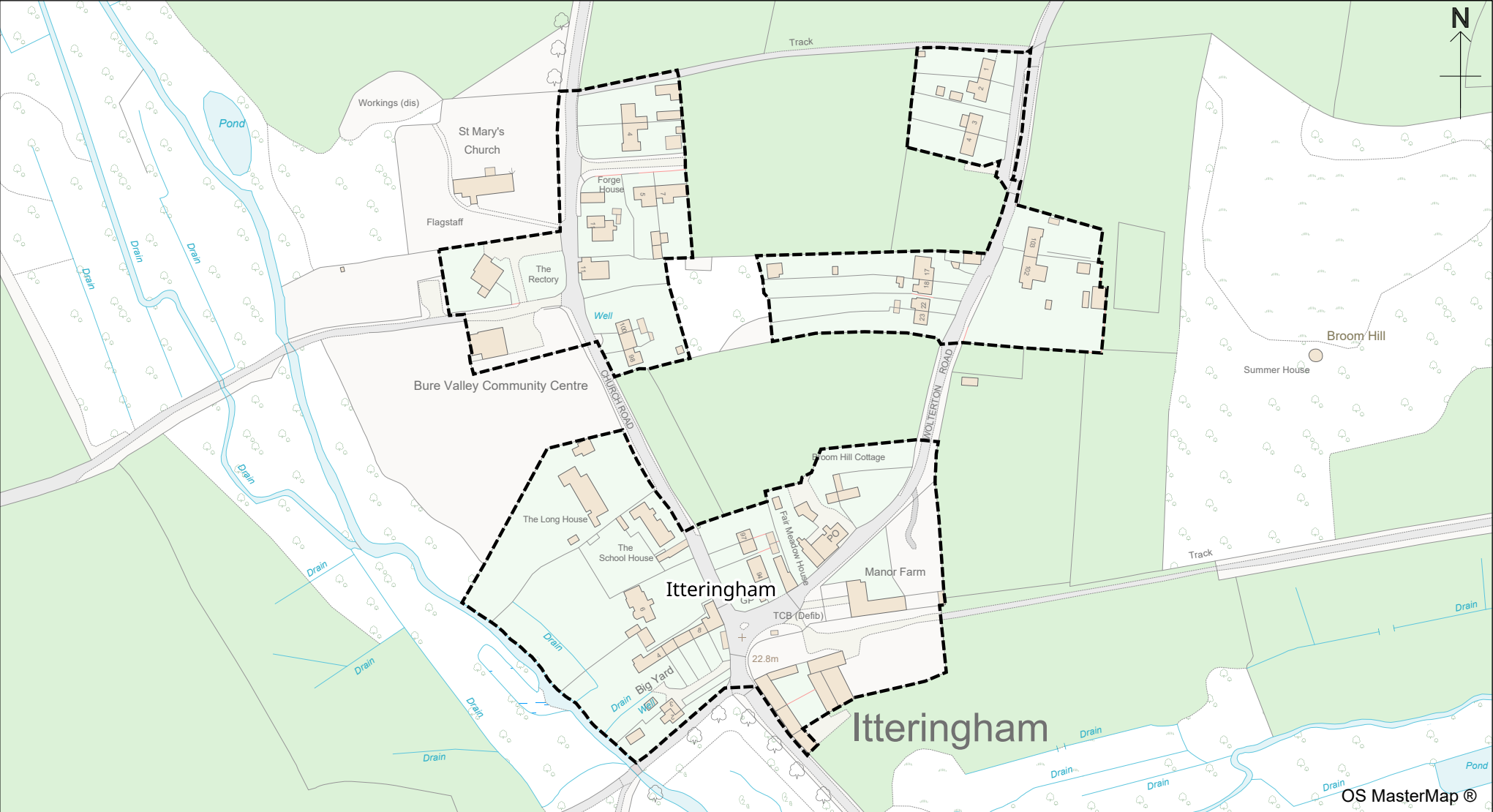
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# Settlement Boundary Review (Small Growth Villages)

## Itteringham

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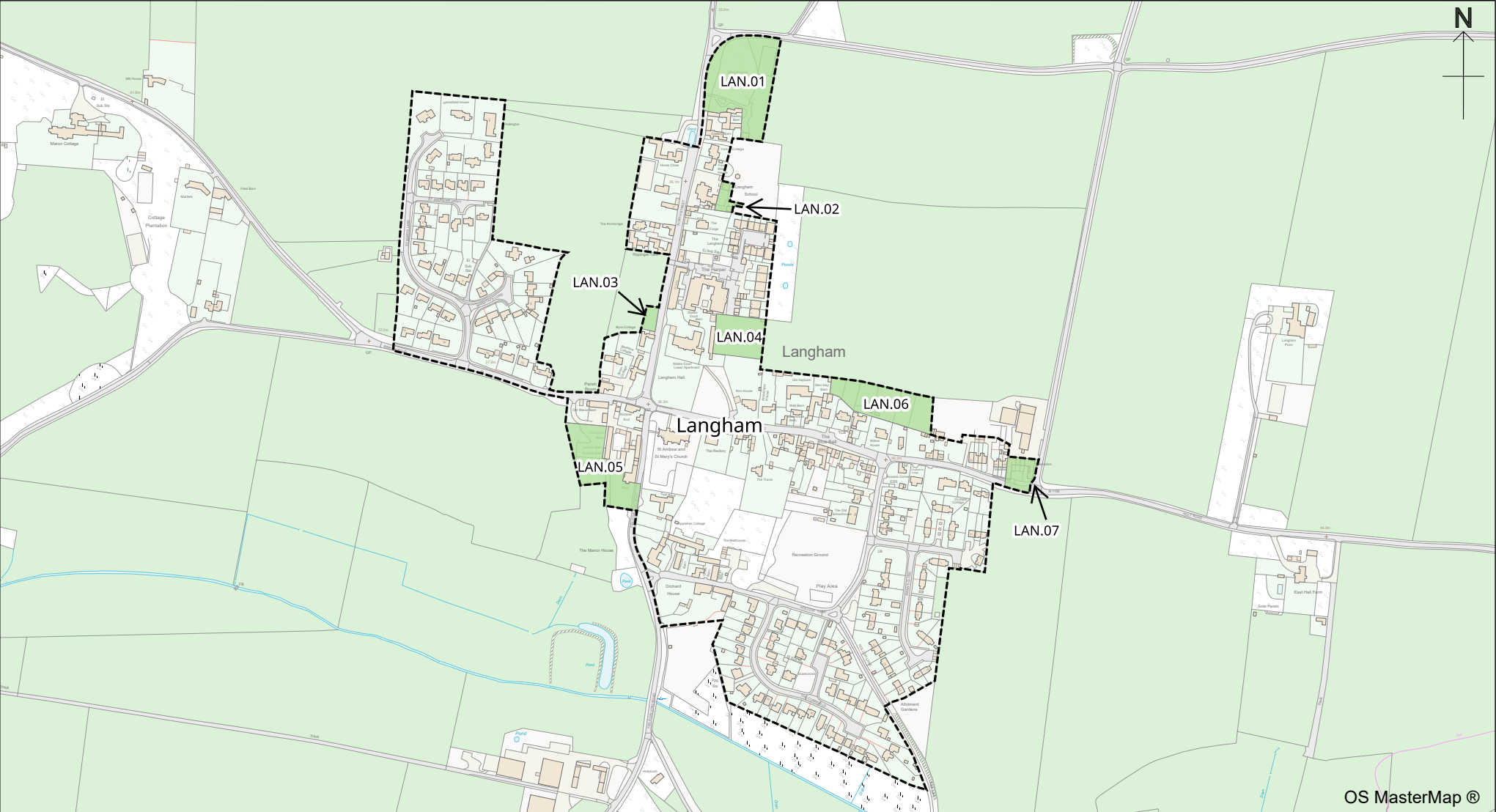
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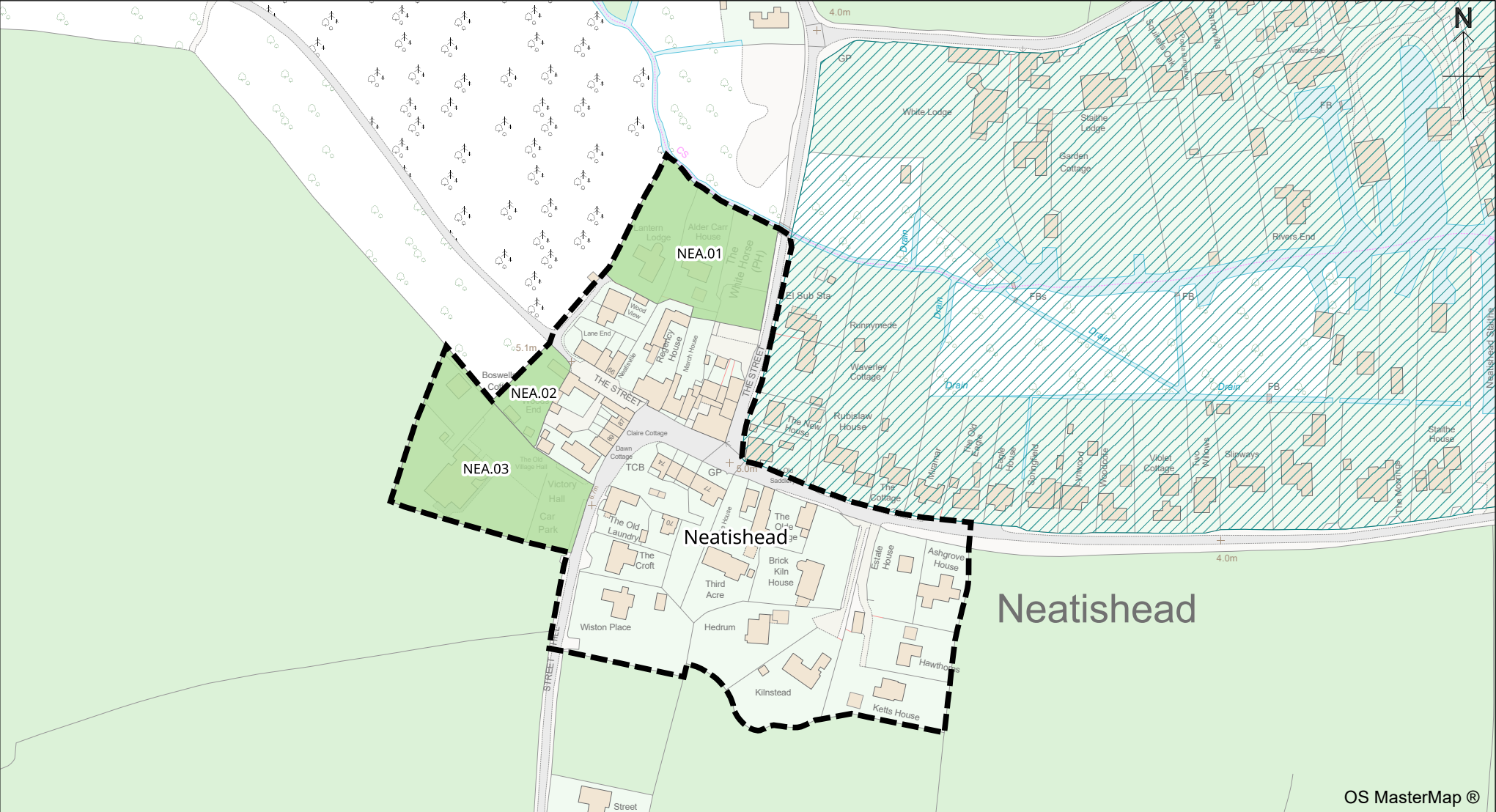
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# Settlement Boundary Review (Small Growth Villages)

## Neatishead



Proposed Addition



Proposed Deletion



Broad's Authority Executive Area



Revised Settlement Boundary

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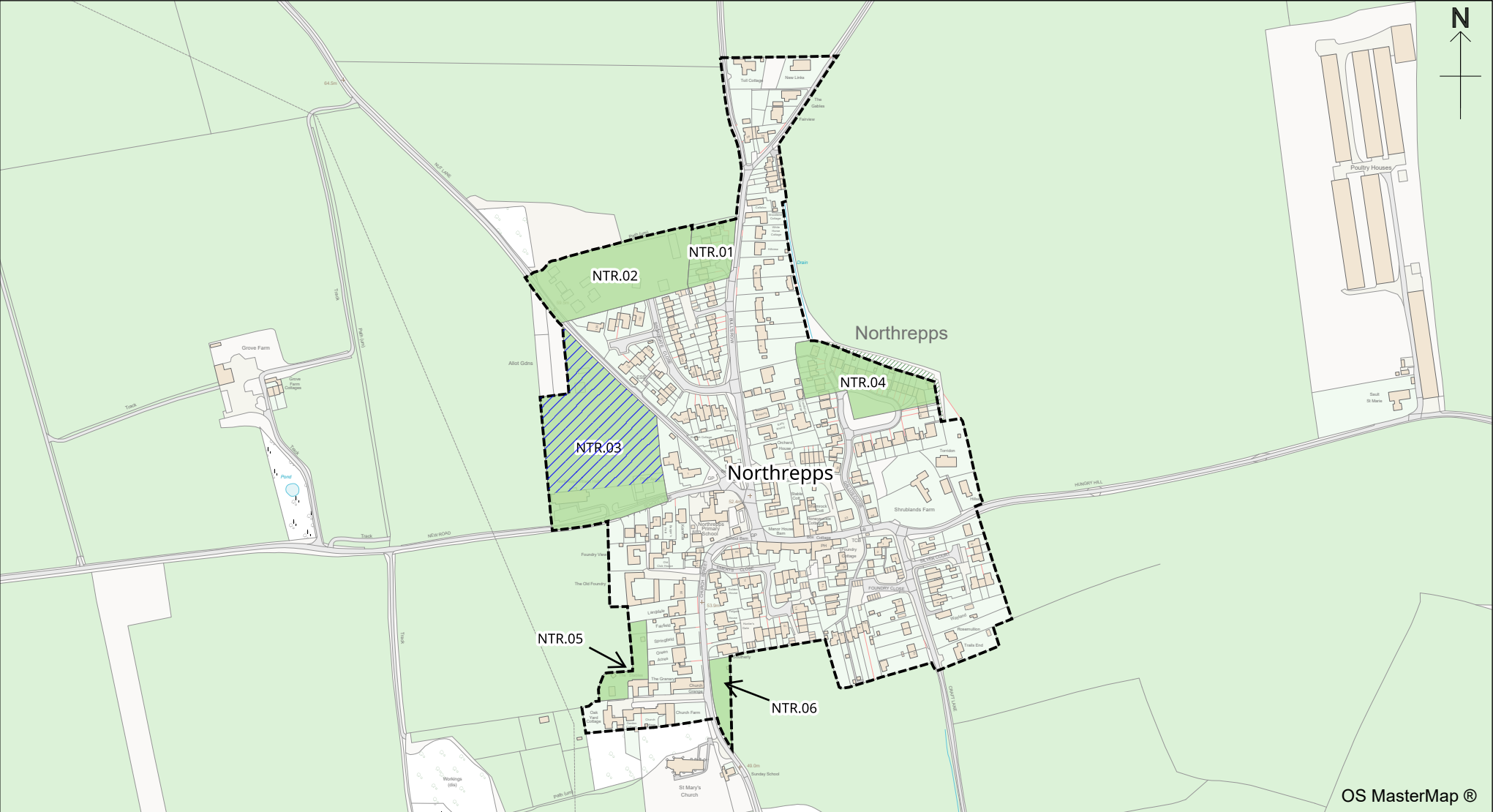
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# Settlement Boundary Review (Small Growth Villages)

## Northrepps

Proposed Addition



Proposed Education / Formal Recreation Area



Proposed Deletion



Revised Settlement Boundary

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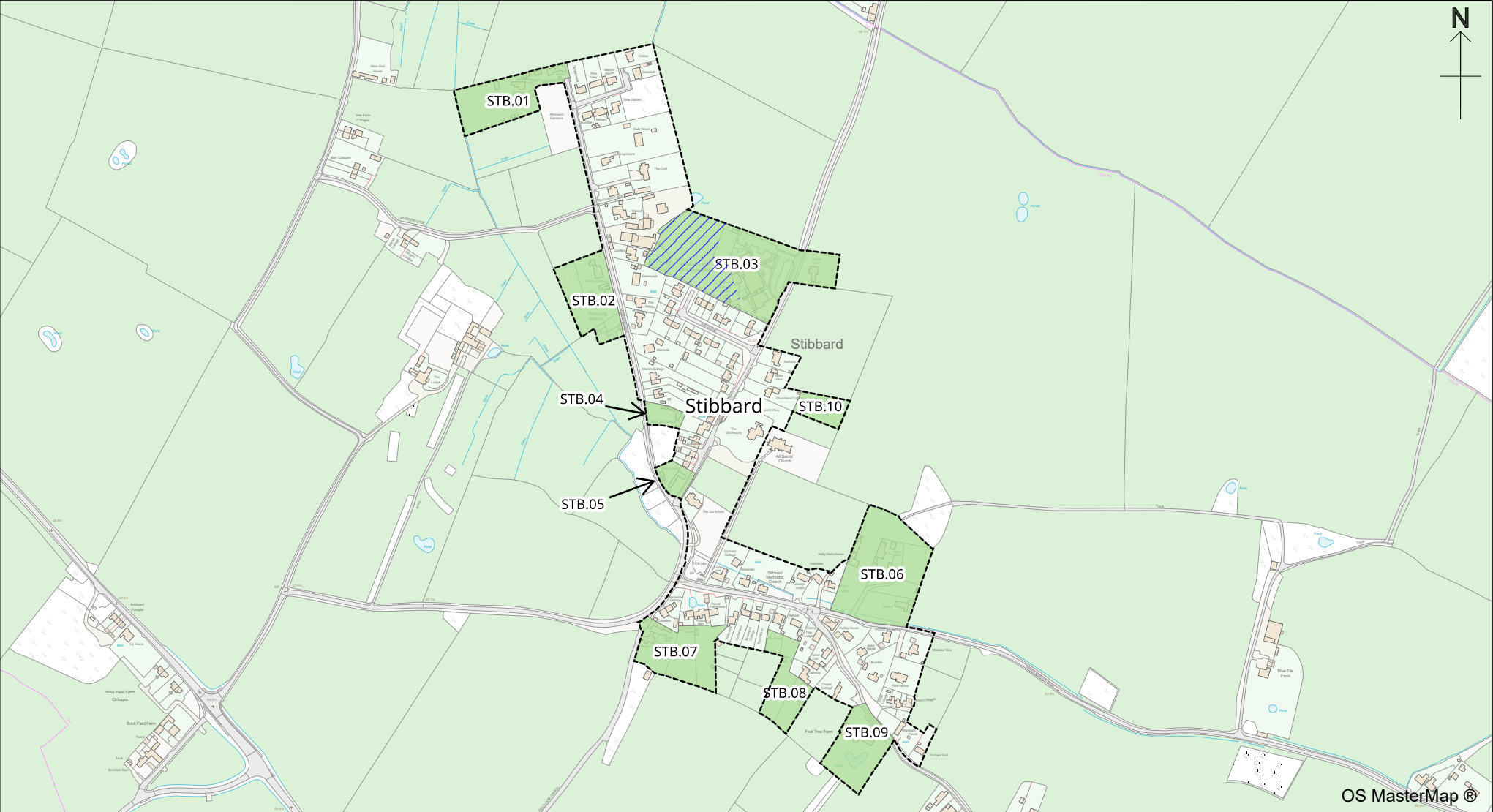
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





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**Settlement Boundary Review (Small Growth Villages)**

**Stibbard**

-  Proposed Addition
-  Proposed Education / Formal Recreation Area
-  Proposed Deletion
-  Revised Settlement Boundary

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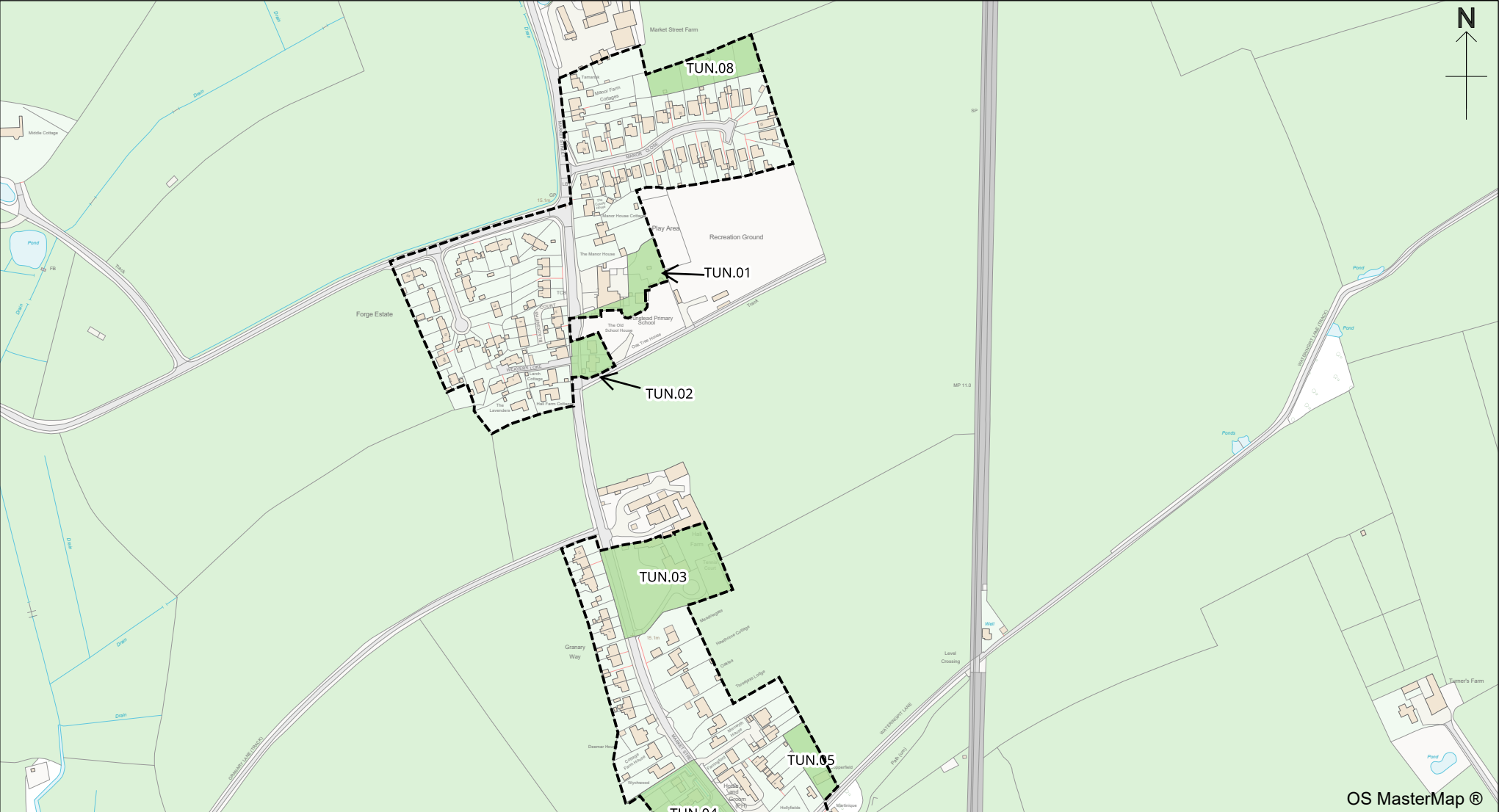
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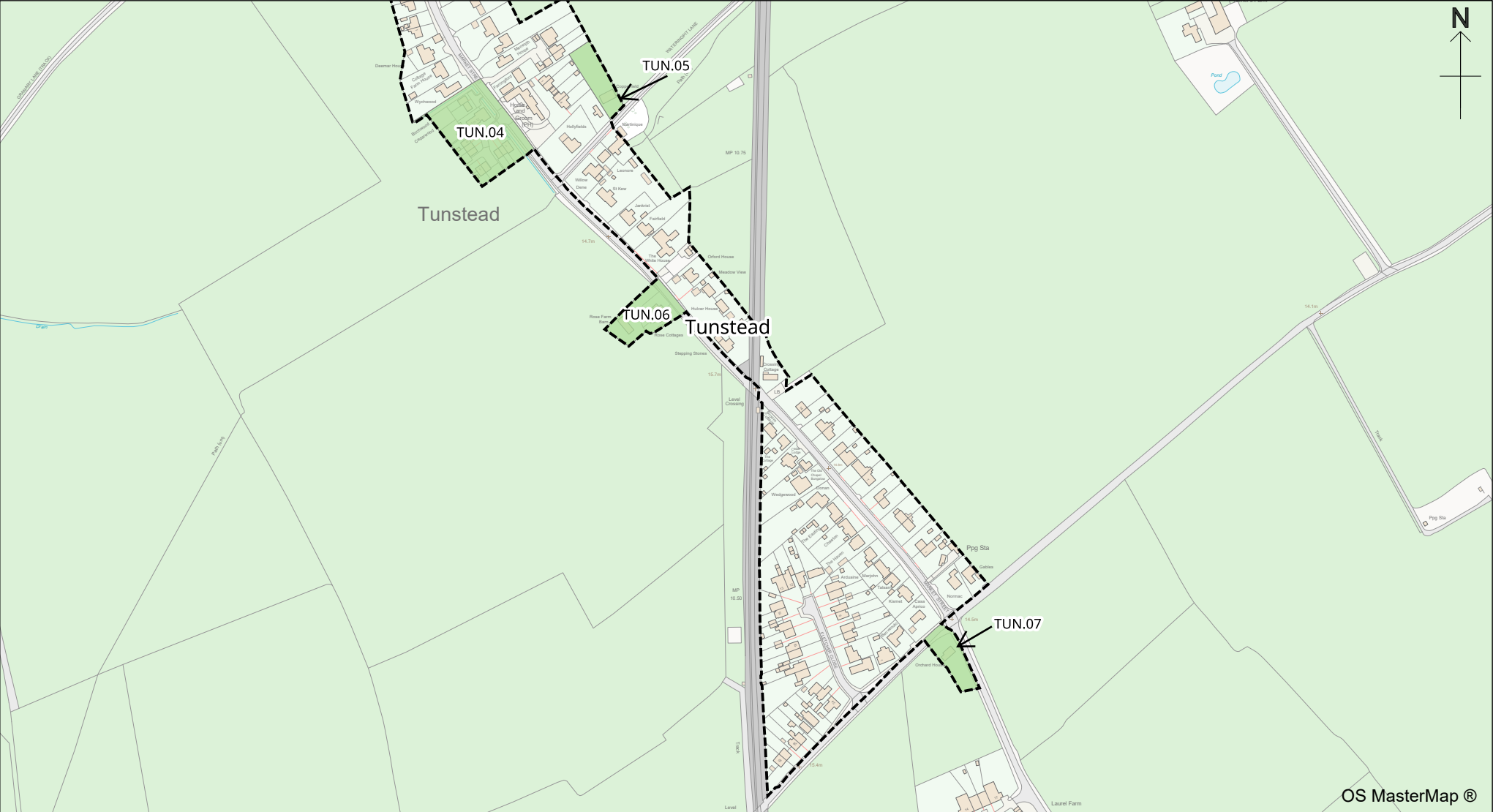
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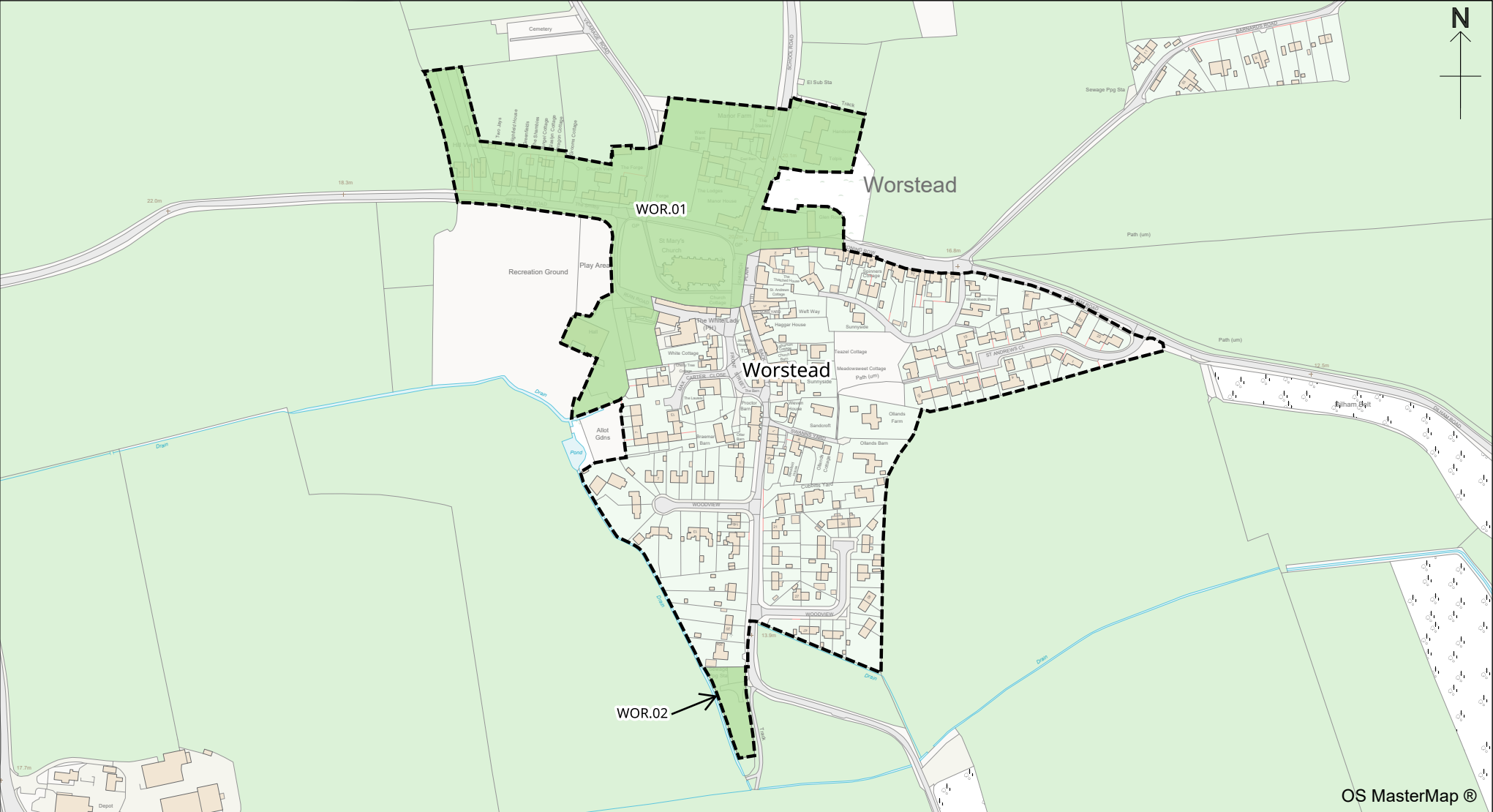
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# Settlement Boundary Review (Small Growth Villages)

## Worstead

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## **Appendix 4: Gypsy & Traveller Accommodation Needs Assessment (2024)**

# North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment

September 2024

*RRR Consultancy Ltd*



NORTH  
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# Executive Summary

## Introduction

- ES1. In 2024, North Norfolk District Council commissioned RRR Consultancy Ltd to undertake an updated Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) for the period up to 2040. The findings of this study will be used as an evidence base to support the ongoing Local Plan examination and supersedes any previous GTAA. Whilst the Submitted local plan period is 2016-36, the base date for the GTAA is September 2024 in line with the Inspectors changes to the plan period contained in his initial letter dated 24<sup>th</sup> May 2024, (released 19 July following the General Election and changed the plan period to 2024 – 2040 so that the plan remained forward looking over a 15-year period. It is important to note that this assessment includes accommodation need which may have been identified by previous GTAA's but remained unfulfilled by September 2024. Therefore, this assessment calculates needs from for the 15-year period to 2040 with the understanding that any need not addressed between the start of the plan period and September 2024 (the base date) will have been identified by this assessment.
- ES2. The requirement to assess the accommodation needs of Gypsies, Travellers, and Travelling Showpeople is established through national guidance contained in 'Planning Policy for Traveller Sites' (Department of Levelling Up, Communities and Local Government (DLUHC), December 2023). Throughout this report, this policy will be referred to as PPTS 2023 or simply PPTS unless referring to the previous PPTS.
- ES3. To achieve the study aims, the research drew on several data sources, including:
- Review of secondary information: a review of national and local planning policies, recently undertaken GTAA's, and secondary data analysis. This included an analysis of the most recently published (January 2024) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Consultation with key stakeholders, providing qualitative data regarding the accommodation needs of the different community groups.
  - Consultation with Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- ES4. The above provided an extensive range of quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.

## Policy context

- ES5. On 19 December 2023, the government announced changes to the Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of *Smith v SSLUHC & Others* (October 2022). The government intends to review this policy and case law area further in 2024. Like the 2015 update, the 2023 version will be read in conjunction with the National Planning Policy Framework.
- ES6. Whilst it is clear that the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- ES7. Given the differences in defining Gypsies and Travellers, this GTAA provides two accommodation needs figures: first, one based on the definition of ethnic identity; second, based on the definition of PPTS 2023. The two accommodation needs definitions are discussed in more detail in Chapter 2.
- ES8. In March 2016, the Department of Communities and Local Government (DCLG) published its *Review of housing needs for caravans and houseboats: draft guidance* to local housing authorities on the periodical review of housing needs for caravans and houseboats. It states that, when considering the need for caravans and houseboats, local authorities must include the needs of a variety of residents in differing circumstances, including, for example, caravan and houseboat dwelling households and households residing in bricks and mortar dwelling households.
- ES9. According to the NPPF (2023) and related planning practice guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs and address the needs of groups with specific housing requirements. The NPPF (2023) refers to the need to assess and address the accommodation needs of those covered by the definition of the PPTS 2023.

## Accommodation need

- ES10. There are 14 authorised pitches in the study area and 2 on unauthorised developments. There are also two transit pitches (owned by the local authority). There are no known Travelling Showpeople plots/ yards within North Norfolk.
- ES11. Table ES1 summarises permanent accommodation needs over the period 2024-2040. It is important to note that the figures shown in Table ES1 include all needs as of 2024,

including any which may have been identified by previous GTAA's but remained unfulfilled by the time of this assessment. The table shows that 11 new permanent Gypsy and Traveller pitches (based on the ethnic identity definition) and 9 new permanent pitches (based on PPTS 2023) are needed over the period 2024-2040 in the study area. Although the surveys undertaken with Gypsy and Traveller households asked about the preferred location of any new provision, respondents did not state any preference. They were more likely to state that they would prefer to remain close to family members already residing in the study area. Looking at the distances involved across the study area, anywhere within the study area.

**Table ES.1: Gypsy and Traveller permanent accommodation needs**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

ES12. There are currently two pending applications – one for 3 pitches and another for 2 pitches. These will address 4 identified needs for the first five years and 1 for the second five-year period. Additionally, there is a site with the potential to intensify by 1 pitch. As a result, the need for pitches under the PPTS definition for the first five years will be fully met, leaving 2 pitches outstanding under the 'ethnic' category. These remaining needs can be best addressed through windfall applications, in accordance with the submitted policy approach HOU5 resulting in a revised assessment of need as follows:

**Table ES.2: Indicative future Gypsy and Traveller permanent accommodation needs (assuming approval of the two pending applications)**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	1	0
2029-2034	2	1
2034-2040	2	2
Total	5	3

Source: GTAA 2024

ES13. In relation to transit provision, in addition to existing transit provision, this GTAA also recommends that the local authority adopt a negotiated stopping policy at the corporate level. This involves caravans being sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The advantages of this approach are set out in detail in Chapter 5.

## Conclusions and recommendations

- ES14. The results from this assessment supersede any previous GTAA (including any accommodation need calculated prior to this assessment) for the local planning authorities. This assessment identifies that there is an overall accommodation need in the study area for the local plan period for 11 additional pitches (ethnic definition) and 9 pitches (PPTS 2023). There is no identified additional accommodation need for Travelling Showpeople.
- ES15. It is recommended that the authority adopts a negotiated stopping policy at the corporate level to provide for any additional capacity.
- ES16. This GTAA recommends that North Norfolk, in their local plan, adopt the 'ethnic' definition of accommodation needs figures, i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation needs of all Gypsies and Travellers but also how the accommodation needs concerning households not meeting the PPTS definition are being addressed. Since the Lisa Smith case (2022), there has been a greater emphasis on Gypsy and Travellers' ethnic identity than their travelling patterns (past or present).
- ES17. Alternatively, the local authority may adopt the 'PPTS 2023 definition accommodation needs figures, with the difference between the PPTS 2023 figures and 'Ethnic' definition being an additional need that the council(s) may choose to meet. This means that the local authority would first meet the need of 9 (5 within the first five years) as the obligation but accept the need of a further 2 (2 within the first five years) as a potential need if further applications are brought forward through windfalls.
- ES18. In addition to the identified need there may also be an additional element of unidentified need from households residing on unauthorised developments, unauthorised encampments, new households due to in-migration, and those residing in bricks and mortar accommodation who have not identified themselves as ethnic. It is recommended that a flexible policy criteria approach such as in the submitted Plan policy HOU5 is sufficient.
- ES19. In addition to the above, to meet the specific accommodation needs of the different community groups, the report recommends the following:
- Regarding the different community groups, it is recommended that the local authority continue to work closely with the families to determine how their accommodation needs can best be met.

- Also, for the local authority to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation needs.

ES20. It is recommended that the local authority reviews the planning status of any unauthorised developments and encourage appropriate applications.

ES21. As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

- How the accommodation needs can be met through expansion of existing sites and new sites /yards.
- The delivery mechanisms such as being open to the development of sites on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use.
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the different community groups.
- Prior to action being taken against sites or yards being used without planning permission, the local authority, in partnership with landowners, occupants and relevant agencies (e.g. National Federation of Gypsy Liaison Groups and Showmen's Guild (local and national)), to review its current, historic and potential planning status, and review the most effective way forward.
- Implement a corporate policy providing negotiated stopping arrangements at agreed-upon locations to address unauthorised encampments for set periods of time.
- To liaise with owners of the sites to determine how they could expand the number of pitches to meet the family's accommodation needs when arise .
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change rapidly. As such, in line with Plan review requirements it is recommended that their accommodation needs should be reviewed every 5 to 7 years.
- Housing organisations need to consider allocating culturally appropriate housing to Gypsies and Travellers residing in bricks and mortar, for example, with sufficient space to accommodate a caravan.
- Develop a holistic vision for their work with the different community groups and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to understand further issues relating to the Gypsy and Traveller, and Showpeople communities.

- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies about Gypsy, Traveller and Showpeople communities.
- The population size and demographics of the Gypsy, Traveller and Showpeople communities can change. Their accommodation needs should be reviewed every 5 to 7 years.

# 1. Introduction

## Study context

- 1.1 In 2024, North Norfolk District Council commissioned RRR Consultancy Ltd to undertake an updated Gypsy, Traveller and Travelling Showpeople Assessment (GTAA) for the period up to 2040. The findings of this study will be used as an evidence base to support the ongoing Local Plan examination and supersedes any previous GTAA. Whilst the Submitted local plan period is 2016-36, the base date for the GTAA is September 2024 in line with the Inspectors changes to the plan period contained in his initial letter dated 24<sup>th</sup> May 2024, (released 19 July following the General Election and changed the plan period to 2024 – 2040 so that the plan remained forward looking over a 15-year period. It is important to note that this assessment includes accommodation need which may have been identified by previous GTAA's but remained unfulfilled by September 2024. Therefore, this assessment calculates needs from for the 15-year period to 2040 with the understanding that any need not addressed between the start of the plan period-and September 2024 (the base date) will have been identified by this assessment.
- 1.2 The requirement to assess the accommodation needs of Gypsies, Travellers, and Travelling Showpeople is established through national guidance contained in the 'Planning Policy for Traveller Sites' (Department for Levelling Up, Housing and Communities (DLUHC), December 2023). Throughout this report, this policy will be referred to as PPTS 2023 or simply PPTS, unless referring to PPTS 2015.

## Methodological context

- 1.3 To achieve the study aims, the research drew on several data sources including:
- Review of secondary information: a review of national and local planning policies, recently undertaken GTAA's, and secondary data analysis. This included an analysis of the most recently published (January 2024) Department for Levelling Up, Housing and Communities (DLUHC) Traveller Caravan Count to determine trends in the population of Gypsies and Travellers.
  - Consultation with key stakeholders, providing qualitative data regarding the accommodation needs of the different community groups.
  - Consultation with Gypsies and Travellers, covering a range of issues related to accommodation and service needs.
- 1.4 The above provided extensive quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.



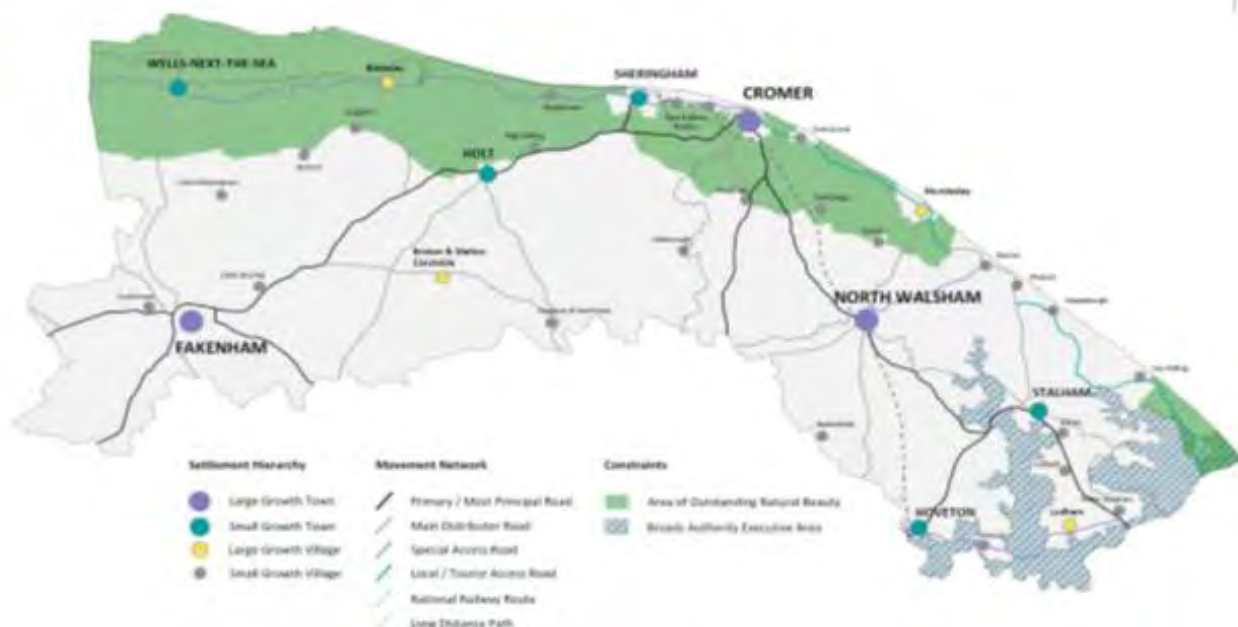
## Geographical context

- 1.5 The estimated population of the North Norfolk is 103,200 people (ONS 2021). The North Norfolk District is a large rural area of some 87,040 hectares (excluding the Broads Authority Area) with approximately 43 miles of coastline situated on the northern periphery of the East of England region. The District is one of the most rural in lowland England, with the larger settlements distributed more or less evenly across the district and accommodating around half the population; the other half live in dispersed villages and hamlets throughout the rural area.
- 1.6 The nearby urban area and major economic, social and cultural centre of Norwich (Norwich Urban Area population of 213,166(7)) is situated some 22 miles to the south of Cromer and exerts a significant influence over parts of the District. The towns of Kings Lynn situated 20 miles to the west of Fakenham and Great Yarmouth situated 16 miles to the south-east of Stalham are the other principal neighbouring settlements, but their impact on the District is far more limited.
- 1.7 The main settlements in the District are its seven towns: Cromer, Fakenham, Holt, North Walsham, Sheringham, Stalham and Wells-next-the-Sea, along with Hoveton and a further four large villages; Blakeney, Briston / Melton Constable, Ludham and Mundesley. These settlements are distributed more or less evenly across the District, and accommodate around half of the population. The other half live in the large number of smaller villages, hamlets and scattered dwellings which are dispersed throughout a large rural area. Overall the District is one of the most rural in lowland England.
- 1.8 The economy of North Norfolk remains fairly narrowly based with a relatively high dependence upon employment in the agriculture, retail, public services and tourism sectors. The local economy is particularly characterised by the fact that the majority of employees (84%) work in small businesses. Whilst there has been a change in the business base of the manufacturing sector with business closures / rationalisations in the food processing and engineering sectors in recent years, there has been a growth in employment in the manufacture of plastic and timber products and marine engineering / boat-building, which continue to perform strongly.
- 1.9 Significant numbers of employees in the District are engaged in the provision of education, health and social care, public administration, retailing and tourism. In recent years the tourism sector has enjoyed growth through investment in quality accommodation and attractions, and a move to year-round operations capturing short breaks and specialist markets, in addition to the traditional summer holiday.
- 1.10 Whilst most of North Norfolk's towns have small industrial estates, the main concentration of manufacturing employment is in Fakenham and North Walsham. Cromer, Mundesley, Sheringham and Wells-next-the-Sea are traditional destination resorts, and Hoveton acts as an important centre for Broads-based tourism.

## Map of the study area

1.11 A map of the study area is shown in Figure 1.1 below.

**Figure 1.1: Study area**



Source: Submitted version North Norfolk Local Plan 2016-2036, January 2022, p.14

## Summary

- 1.12 The purpose of this assessment is to quantify the accommodation needs of Gypsies, Travellers, and Travelling Showpeople in North Norfolk between 2024 to 2040. This is in terms of permanent pitches, sites, and transit sites and/or negotiated stopping arrangements for Gypsies and Travellers. This report will form part of the evidence base for the Local Plan review.
- 1.13 To achieve the study aims, this report focusses on the assessment of accommodation need for Gypsies and Travellers and Travelling Showpeople. The research provides a range of quantitative and qualitative data, enabling a robust and reliable assessment of accommodation needs.

## 2. Policy context

### Introduction

- 2.1 To assess the current policy context, existing documents have been examined to determine what reference is made to Gypsy, Traveller, and Travelling Showpeople issues.
- 2.2 The intention is to summarise key national and local policies and examine the findings of GTAAs recently undertaken by neighbouring authorities. Furthermore, understanding the current position will be important in the development of future strategies intended to meet accommodation needs and housing-related support needed among Gypsies and Travellers and Travelling Showpeople.

### National policies

#### *National Planning Policy Framework (December 2023)*

- 2.3 According to NPPF (2023) and related planning practice guidance, a sound local plan seeks, as a minimum, to meet the area's objectively assessed needs and address "the needs of groups with specific housing requirements. The NPPF (2023) refers to the need to both assess and then address the accommodation needs of those who are covered by the definition of the PPTS 2023. The Human Rights Act 1998 and Equality Act 2010 protect Gypsies and Travellers' cultural and ethnic way of life, including living in a caravan. This GTAA considers the accommodation needs of Gypsies and Travellers who identify as such, irrespective as to whether they have permanently or temporarily ceased to travel (i.e. those who meet the 'ethnic' definition), as well as those who meet the PPTS 2023 definition.

### Definition context

- 2.4 On 19 December 2023, the government announced changes to Planning Policy for Traveller Sites (PPTS), which had previously been updated in August 2015. The key difference between the PPTS published in August 2015 and the December 2023 version primarily involves changes made in response to a recent legal judgment and ongoing policy reviews.
- 2.5 In the 2023 update, the government has reverted to the definition of Gypsies and Travellers used in the PPTS as adopted in 2012. This change is in response to a Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022). The government intends to review this area of policy and case law further in 2024.

- 2.6 The 2015 update involved changes to PPTS that were based on policies contained within the government response to a consultation on planning and travellers. Like the 2023 update, the 2015 version was to be read in conjunction with the National Planning Policy Framework.
- 2.7 The key difference between PPTS 2015 and 2023 is that the former removed the word 'permanent' from the planning definition of Gypsies and Travellers. This meant that local planning authorities were not obliged to consider the accommodation needs of Gypsy and Traveller households who had permanently ceased to travel:

### PPTS 2015:

For the purposes of this planning policy, "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' **educational or health needs or old age have ceased to travel temporarily**, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. (our emphasis)

- 2.8 However, the Court of Appeal judgment in the case of Smith v SSLUHC & Others (October 2022) determined that PPTS was discriminatory by excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. In response, the government amended the definition by reinserting the word 'permanent':

### PPTS 2023<sup>1</sup>:

For the purposes of this planning policy, "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' **educational or health needs or old age have ceased to travel temporarily or permanently**, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. (our emphasis)

- 2.9 The DLUHC definition of Travelling Showpeople is:

*Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age*

<sup>1</sup> MHCLG, 'Planning Policy for Traveller Sites' December 2023 at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites>

*have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above.*

- 2.10 Unlike Gypsies and Travellers, Travelling Showpeople are not considered to be an ethnic minority by the Equality Act 2010 (and previously the Race Relations Act 1976). Although some Gypsies and Travellers may earn a living as 'travelling showpeople', Travelling Showpeople as a group do not consider themselves to belong to an ethnic minority<sup>2</sup>.
- 2.11 For the purposes of this planning policy, "Travellers" means "Gypsies and Travellers" and "Travelling Showpeople" as defined above from PPTS annex 1. Also, for the purposes of Gypsy and Traveller Accommodation Assessments (GTAA's), Travelling Showpeople are included under the definition of 'Gypsies and Travellers' in accordance with The Housing (Assessment of Accommodation Needs) (Meaning of Gypsies and Travellers) (England) Regulations 2006, and the Review of housing needs for caravans and houseboats: draft guidance to local housing authorities on the periodical review of housing needs (March 2016). It recommends that Travelling Showpeople's own accommodation needs and requirements should be separately identified in the GTAA. This GTAA adheres to the definition of Gypsies, Travellers and Travelling Showpeople as defined by the DCLG 'Planning Policy for Traveller Sites' (December 2023) (see above).
- 2.12 It is important to note that Gypsies and Travellers and Travelling Showpeople have separate accommodation needs and requirements. Different terminology is used to distinguish between Gypsy and Traveller accommodation and Travelling Showpeople. Gypsies and Travellers occupy pitches on sites, while Travelling Showpeople occupy plots on yards. In addition to space for residing quarters, Travelling Showpeople also require additional space in order to store and maintain large equipment.
- 2.13 The 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age have ceased to travel; it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes. Also, the 2023 PPTS does not require the need to assess the accommodation needs of Gypsy and Traveller households who have ceased to travel temporarily or permanently but *not* due to education or health needs or old age. Ethnic need is based on all households who identify as Gypsies and Travellers (as protected by the Equality Act 2010) irrespective as to whether they travel or not.

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<sup>2</sup> DCLG, *Consultation on revised planning guidance in relation to Travelling Showpeople*, January 2007, p. 8

- 2.14 Whilst the 2023 PPTS determines the need to assess the accommodation needs of households who have ceased to travel temporarily or permanently due to their family's or dependants' educational or health needs or old age, it does not explicitly state how the new definition should be interpreted in relation to other factors such as whether families travel for economic or work purposes.
- 2.15 One interpretation is that 'a nomadic habit of life' means travelling for an economic purpose. Previous case law e.g. *R v Shropshire CC ex p Bungay* (1990) and *Hearne v National Assembly for Wales* (1999) has been used to support this point. There is nothing within PPTS 2015 which indicates that Gypsy or Traveller status (for planning purposes) is solely derived from whether there is any employment-related travelling.
- 2.16 More recent Planning Inspectors' reports have reached differing conclusions regarding whether the Gypsy and Traveller status (for planning purposes) should be based on patterns of employment-related nomadism. For example, a 2016 planning appeal decision regarding a site at Throcking, Hertfordshire, concluded the appellant was not a Gypsy and Traveller for planning purposes as there was insufficient evidence "that he is currently a person of a nomadic habit of life"<sup>3</sup> for employment purposes (i.e. he did not meet the August 2015 PPTS definition).
- 2.17 In contrast, some other Planning Inspectors' reports have appeared to give less weight to the travelling status of Gypsies and Travellers. For example, an appeal decision regarding a site in Blythburgh, Suffolk, states that whilst the appellant had permanently ceased to travel, he is nonetheless an ethnic Romany gypsy with protected characteristics under the Equality Act 2010<sup>4</sup>.
- 2.18 Similarly, a local authority rejected a planning application as it determined that the household did not meet the PPTS 2015 definition. However, despite evidence that the family had reduced the extent to which they travel due to educational requirements, the Planning Inspector allowed the s78 appeal on the basis that they should be regarded as Gypsies for planning purposes<sup>5</sup>. Also, in deciding whether to allow an S78 appeal for a site in West Kingsdown, Kent, the Planning Inspector acknowledged that the local authority included within its future calculations the accommodation needs (in terms of pitches) of 'cultural' Gypsies and Travellers<sup>6</sup>.
- 2.19 Much case law precedes the December 2023 definition and even the 2015 definition. The commonly cited *R v South Hams DC ex parte Gibb et al.* judicial decision was

<sup>3</sup> Appeal Ref: APP/J1915/W/16/3145267 Elmfield Stables, Thirty Acre Farm, Broadfield, Throcking, Hertfordshire SG9 9RD, 6 December 2016.

<sup>4</sup> Appeal Ref: APP/J3530/A/14/2225118, Pine Lodge, Hazels Lane, Hinton, Blythburgh, Suffolk IP17 3RF 1 March 2016.

<sup>5</sup> Appeal Ref: APP/U2235/W/18/3198435 Ten Acre Farm, Love Lane, Headcorn TN27 9HL 9 May 2019.

<sup>6</sup> Appeal Ref: APP/G2245/W/17/3170535 Land north-west of Eagles Farm, Crowhurst Lane, West Kingsdown, Kent TN15 6JE 27 November 2018.

undertaken in response to the now partly repealed Caravan Sites Act 1968. Also, it is increasingly recognised that defining Gypsies and Travellers in terms of employment status may contravene human rights legislation. For example, in 2003, the Welsh Assembly's Equality of Opportunity Committee noted the following:

‘...apparent obsession with finding ways to prove that an individual is not a 'Gypsy' for the purposes of the planning system. This approach is extremely unhelpful...and there can be no doubt that actual mobility at any given time is a poor indicator as to whether someone should be considered a Gypsy or a Traveller’<sup>7</sup>.

- 2.20 In September 2019, the Equality and Human Rights Commission published research into the impact of the PPTS 2015 definition on assessing accommodation needs<sup>8</sup>. The research examined a sample of 20 GTAAAs undertaken since the August 2015 revised definition. The report found that there had been a 73% reduction in accommodation needs in post-2015 GTAAAs compared to pre-2015 GTAAAs undertaken by the same local planning authorities.
- 2.21 Importantly, on 31 October 2022, the Court of Appeal determined that PPTS 2015 was discriminatory in relation to excluding households who had permanently ceased to travel from being recognised (for planning purposes) as Gypsies and Travellers. The case relates to Lisa Smith, who resides on a site occupied by Ms Smith, her husband, their children and grandchildren. Two of Ms Smith's adult sons are severely disabled and cannot travel for work. The judgment determined that PPTS 2015 characterises nomadic Gypsies and Travellers as different from Gypsies and Travellers who, as a result of age or disability, are no longer able to travel. This creates sub-classes of ethnicity which ‘seems to sit uneasily with the stated aim of PPTS 2015 to facilitate the “traditional” way of life” of Gypsies and Travellers, and not simply the “nomadic” way of life’. The judgement concluded that the objective of PPTS 2015 in excluding households from being defined as Gypsies and Travellers was not ‘fairness’.
- 2.22 Given the above, our approach is to use a methodology that provides an accommodation need figure based on ethnic identity and, second, a figure based on the PPTS (2023). Providing two accommodation needs figures – one based on the PPTS 2023 and another using a cultural definition, assessing accommodation needs regardless of whether they travel or not – complies with both PPTS 2023 and the Equality Act 2010. This approach acknowledges the distinctions between planning definitions under PPTS 2023 and broader cultural identities, ensuring that all relevant

<sup>7</sup> Welsh Assembly 2003 cited in Johnson, Murdoch and Willers, *The Law Relating to Gypsies and Travellers*, no date).

<sup>8</sup> Equality and Human Rights Commission, *Gypsy and Traveller sites: the revised planning definition's impact on assessing accommodation needs*, Research Report 128, September 2019 located at: [https://www.equalityhumanrights.com/sites/default/files/190909\\_gypsy\\_and\\_traveller\\_sites\\_-\\_impact\\_of\\_the\\_revised\\_definition\\_-\\_final.pdf](https://www.equalityhumanrights.com/sites/default/files/190909_gypsy_and_traveller_sites_-_impact_of_the_revised_definition_-_final.pdf)



accommodation needs are considered, thereby aligning with legal obligations under the Equality Act to avoid discrimination and promote equality.

- 2.23 Different GTAA's reach differing conclusions on which approach/definition to adopt, and local authorities decide individually which approach to take for planning purposes. It is recommended that this be kept under review in light of evolving appeal decisions and case law. This GTAA recommends adopting the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed. An alternative is the adoption of the PPTS figure and for the difference between the PPTS and ethnic based need to be covered by a criteria-based policy.

***DCLG Review of housing needs for caravans and houseboats: draft guidance (March 2016)<sup>9</sup>***

- 2.24 The 2016 DCLG draft guidance to local housing authorities on the periodical review of housing needs for caravans and houseboats states that when considering the need for caravans and houseboats local authorities should include the needs of a variety of residents in differing circumstances, for example:
- Caravan and houseboat dwelling households:
    - who have no authorised site anywhere on which to reside
    - whose existing site accommodation is overcrowded<sup>10</sup> or unsuitable, but who are unable to obtain larger or more suitable accommodation
    - who contain suppressed households who are unable to set up separate family units and
    - who are unable to access a place on an authorised site, or obtain or afford land to develop on.
  - Bricks and mortar dwelling households:
    - Whose existing accommodation is overcrowded or unsuitable ('unsuitable' in this context can include unsuitability by virtue of a person's cultural preference not to live in bricks-and-mortar accommodation).

<sup>9</sup> See <https://www.gov.uk/government/publications/review-of-housing-needs-for-caravans-and-houseboats-draft-guidance>

<sup>10</sup> Overcrowding e.g. where family numbers have grown to the extent that there is now insufficient space for the family within its caravan accommodation and insufficient space on the pitch or site for a further caravan (DCLG 2007 p.25)

- 2.25 Importantly, with respect to this report, the draft guidance states that assessments should include, but are not limited to, Romany Gypsies, Irish and Scottish Travellers, New Age Travellers, and Travelling Showpeople.
- 2.26 The guidance recognises that the needs of those residing in caravans and houseboats may differ from the rest of the population because of:
- their nomadic or semi-nomadic pattern of life
  - their preference for caravan and houseboat-dwelling
  - movement between bricks-and-mortar housing and caravans or houseboats
  - their presence on unauthorised encampments or developments.
- 2.27 Also, it suggests that as mobility between areas may have implications for carrying out an assessment, local authorities should consider the following:
- co-operating across boundaries both in carrying out assessments and delivering solutions
  - the timing of the accommodation needs assessment
  - different data sources.
- 2.28 Finally, the DCLG draft guidance (2016) states that, in relation to Travelling Showpeople, account should be taken of the need for storage and maintenance of equipment as well as accommodation and that the transient nature of many Travelling Showpeople should be considered.

### *Housing and Planning Act 2016*

- 2.29 The Housing and Planning Act 2016, which gained Royal Assent on 12 May 2016, omits sections 225 and 226 of the Housing Act 2004, which previously identified ‘gypsies and travellers’ as requiring specific assessment for their accommodation needs when carrying out reviews of housing needs. Instead, the Act amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in or resorting to the study area in caravans or houseboats. However, for planning purposes, the DCLG ‘Planning Policy for Traveller Sites’ (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.30 The Housing and Planning Act 2016 requires Local Housing Authorities (LHAs) to consider the needs of people residing in places on inland waterways where houseboats can be moored. The term ‘houseboat’ is not defined by DCLG guidance. As such, the GTAA adopts the National Bargee Travellers Association’s (NBTA) definition, who define a boat dweller as:

“Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932”.

## Local Planning Policies

### *Submitted North Norfolk Local Plan*

2.31 Policy HOU 5 ('Gypsy, Traveller & Travelling Showpeople's Accommodation') of the North Norfolk Local Plan<sup>11</sup> states that development that meets the identified needs of Gypsies and Travellers and of Travelling Showpeople will be permitted provided that it is of an appropriate scale and nature and that it complies with all of the following criteria:

- a) the intended occupants meet the definition of Gypsies and Travellers, or the description of Travelling Showpeople;
- b) development minimises impact on the surrounding landscape;
- c) safe vehicular access to the public highway can be provided and the development can be served by necessary utilities infrastructure;
- d) the movement of vehicles to and from the site will not result in any unacceptable impact on the capacity of the highway network;
- e) there is adequate space for parking, turning and servicing on site;
- f) the site is in a sustainable location on the outskirts of, or within a reasonable distance of, a settlement which offers local services and community facilities;
- g) suitable landscaping, boundary enclosures and screening are provided to give privacy, minimise impact on the character and amenities of the surrounding area and neighbouring settled community;
- h) proposals should include any additional uses intended to be carried out from the site.

2.32 It also states that Conditions will be used to control the nature and level of non-residential uses on the site<sup>12</sup>. It is understood at the time of writing that following the earlier hearing sessions there are no proposed modifications at this time

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<sup>11</sup> North Norfolk Local Plan Proposed submission version publication stage regulation 19 January-2022.

<sup>12</sup> North Norfolk Local Plan Proposed submission version publication stage regulation 19 January-2022 p.123.

## **Duty to cooperate and cross-border issues**

- 2.33 The duty to cooperate was created in the Localism Act 2011. It places a legal duty on local planning authorities, county councils in England, and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation relating to strategic cross boundary matters. Also, the need for councils to cooperate reflects the characteristic that Gypsy and Traveller travelling patterns transcend local authority borders<sup>13</sup>.
- 2.34 Local authorities are required to work together to prepare and maintain an up-to-date understanding of the likely permanent and transit accommodation needs for their areas. They should also consider the production of joint development plans to provide more flexibility in identifying sites, particularly if a local planning authority has specific development constraints across its area.
- 2.35 As part of this assessment, consultation in relation to Gypsies, Travellers and Travelling Showpeople and boat dwellers, was undertaken with adjoining planning and housing authorities. The findings from the consultation are discussed in Chapter 4.
- 2.36 Given the transient nature of Gypsies and Travellers it is important for the GTAA to consider Gypsy and Traveller accommodation need in neighbouring authorities. The following section summarises the results of GTAAs recently undertaken by both the local authority which has commissioned this assessment, and neighbouring or nearby local authorities, specifically in relation to accommodation needs and travelling patterns (see Figure 1.1 'Study Area Map' above for authorities bordering the study area).

### ***Breckland GTAA 2024***

- 2.37 The GTAA was undertaken by RRR Consultancy on behalf of the Breckland Council. The overall accommodation need in the study area for the local plan period (2024-2046) for 71 additional pitches (ethnic definition), and 66 pitches (PPTS 2023). The ethnic need includes the 66 who meet the PPTS definition and the 5 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. There is no identified additional accommodation need for Travelling Showpeople.

### ***Greater Yarmouth and Broads Authority GTAA 2022***

- 2.38 The GTAA was undertaken by RRR Consultancy on behalf of the Greater Yarmouth and Broads Authority. Over the period 2022-2041, the GTAA found a need for a further 18 Gypsy and Traveller pitches (based on the ethnic identity definition), and 16 pitches

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<sup>13</sup> It should be noted that the government's white paper 'Planning for the Future' (August 2020) indicated that it intended to abolish the duty to cooperate.

(based on PPTS 2015) are needed over the 19-year period. The ethnic need includes the 16 who meet the PPTS definition and the 2 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. There are no known supply or need for plots in relation to Showpeople in the area. In relation to transit provision, it is recommended that the local authorities set up a corporate negotiated stopping places policy to address transit provision.

#### *Broads Authority BDAA 2022*

- 2.39 The BDAA was undertaken by RRR Consultancy on behalf of the Broads Authority. Over the period 2021-2041 the BDAA found that a further 48 permanent residential moorings are needed and a review of the short term moorings.

#### *Greater Norwich GTAA 2022*

- 2.40 The GTAA was undertaken by RRR Consultancy on behalf of Broadland District Council, Norwich City Council, and South Norfolk District Council. Over the period 2022-2038, the GTAA found a need for a further 50 Gypsy and Traveller pitches (based on the ethnic identity definition), and 29 pitches (based on PPTS 2015) are needed over the 16-year period. The ethnic need includes the 29 who meet the PPTS definition and the 21 who do not, whilst the PPTS needs relate only to those who meet the PPTS definition. The GTAA also identified a need for 43 additional Travelling Showpeople plots over the 16-year period. In relation to transit provision, it is recommended that the local authorities set up a corporate negotiated stopping places policy to address transit provision.

#### *Kings Lynn and West Norfolk GTAA 2023*

- 2.41 The GTAA was conducted on behalf of Kings Lynn and West Norfolk. It identified an overall accommodation need in the study area for the local plan period (2024-2046) of 102 pitches for those who meet the PPTS definition, 6 for those whose planning status is unknown, and 48 for those who do not meet the planning definition. This results in a total ethnic accommodation need of 156 pitches over the period 2023-2040. Additionally, there is a requirement for 6 more plots for Travelling Showpeople during the same period.

#### *Norfolk GTAA 2017*

- 2.42 The GTAA was undertaken by RRR Consultancy on behalf of Broadland District Council, Breckland Borough Council, North Norfolk District Council, Norwich City Council, and South Norfolk District Council), alongside the Broads Authority. Over the period 2017-2036, the GTAA found a need for 73 additional pitches for all households ethnically identified as Gypsies or Travellers, or 41 pitches based only on families who travel for work. The GTAA also found a need for 46 plots for Travelling Showpeople, 63 boat moorings, and 140 pitches for non-Gypsy and Traveller households residing permanently on residential pitches. In relation to transit provision, there is no need for provision for Travelling Showpeople. In relation to boat dwellers, it was recommended

that the 24-hour moorings be made available for longer periods of time during out-of-season periods. With regard to Gypsies and Travellers, it was recommended that each of the four authority areas implement a negotiated stopping place policy. This assessment is an update to this for The Broads Authority and Breckland Borough Council. See Greater Norwich 2022 for Broadland District Council, Norwich City Council and South Norfolk District Council. North Norfolk is updating their GTAA's (due for publication later this year).

## Summary

- 2.43 DLUHC's 'Planning Policy for Traveller Sites' (December 2023) emphasises the need for local authorities to use evidence to plan positively and manage development. The Housing and Planning Act 2016 amends section 8 of the Housing Act 1985 governing the assessment of accommodation needs to include all people residing in the study area in caravans or houseboats. However, for planning purposes, as noted above, the DCLG Planning Policy for Traveller Sites (December 2023) still requires local authorities to identify the accommodation needs of Gypsies, Travellers and Travelling Showpeople who accord with the definition in Annex 1 of the PPTS.
- 2.44 The GTAA is based on a methodology which provides, first, an accommodation need figure based on ethnic identity; and, second, a figure based on the PPTS (December 2023). Local planning policies regarding the provision of new Gypsy, Traveller and Showpeople are outlined in Policy HOU5 of the Local Plan (2022), which outlines the criteria used to determine suitable locations for new sites and yards.
- 2.45 Given the cross-boundary characteristic of Gypsy and Traveller accommodation issues, it is important to consider the findings of GTAA's produced by neighbouring local authorities. GTAA's recently undertaken by neighbouring local authorities indicate that there remain some Gypsy and Traveller accommodation needs throughout the region, but none have suggested a need arising in their area should be met within the study area.

## 3. Trends in population levels

### Introduction

- 3.1 This section examines population levels in the GTAA study area and population trends. The primary source of information for Gypsies and Travellers (including Travelling Showpeople) in England is the DLUHC Traveller Caravan Count. This was introduced in 1979 and places a duty on local authorities in England to undertake a twice-yearly count for the DLUHC on the number of Gypsy and Traveller caravans in their area. The count was intended to estimate the size of the Gypsy and Traveller population for whom provision was to be made and to monitor progress in meeting accommodation needs.
- 3.2 Although the duty to provide sites was removed in 1994, the need for local authorities to conduct the count has remained. There are, however, several weaknesses with the reliability of the data. For example, across the country, counting practices vary between local authorities, and the practice of carrying out the count on a single day ignores the fluctuating number and distribution of unauthorised encampments. Also, some authorities include Travelling Showpeople in the same figures as Gypsies and Travellers, whilst others distinguish between the different groups and do not include Travelling Showpeople.
- 3.3 Significantly, the count is only of caravans (tourer and static caravans) so Gypsies and Travellers residing in bricks and mortar accommodation are excluded. It should also be noted that pitches/households often contain more than one caravan, typically two or three.
- 3.4 Despite concerns about accuracy, the count is a useful indicator because it provides the only national source of information about the numbers and distribution of Gypsy and Traveller caravans. As such, it is useful for identifying trends in the Gypsy and Traveller population, if not determining absolute numbers.
- 3.5 The DLUHC Count includes data concerning Gypsies and Travellers sites<sup>14</sup>. It distinguishes between caravans on socially rented authorised, private authorised, and unauthorised pitches. Unauthorised sites and pitches are broken down as to whether they are tolerated or not tolerated. The analysis in this chapter includes data from July 2021 to January 2024.

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<sup>14</sup>. Data regarding Travelling Showpeople is published separately by the DLUHC as 'experimental statistics'.

## Population

- 3.6 The total Gypsy and Traveller population residing in the UK is unknown, although the government estimate there to be between 100,000 and 300,000 Gypsy and Traveller people<sup>15</sup>. There are uncertainties partly because of the number of different definitions that exist but mainly because of an almost total lack of information about the numbers of Gypsies and Travellers now residing in bricks-and-mortar accommodation. Estimates produced for the DLUHC suggest that at least 50% of the overall Gypsy and Traveller population are now residing in permanent housing.
- 3.7 Local authorities in England provide a count of Gypsy and Traveller caravans in January and July each year for the DLUHC. Due to Covid-19 restrictions, the Count did not occur in July 2020 or January 2021. The January 2024 Count (the most recent published figures) indicates 26,632 caravans. Applying an assumed three person per caravan<sup>16</sup> multiplier would give a population of 79,896 persons.
- 3.8 Again, applying an assumed multiplier of three persons per caravan and doubling this to allow for the numbers of Gypsies and Travellers in housing<sup>17</sup>, gives a total population of 159,792 persons for England. However, given the limitations of the data, this figure can only be very approximate and may be a significant underestimate.
- 3.9 The 2021 national census included the category of 'Gypsy or Irish Traveller' in the question regarding ethnic identity. Table 3.1 below shows the total population and Gypsy and Traveller population as derived from the 2021 Census. It shows that in March 2021, there were 86 Gypsies and Travellers residing in North Norfolk, representing around 0.08% of the usual resident population.<sup>18</sup> This is below both the average for the East of England (0.14%) and England & Wales (0.11%).

**Table 3.1 Gypsy and Traveller Population (2021)**

	Population (no.)	G&T Pop (no.)	G&T Pop (%)
North Norfolk	102,978	86	0.08%
East of England	6,335,075	8,974	0.14%
England	59,597,578	67,757	0.11%

Source: Census 2021 cited by NOMIS 2023

- 3.10 It is also possible to determine the Gypsy and Traveller population within the study area by tenure. Derived from 2021 Census data, Table 3.2 shows the housing type of Gypsy and Traveller households. Just under a fifth (18%) of Gypsy and Traveller

<sup>15</sup> The House of Lords 'Inequalities Faced by Gypsy, Roma and Traveller Communities' (25 February 2020) provides useful links regarding inequalities faced by the GRT community.

<sup>16</sup> Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

<sup>16</sup> Niner, Pat (2003), Local Authority Gypsy/Traveller Sites in England, ODPM.

<sup>18</sup> See ONS 2021 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>



households living in North Norfolk were recorded as residing in a caravan or other mobile home, whilst just over four fifths (82%) were recorded as residing in bricks and mortar accommodation. This compares with a third (33%) of Gypsy and Traveller households in the East of England region living in a caravan or other mobile home and a fifth (20%) in England.

**Table 3.2 Gypsy and Traveller households by tenure**

	A caravan or other mobile		Bricks and mortar		Total	
	No.	%	No	%	No	%
North Norfolk	5	18%	23	82%	28	100%
East England	137	33%	284	67%	421	100%
England	4,598	20%	17868	80%	22,466	100%

Source: Census 2021 cited by NOMIS 2023

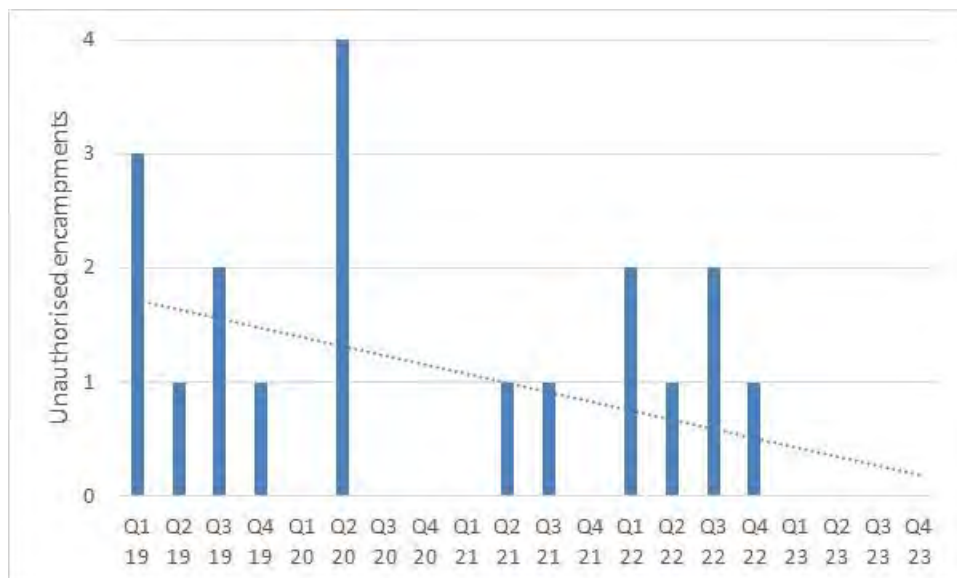
### DLUCH Traveller Caravan Count

- 3.11 No caravans were recorded in North Norfolk by the January 2024 Caravan Count although an average of four caravans were recorded on authorised pitches between July 2021 and July 2022. However, given the number of pitches in the district (see para. 3.13), it is likely that this represents an undercount of Gypsy and Traveller caravans in the district.

### Data on unauthorised sites

- 3.12 North Norfolk District Council records data on unauthorised encampments (i.e. caravans residing temporarily on 'pitches' without planning permission). Figure 3.1 shows the number of caravans recorded between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24 in North Norfolk. It shows that over the 5-year period there was a total of 20 unauthorised encampments in the district with an average of 1 per quarter (although some quarters recorded no unauthorised encampments including none in 2023/24 compared to a peak of 4 in Q2 2020/21). The dotted trend line shows that, on average, the number of unauthorised encampments recorded in North Norfolk declined between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24. On average, 2 caravans were recorded on each unauthorised encampment.

**Figure 3.1 Unauthorised encampments in North Norfolk Q1 2019/20 to Q4 2023/24**



Source: Jan 2024 DLUHC Traveller Caravan Count

### Permanent residential pitches within the study area

- 3.13 As Table 3.3 shows that there are a total of 14 authorised pitches in the study area and 2 on unauthorised developments. There are no local authority-owned permanent sites, but there are 2 local authority owned and managed transit sites with 20 pitches. This information was clarified by site visits, council data, and consultations with households and stakeholders.

**Table 3.3 Study area Gypsy and Traveller pitches**

	Private pitches	LA pitches	Temp pitches	UD pitches	Total
Total	14	0	0	2	16

Source: GTANA 2024

### Transit pitches

- 3.14 There are two short-stay stopping places for Gypsies and Travellers provided by North Norfolk District Council including 10 transit pitches located at Holt Road, Cromer, next to the District Council offices, and 10 transit pitches at the site south of the A148 Holt Road, north-east of Fakenham, 300 metres east of the Clipbush Lane/Fakenham bypass roundabout. Figure 3.2 shows that the number of caravans using the Cromer and Fakenham transit sites declined between 2017 and 2023. However, Covid-19 restrictions may have impacted on usage of the transit sites during 2020 and 2021. Also, both transit sites are in poor condition meaning that Gypsy and Traveller households may be discouraged from using them.

**Figure 3.2 Use of transit sites in North Norfolk 2017 to 2023**

### Travelling Showpeople

- 3.15 The cultural practice of Travelling Showpeople is to live on a plot in a yard in static caravans or mobile homes, along with smaller caravans used for travelling or inhabited by other family members (for example, adolescent children). Their equipment (including rides, kiosks and stalls) is usually kept on the same plot. There are no known Travelling Showpeople plots or yards in the area. There are visiting Showpeople events (fairs and circus events) and also Showpeople living in bricks and mortar with yards used for storing their equipment and others who live in bricks and mortar who own and manage stationary venues (such as amusements and static fairground rides) within the area.

### Summary

- 3.16 The 2021 Census indicates that there are 86 Gypsies and Travellers residing in North Norfolk, representing around 0.08% of the usual resident population.<sup>19</sup> This is below both the average for the East of England (0.14%) and England & Wales (0.11%). Just under a fifth (18%) of Gypsy and Traveller households living in North Norfolk were recorded as residing in a caravan or other mobile home, whilst just over four fifths (82%) were recorded as residing in bricks and mortar accommodation.
- 3.17 No caravans were recorded in North Norfolk by the January 2024 Caravan Count although an average of four caravans were recorded on authorised pitches between July 2021 and July 2022.

<sup>19</sup> See ONS 2021 Census Table KS201EW Ethnic Group located at: <http://www.ons.gov.uk/>

- 3.18 Over the 5-year period Q1 (April to June 2019/20) to Q4 (January to March) 2023/24 there were a total of 20 unauthorised encampments in the district with an average of 1 per quarter. On average, the number of unauthorised encampments recorded in North Norfolk declined between Q1 (April to June 2019/20) to Q4 (January to March) 2023/24. On average, 2 caravans were recorded on each unauthorised encampment.
- 3.19 There are a total of 14 authorised pitches in the district and 2 on unauthorised developments. There are no local authority-owned permanent sites, but there are 2 local authority owned and managed transit sites consisting of 20 pitches. The number of caravans using the transit sites declined between 2017 and 2023. However, Covid-19 restrictions may have impacted on usage of the transit sites during 2020 and 2021, and both transit sites are in poor condition meaning that Gypsy and Traveller households may have been discouraged from using them.

## 4. Stakeholder consultation

### Introduction

- 4.1 Consultations with a range of stakeholders were conducted to provide qualitative information about the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The aim of the consultation was to obtain both an overall perspective on issues facing these groups and an understanding of local issues that are specific to the study area.
- 4.2 In recognition that Gypsy and Traveller issues transcend geographical boundaries and the duty to cooperate in addressing the needs of Gypsies and Travellers, consultation was undertaken with officers and agencies from within neighbouring authorities, as well as from within the study area.
- 4.3 Themes included: existing provisions; main issues facing the different community groups in relation to accommodation, drivers for new accommodation; the need for additional provisions and facilities; travelling patterns; unauthorised encampments; planning process; communication between service providers; access and use of services (such as health and education); the availability of land; barriers to new provision; accessing services; and work taking place to meet the needs of the different community groups. This chapter presents brief summaries of the consultation with stakeholders and highlights the main points that were raised.

### Accommodation needs

#### *Gypsies and Travellers*

- 4.4 It was generally agreed that there is a lack of accommodation provision across the study area and surrounding authorities. It was commented that there are not enough permanent pitches for Gypsies and Travellers or plots for Showpeople. Stakeholders commented on how a lack of provision has led to overcrowded pitches and plots, unauthorised encampments and developments, or households having to reside in brick-and-mortar accommodation. It was suggested that some households residing in bricks and mortar accommodation are struggling and would prefer to reside in trailers.
- 4.5 Stakeholders emphasised that small family sites and yards were the most favoured form of provision and tended to be of a higher standard compared to larger sites. It was generally acknowledged that there is a lack of accommodation provision throughout the county. This is in terms of both permanent and transit provisions. It was suggested that some Gypsy and Traveller families often 'get by' by travelling on the road, using transit sites, and residing in bricks-and-mortar accommodation.

- 4.6 Stakeholders acknowledged that there are transit sites across the county, including two within North Norfolk. However, they expressed concerns about the condition of all transit provision. The two in North Norfolk, for example do not have any electric provision, minimum water and toilet provision (if any at times) and were dusty gravel and not always easy to access (being locked and households not knowing how to access. Others spoke of how families do not like to use the sites, not only due to the condition, but also due to location (in particular the one in Cromer (between local authority office and police station)) and households not wanting to mix with other households on enclosed sites.
- 4.7 Stakeholders are increasingly advocating for "negotiated stopping places" over new transit sites, a model allowing temporary, agreed-upon caravan placements with basic services. This approach, fostering agreements between authorities and temporary residents about mutual expectations, is seen as a positive way forward.

### ***Travelling Showpeople***

- 4.8 The Showmen's Guild confirmed that there are no known accommodation yards in the study area. Travelling Showpeople families operate events and funfairs in the study area, including some along the seafront. As such, some storage yards in the study area are used by Travelling Showpeople. However, these are not used for accommodation, and the Travelling Showpeople households reside in houses.
- 4.9 A representative from the Showmen's Guild stated that they have expressed concern for many years about a lack of Showpeople provision in local areas. Consequently, yards in neighbouring authorities are full, and families are struggling to find new places. Showpeople were regarded by stakeholders as travelling for work rather than cultural needs, leisure or pleasure, and tended to only stop at pre-arranged fair or circus venues. In contrast, Gypsies, Travellers were regarded by stakeholders as being communities for whom travelling is an important element of their identity.

### **Barriers to Accommodation Provision**

- 4.10 Key barriers to new accommodation provision noted by stakeholders included public and political opposition to new sites; a lack of suitable land; the high cost of suitable land; lack of interest from landowners to developing new sites; different local authorities applying different planning guidance in relation to the development of new sites.
- 4.11 Stakeholders commented on how local authority 'calls for sites' rarely lead to potential sites being put forward by the private sector. Also, it can be difficult to gain public acceptance of proposals for new sites or yards. Landowners may be reluctant to offer land for development as new sites or yards if alternative uses are regarded as more

profitable. Stakeholders suggested that allocating land for the development of new sites or yards assures the Gypsy, Traveller and Showpeople communities that accommodation needs would be met.

- 4.12 It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers, and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Land suitable for the development of new sites and yards tends to be too expensive for local Gypsy and Traveller households and is more likely to be used for the development of residential properties. This often leaves small parcels of land for the development of new sites, which are not always in locations suitable for the development of new sites. Also, land in more rural locations is more likely to be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites, although larger sites can be difficult to manage and lead to conflict between families.
- 4.13 Difficulty in identifying suitable land and affordability were cited as key barriers to the provision of new sites and yards. It was suggested that there is too few permanent sites or yards is mainly due to a lack of suitable land and limited funding for the development and maintenance of new provision. The process of identifying suitable land was also deemed problematic.
- 4.14 It was suggested that local authorities should ensure that Local Plans make it clear how the requirement for new pitches will be met. Also, they should work closely with the development industry, Registered Providers, and landowners to explore opportunities for new sites. It was also suggested that all new local developments should include provisions for these communities. Some local authorities may have land suitable for development.
- 4.15 Applicants sometimes sought planning permission for the minimum number of pitches or plots with the intention of seeking permission for further pitches or plots at a later date. This is not problematic if the site or yard is large enough to cope with expansion. It was noted that some planning permissions for new provisions within the study area were initially refused but later granted on appeal. Gaining planning permission for a new sites or yards was regarded by stakeholders as a significant hurdle.
- 4.16 A key barrier to new provision mentioned by stakeholders is discriminatory attitudes towards the travelling communities. In response, it was suggested that it is important to determine policy responses in order to manage conflict that may arise from the development of new provision. This will require planning departments to work in liaison with other local authority departments and agencies.

- 4.17 Stakeholders mentioned a lack of respect and understanding between travelling communities and the settled community, noting that negative social media can worsen tensions. Problems are often more noticeable when land used for unauthorised camps is left in bad condition. However, there seems to be less awareness of issues between permanent site residents and the settled community. Furthermore, stakeholders observed that media coverage, both national and local, of the Gypsy and Traveller communities is mostly negative. This coverage shapes public perceptions, particularly concerning unauthorised encampments, and negatively influences both the public and elected officials' attitudes towards approving new sites.

## **Health and Education**

- 4.18 Stakeholders suggested that, compared to the general population, the health status of Gypsies and Travellers is significantly poorer. A key factor contributing to this includes poor access to healthcare services, particularly for households without permanent accommodation. The living conditions of Gypsies and Travellers, including insecure housing, can have a significant impact on their physical and mental health. It can be difficult for Gypsies and Travellers to register for healthcare services.
- 4.19 Compared with previous generations, Gypsy and Traveller children may be more likely to attend education. However, there can still be difficulties with Gypsy and Traveller children enrolling in schools, Gypsy and Traveller children can face bullying and discrimination in school from their peers, and sometimes, from school staff and schools often lack understanding of Gypsies and Travellers way of life, in particularly when it comes to travel patterns which often result in them needing time away from school.

## **Communication**

- 4.20 It was suggested that there needs to be better cooperation between local authorities in relation to issues concerning Gypsies, Travellers, and Travelling Showpeople. Local authorities tend to react to traveller issues, e.g. in relation to unauthorised encampments and planning applications. There is insufficient cooperation to resolve issues around unauthorised encampments or to improve relations with the travelling community. Financial constraints mean that local authorities are not always able to take a proactive response to issues regarding the travelling communities. For example, suitable land is usually prioritised for residential development, as this yields a greater capital return compared to providing traveller sites.
- 4.21 There is a need for improvement, particularly when assessing needs and understanding the requirements and travelling patterns of the travelling communities at the county or subregional levels. There is a need to work in a joined-up way across the whole of Norfolk and agree on sites for long- and short-term stays, as well as a policy on tolerated sites.



## Summary

- 4.22 The stakeholder consultation offered important insights into the main issues faced by the travelling community within the county. It was generally acknowledged that there is a perceived lack of both permanent and transit accommodation provision. Also, some existing sites are in need of investment and upgrading to meet current standards. Social rented pitches, particularly those on larger sites, are not desirable to all households due to poor conditions and a preference to own pitches rather than pay rent. It was suggested that the main drivers of accommodation needs are younger people requiring future separate accommodation, households setting up unauthorised developments due to difficulties in the planning process and needs arising from households residing in bricks-and-mortar accommodation wanting a pitch.
- 4.23 Key barriers to new accommodation provision noted by stakeholders included a lack of suitable or affordable land, competing interests for suitable land, a lack of finance, and the complexity of planning processes. It was acknowledged by stakeholders that the availability of land (or lack of it) is a key issue in relation to the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The process of identifying suitable land was deemed problematic. Also, land in more rural locations is more likely to be refused planning permission due to being too remote from services. It may be more financially viable to extend existing sites, although larger sites can be difficult to manage and lead to conflict between families.
- 4.24 Compared to the general population, the health status of Gypsies and Travellers is significantly poorer. A key factor contributing to this includes poor access to healthcare services, particularly for households without permanent accommodation. Compared with previous generations, Gypsy and Traveller children may be more likely to attend education. However, there can still be difficulties with Gypsy and Traveller children enrolling in schools, Gypsy and Traveller children can face bullying and discrimination in school from their peers, and sometimes, from school staff and schools often lack understanding of Gypsies and Travellers way of life, in particularly when it comes to travel patterns which often result in them needing time away from school.

## 5. Gypsies and Travellers consultation

### Introduction

- 5.1 This section of the assessment focuses on the consultation with Gypsies and Travellers. It involved questions covering a range of issues related to accommodation and service needs based on a standard questionnaire. Whilst covering all questions, the method and order of questions varied in order to maximise response rates. Methods ranged from an informal style to a more formal approach, which involved asking questions in a specific order.

### Methodology

- 5.2 The consultation included questions regarding issues such as family composition (per pitch), accommodation and facilities, the condition, ownership, management and suitability of current sites and pitches (including facilities and services), occupancy of existing pitches (including the number of, and reasons for, vacant and/or undeveloped pitches, and future plans for pitches), travelling patterns, and accommodation needs.
- 5.3 The consultation achieved a 93% response rate from households. Through direct and indirect consultations, sufficient data was gathered to represent all known, occupied, authorised and unauthorised pitches. Consultation took place with households on 13 of the 14 authorised pitches, as well as with two unauthorised developments. Additionally, three households on transit sites were consulted, none of whom required permanent accommodation within North Norfolk but needed temporary transit accommodation.
- 5.4 The data was used to calculate the level of supply, occupancy and need and which of the two needs categories those with need met. Also, general comments in terms of the key issues were gathered and recorded in order to gain and present further insight and evidence for the needed calculations (summarised below).
- 5.5 The number and location of pitches were determined using local authority data and site visits. Households were consulted on key issues regarding accommodation needs. The combination of local authority data, site visits, and consultation with households helped to clarify the status of pitches (i.e. which pitches are occupied by Gypsies and Travellers, vacant pitches, pitches with planning permission which are planned to be developed or redeveloped, overcrowded pitches, pitches occupied by household members with a need for separate accommodation, and hidden households, amongst other needs issues). Locations where planning permission has lapsed, refused, or withdrawn, or where enforcement action has previously taken place, were also visited to confirm occupancy and use.

- 5.6 Although attempts were made to access Gypsies and Traveller households residing in bricks and mortar accommodation, it was not possible to consult with them. However, an alternative method of determining the accommodation needs of households residing in bricks-and-mortar accommodation has been applied (see step 15 below).

## Existing Supply

- 5.7 There are 14 authorised pitches in the study area. Table 5.1 shows the occupied pitches, vacant pitches (current pitches with planning permission but not occupied at the time of the consultation), and potential pitches (pitches with planning permission expected to be developed or redeveloped and occupied within the first five-year period).

**Table 5.1 Occupied, vacant and potential Gypsy and Traveller pitches.**

Occupied	Vacant	Potential	Total
14	0	0	14

Source: Study area local authority 2024

- 5.8 Table 5.2 below lists the number of authorised pitches per authority, including vacant and potential pitches.

**Table 5.2 Permanent Gypsy and Traveller pitches per authority**

Private	LA	Total
14	0	14

Source: GTAA 2024

- 5.9 Table 5.3 lists the number of pitches per authority with temporary planning permission and those with no planning permission and recorded as unauthorised developments (including unauthorised pitches tolerated by the respective planning authority and those with pending applications or appeals). As can be seen in the needs calculations below (Table 5.3) these pitches contribute towards the additional accommodation needs in the area, due to being in need of permanent planning permission and the occupants having accommodation need.

**Table 5.3 Gypsy and Traveller pitches without permanent permission**

Temporary	Unauthorised developments	Total
0	2	2

Source: GTAA 2024

## **Permanent accommodation need**

- 5.10 Additional accommodation needs mainly derive from households residing on unauthorised pitches or pitches with temporary planning permission requiring permanent permission; households residing on overcrowded authorised pitches; and new family formations expected to arise from within existing family units. Accommodation needs for pitches also derives from households residing in bricks and mortar accommodation. Households residing on sites and stakeholders commented on how it is important to determine this component of accommodation needs.

## **Requirement for permanent residential pitches for the first five years**

- 5.11 The need for residential pitches in the study area is assessed according to a 15-step process based on the model suggested in DCLG (2007) guidance and supplemented by data derived from the survey. The results of this are shown in Table 5.4 below, while the subsequent section contains explanations of the sourcing and calculation of figures for each step. The following table (Table 5.4) relates to the study area as a whole.
- 5.12 As discussed in Chapter 2, there are differing interpretations of the PPTS (August 2015) definition. As such, the needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column), and second, based on PPTS 2023 ('PPTS' column).

**Table 5.4 Estimate of the need for permanent residential pitches for period 2024-2029**

	Ethnic	PPTS
1) Current occupied permanent residential site pitches	14	14
2) Number of unused residential pitches available	0	0
3) Number of existing pitches expected to become vacant through mortality	0	0
4) Net number of household units on sites expected to leave the area	0	0
5) Number of family units on sites expected to move into housing	0	0
6) Residential pitches planned to be built or to be brought back into use	0	0
Total Additional Supply	0	0
7) Seeking permanent permission from temporary sites	0	0
8) Family units (on pitches) seeking residential pitches in the area	0	0
9) Family units on transit pitches requiring residential pitches in the area	0	0
10) Family units on unauthorised encampments requiring residential pitches	0	0
11) Family units on unauthorised developments requiring residential pitches	2	2
12) Family units currently overcrowded (hidden family members or doubling up)	0	0
13) Net new family units expected to arrive from elsewhere	0	0
14) New family formations expected to arise from within existing family units	3	3
15) Family units in housing with a need for a pitch	2	0
Total Need	7	5
<b>Total Additional Pitch Requirement</b>	<b>7</b>	<b>5</b>

Source: GTAA 2024

### Requirement for permanent residential pitches for 2024-2029: steps of the calculation

5.13 Information from the local authority and the census plus evidence from the survey was used to inform the calculations, including:

- The number of Gypsies and Travellers housed in bricks and mortar a
- The number of existing Gypsy and Traveller pitches
- The number of families residing on unauthorised encampments requiring accommodation (and surveyed during the survey period)
- The number of unauthorised developments (during the survey period)
- The number of temporary pitches
- The number of vacant pitches
- The number of planned or potential new pitches
- The number of transit pitches

5.14 The remainder of this chapter describes both the process and results of the Gypsy and Traveller accommodation needs calculations.

## Supply of pitches

Supply steps (steps 1 to 6) are the same irrespective of which definition of accommodation needs to be used.

### ***Step 1: Current occupied permanent site pitches***

- 5.15 Based on the information provided by the councils and corroborated by site visits and household surveys, there are currently 14 occupied authorised Gypsy and Traveller pitches in the study area.

### ***Step 2: Number of unused residential pitches available***

- 5.16 This relates to those pitches that have planning permission and are developed but not currently in use. There are currently 0 vacant pitches within the study area.

### ***Step 3: Number of existing pitches expected to become vacant***

- 5.17 This is calculated using mortality rates as applied in conventional Housing Needs Assessments. However, the figures for mortality have been increased in accordance with studies of Gypsy and Traveller communities, suggesting a life expectancy approximately ten years lower than that of the general population.<sup>20</sup> This results in the supply of 0 pitches.

### ***Step 4: Number of family units in site accommodation expressing a desire to leave the study area and resulting in the creation of a vacant pitch***

- 5.18 Two households surveyed as part of the GTAA stated that they intend to leave the study area in the next five years. As there is no data regarding households who would like to in-migrate from outside the study area, both in- and out-migration are determined as 0.

### ***Step 5: Number of family units on permanent pitch site accommodation expressing a desire to reside in housing and resulting in the creation of a vacant pitch***

- 5.19 This is determined by survey data. It was assumed that all those currently residing on sites planning to move into housing in the next five years (step 5) or preferring to move into housing from an overcrowded pitch (step 11) would be able to do so. This resulted in a supply of 0.

### ***Step 6: Residential pitches planned to be built or brought back into use***

- 5.20 This is determined by local authority data and from an assessment of sites during visits. Such pitches are referred to as 'potential'. This means that the pitches have been granted planning permission but have not yet been developed. Potential pitches

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<sup>20</sup> E.g. L. Crout, *Traveller health care project: Facilitating access to the NHS*, Walsall Health Authority, 1987.

include those that have been partly developed or that were previously occupied but are currently not occupied and in need of redevelopment. There are zero pitches in the study area that are expected to be built or brought back into use during the period 2024-2029.

## **Need for pitches**

- 5.21 As discussed in Chapter 2, this needs assessment provides two accommodation needs figures: first, based on ethnic identity ('Ethnic' column), and second, based on PPTS 2023 ('PPTS' column).

### ***Step 7: Seeking permanent permission from temporary sites***

- 5.22 This is determined by local authority data. It is assumed that families residing on pitches whose planning permission expires within the period 2024-2029 will still require accommodation within the study area. There are currently 0 pitches with temporary planning permission located in the study area. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

### ***Step 8: Family units on pitches seeking residential pitches in the study area and not leading to making a pitch vacant and available for others to occupy***

- 5.23 This is determined by survey data. These family units reported that they 'needed or were likely' to move to a different home in the next five years and wanted to stay on an authorised site or that they were currently seeking accommodation.
- 5.24 This category of accommodation needs overlaps with those moving due to overcrowding, counted in step 12, and so any family units which both are overcrowded and seeking accommodation are deducted from this total. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

### ***Step 9: Family units on transit pitches seeking residential pitches in the study area***

- 5.25 This is determined by survey data. Three households were consulted of which none reported that they required permanent pitches within the study area in the next five years. This generates a total need in the study area of 0 pitches ('ethnic') and 0 pitches ('PPTS').

### ***Step 10: Family units on unauthorised encampments seeking residential pitches in the study area***

- 5.26 Guidance (DCLG 2007) indicates that it should be considered whether alternative accommodation is required for families residing on unauthorised encampments. Using survey data, it has been calculated how many families on unauthorised encampments want residential pitches in the study area. Please note that only Gypsies and Travellers requiring permanent accommodation within the study area

have been included in this calculation – transiting Gypsies and Travellers are included in separate calculations. There were 0 households surveyed on unauthorised encampments within the study area during the survey period.

***Step 11: Family units on unauthorised developments seeking residential pitches in the area***

- 5.27 This was determined by consultation data. The guidance also indicates that the accommodation needs of families living on unauthorised developments for which planning permission is not expected must be considered. Regularising families living on their land without planning permission would reduce the overall level of need by the number of pitches given planning permission. This generates a total need in the study area of 2 pitches ('ethnic'), and 2 pitches ('PPTS').

***Step 12: Family units on overcrowded pitches seeking residential pitches in the area and not leading to making a pitch vacant and available for others to occupy***

- 5.28 This was determined by the consultation. Households which also contain a newly formed family unit that has not yet left are excluded. This is because it is assumed that once the extra family unit leaves (included in the need figures in step 14) their accommodation will no longer be overcrowded. The calculations suggest that the need for additional pitches in the study area to resolve overcrowding over the period 2024-2029 are as follows: 0 pitches ('ethnic definition'), and 0 pitches ('PPTS' definition).

***Step 13: New family units expected to arrive from elsewhere***

- 5.29 In the absence of any data derivable from primary or secondary sources (beyond anecdotal evidence) on the moving intentions of those outside the study area moving into the area, as in the case of those moving out of the area, it is assumed that the inflow of Gypsies and Travellers into the area will be equivalent to the outflow. This amounts to a net inflow of 0 households into the study area.

***Step 14: New family formations expected to arise from within existing family units on sites***

- 5.30 The number of individuals needing to leave pitches to create new family units within the period 2024-2029 was estimated from consultation and excludes those included in steps 8, 12 and 13. This will result in the formation of 3 new households requiring residential pitches over the period 2024-2029 ('ethnic definition'), and 3 pitches ('PPTS' definition).

***Step 15: Family units in housing with need for a pitch***

- 5.31 This was determined firstly by the number of Gypsy and Traveller households residing in bricks and mortar accommodation was determined using 2021 Census



data which records how many Gypsies and Travellers living in the district and by type of accommodation. The number of those living in a caravan (as recorded by the census) was removed from the total to give the number living in bricks and mortar. Based on 2021 Census data, there is an estimated 23 households residing in bricks and mortar accommodation in the study area. Applying a 10% ratio in relation to psychological aversion results in a need for 2 pitches.

- 5.32 As the travelling status of households residing in bricks and mortar accommodation is not known, the accommodation needs arising from these households are only included in the 'ethnic' needs figures. This results in a need for 2 additional pitches in relation to the 'ethnic' definition and 0 pitches in relation to the PPTS definition.

### ***Balance of Need and Supply***

- 5.33 From the above, the Total Additional Pitch Requirement is calculated by deducting the supply from the need.

**Table 5.5: Summary of Gypsy and Traveller pitch needs for the period 2024-2029**

	Ethnic	PPTS
Supply	0	0
Need	7	5
Difference	7	5

Source: GTAA 2024

### **Requirement for permanent residential pitches from 2029-2040**

- 5.34 Considering future accommodation needs, it is assumed that those families with needs stemming from those residing in houses, overcrowding, unauthorised developments and encampments will move onto sites within a 5-year period. As such, only natural population increase (same as step 15 above), mortality, and movement into and out of the study area need to be considered. The base figures regarding the number of pitches on sites at the end of the first 5-year period are shown in Table 5.5 below. Please note that the 2024 base figures include both authorised occupied and vacant pitches, whilst the 2029 base figures assume that any potential pitches have already been developed.

- 5.35 2029 pitch base figures are determined by several factors, including:
- the number of occupied pitches in 2024 (as determined by the household survey)
  - the number of vacant pitches in 2024 (as determined by the household survey)
  - the number of potential pitches (as determined by local authority data)

- accommodation need for the first five-year period (as determined by the GTAA)

- 5.36 It is assumed that by the end of the first five years vacant pitches will be occupied, potential pitches will have been developed and occupied, and any additional need has been met by new supply.
- 5.37 In relation to this accommodation assessment, analysis of the current population indicates an annual household growth rate of 2.35% per annum (compound), equating to a 5-year rate of 12.3%. This is based on an analysis of various factors derived from the surveys, including current population numbers, the average number of children per household, and marriage rates. A mortality rate of 2.825% applied over the 5-year period leads to a net population growth rate of 9.475% rounded to 9.5%.
- 5.38 Tables 5.6 shows the accommodation needs for the study area for the periods 2029-2034 and 2034-2040

**Table 5.6: Summary of accommodation needs 2024-40 (pitches)**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

### **Requirements for transit pitches / negotiated stopping arrangements.**

- 5.39 Whilst acknowledging the existing Transit provision (sites) within the authority this report recommends that the local authority set up a corporate approach around negotiated stopping places policy (see Appendix 1 for an example of a negotiated stopping place protocol). This involves households residing in caravans being able to stop at a suitable location for an agreed and limited period of time, and if necessary, with the provision of services such as waste disposal and toilets. Whilst it is important that the local authority adopts the negotiated stopping place policy, it could be implemented on an individual local authority, across the study area, or on a countywide basis.
- 5.40 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land, providing the encampment does not cause any danger, problems or nuisance to its occupants or the local community. The arrangement is between the local authority, police, and the transient households (and the landowner if situated on privately owned land).

- 5.41 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved to an alternative location that is more suitable. It is important for the local authority to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities.
- 5.42 The characteristics of negotiated stopping places mean that there is no inherent cost of purchasing land or the requirement for the local authority to gain planning permission. It is simply an agreement for transiting households to use appropriate land for an agreed period and provision of, e.g. wheelie bins or skips, and if possible, Portaloo's and porta showers.
- 5.43 Also, the local authority should consider allowing visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time. This will allow households to temporarily accommodate family and friends without fearing that their licence will be at risk due to having too many caravans on site.

## Summary

- 5.44 This chapter has provided both quantitative and qualitative data regarding key characteristics of respondent households residing on Gypsy and Traveller sites. It has determined accommodation needs resulting from the calculations in the tables above for the study area as a whole:

**Table 5.7: Gypsy and Traveller permanent accommodation need (summary)**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
Total	11	9

Source: GTAA 2024

## 6. Conclusion and Recommendations

### Introduction

- 6.1 This final chapter draws conclusions from the evidence. It then makes a series of recommendations relating to meeting the identified need for new provisions, facilities, and recording and monitoring processes.
- 6.2 The chapter begins by presenting a summary of the accommodation needs, followed by a review of the accommodation needs and facilitating the additional accommodation needs. As previously discussed, this report focuses on the assessment of accommodation needs for Gypsies and Travellers. It acknowledges that, whilst there is currently no occupied supply or identified need for Travelling Showpeople, there is still a need to consider them in addressing transit need and any need that might materialise during the local plan period.
- 6.3 The accommodation needs calculations undertaken as part of this GTAA were based on analysis of both secondary data, site visits and consultation with Gypsies and Travellers.

### Permanent accommodation needs

- 6.4 Table 6.1 outlines the permanent accommodation need for Gypsy and Traveller pitches over the period of 2024 to 2040:

**Table 6.1: Gypsy and Traveller permanent accommodation needs**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	7	5
2029-2034	2	2
2034-2040	2	2
<b>Total</b>	<b>11</b>	<b>9</b>

Source: GTAA 2024

### Transit provision

- 6.5 Whilst acknowledging the existing Transit provision (sites) within the authority this report recommends that the local authority set up a negotiated stopping places policy. This is land temporarily used as authorised short-term (less than 28 days) stopping places. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the agreed location for a few days. Amenities such as Portaloo's and showers (or access to alternative nearby facilities) and skips or wheelie bins should ideally be made available for the duration of the agreed period.

- 6.6 According to research undertaken on behalf of the Greater London Authority (GLA) (2019), negotiated stopping is a balanced and humane approach to managing roadside camps. It is based on a mutual agreement between the local authority and Gypsy and Traveller families on matters such as waste disposal and basic temporary facilities. This can sometimes involve directing Gypsy and Traveller households away from contentious public spaces to more appropriate council land. The approach has been proven to achieve significant savings in public spending and decrease social costs for Gypsy and Traveller communities.
- 6.7 The GLA (2019) report cites a number of examples of good practice, including those of Hackney. The local authority has worked closely with the Gypsy and Traveller communities and involved them in dialogue and negotiation. This has resulted in a consistent practice over many years of allowing stopping time and making provision of basic facilities. There have been many locations in the borough that were common stopping places; some were used for short periods of time for families passing through or visiting relatives, and others were used for months and even a couple of years. The practice was also formalised to an extent through leniency agreements, which specified arrangements between the local authority and the Traveller families. This is also incorporated into the council's unauthorised encampment protocol.
- 6.8 The term 'negotiated stopping' is used to describe agreed short-term provision for transient Gypsies and Travellers. It was first developed by Leeds Gypsy and Traveller Exchange (GATE) and involves local authority officers making an agreement with Gypsies and Travellers on unauthorised encampments. The agreement allows Travellers to stay either on the land they are camped on or move to more suitable land (please see Appendix for an example of negotiated stopping place protocol).
- 6.9 Caravans on negotiated stopping places are allowed to stay for an agreed amount of time. This could be on private or public land, providing the encampment does not cause any danger, problems or nuisance to its occupants or local community. The arrangement is between the local authority, police, and the transient households (and the landowner if situated on privately owned land).
- 6.10 The length of the agreement can also vary from 2 weeks to several months but tend to be around 28 days. The agreement is a local one and will vary but may include Travellers agreeing to leave sites clean and not make too much noise with the local authority providing waste disposal and toilets, sometimes showers and water too. However, as Leeds GATE states, negotiated stopping is a locally agreed solution, so it may differ in different locations. For Negotiated Stopping to work, the local authority must negotiate with roadside Travellers. It will involve talking to and consulting roadside Travellers and working out solutions.

- 6.11 The location of a negotiated stopping place could be where the transient household is located at the time they are identified. If not appropriate, the household could be moved on to an appropriate alternative location. It is important for the local authority to respond to the temporary accommodation needs of transiting households within the local authority area rather than simply directing them to neighbouring authorities. Also, the local authority should consider allowing households visiting family or friends who reside on permanent sites in the local authority area to temporarily reside on the site for an agreed amount of time.
- 6.12 Agreements could be made with households residing on sites and allowing visiting family and friends to stay for agreed periods of time. This would lead to fewer unauthorised encampments which adversely impact on the local community and allow households with stopover requirement to stay for an agreed period.

## Summary

- 6.13 The results from this assessment supersede any previous GTAA (including any accommodation need calculated prior to this assessment) for the local planning authorities. This assessment identifies that there is an overall accommodation need in the study area for the local plan period for 11 additional pitches (ethnic definition), and 9 pitches (PPTS 2023). There is no identified additional accommodation need for Travelling Showpeople.
- 6.14 It is recommended that the authority incorporates a policy to address negotiated stopping places for transient and / or visiting Gypsy and Traveller encampments and make this available to Gypsies and Travellers and Travelling Showpeople. It is recommended that the authority incorporates this as part of their local plan as addressing the transit need. There is also the option of reestablishing the existing transit provision, in conjunction with the negotiated stopping policy.
- 6.15 Looking at the distances involved across the study area, anywhere within the Local Plan area would be acceptable in terms of locating new permanent sites and yards to meet the identified need.
- 6.16 This GTAA recommends that North Norfolk in their local plan adopt the 'ethnic' definition accommodation needs figures i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers. This will not only demonstrate knowledge of the overall accommodation need of all Gypsies and Travellers, but also how the accommodation needs in relation to households not meeting the PPTS definition are being addressed. Since the Lisa Smith case (2022) there is greater emphasis on Gypsies and Travellers ethnic identity than their travelling patterns (past or present).

- 6.17 Alternatively, the local authority may adopt the 'PPTS 2023 definition accommodation needs figures with the difference between the PPTS 2023 figures and 'Ethnic' definition being an additional need that the council(s) may choose to meet. This means that the local authority would first meet the need of 9 (5 within the first 5 years) as the obligation but accept the need of a further 2 (2 within the first 5 years) as potential need if further applications are brought forward through windfalls.
- 6.18 In addition to the identified need there may also be an additional element of unidentified need from households residing on unauthorised developments, unauthorised encampments, new households due to in-migration, and those residing in bricks and mortar accommodation who have not identified themselves as ethnic. It is recommended that a flexible policy criteria approach such as in the submitted Plan policy HOU5 is sufficient.
- 6.19 There are currently two pending applications – one for 3 pitches and another for 2 pitches. These will address 4 identified needs for the first five years and 1 for the second five-year period. Additionally, there is a site with the potential to intensify by 1 pitch. As a result, the need for pitches under the PPTS definition for the first five years will be fully met, leaving 2 pitches outstanding under the 'ethnic' category. These remaining needs can be best addressed through windfall applications, in accordance with the submitted policy approach HOU5 resulting in a revised assessment of need as follows:

**Table 6.2: Indicative future Gypsy and Traveller permanent accommodation needs (assuming approval of the two pending applications)**

Period	Ethnic definition	PPTS 2023 definition
2024-2029	1	0
2029-2034	2	1
2034-2040	2	2
Total	5	3

Source: GTAA 2024

- 6.20 In addition to the above in order to meet the specific accommodation need of the different community groups, the report recommends the following:
- In relation to the different community groups, it is recommended that the local authority work closely with the families to determine how their accommodation need can best be met.
  - Also, for the local authority to provide pre-planning application advice to households who have identified land to help determine if it is suitable to address accommodation need.
  - It is recommended that the local authority reviews the planning of unauthorised developments and consider granting permanent status.

6.21 As well as quantifying accommodation need, the study also makes recommendations on other key issues including:

- How the accommodation needs can be met through expansion of existing sites and new sites /yards
- The delivery mechanisms such as being open to the development of sites on a cooperative basis e.g. community land trust, shared ownership, or small sites owned by a local authority but rented to families for their own use
- To consider alternative site funding mechanisms such as: site acquisition funds; loans for private site provision through Community Development Financial Institutions; and joint ventures with members of the different community groups..
- Prior to action being taken against sites or yards being used without planning permission, the local authority, in partnership with landowners, occupants and relevant agencies (e.g. National Federation of Gypsy Liaison Groups and Showmen's Guild (local and national)), to review its current, historic and potential planning status, and review the most effective way forward.
- Implement a corporate policy to provide negotiated stopping arrangements to address unauthorised encampments for set periods of time at agreed locations.
- To liaise with owners of the sites to determine how they could expand the number of pitches to meet the family's accommodation needs when arise .
- The population size and demographics of the Gypsy, Traveller, and Travelling Showpeople communities can change rapidly. As such, in line with Plan review requirements it is recommended that their accommodation needs should be reviewed every 5 to 7 years.
- Housing organisations need to consider allocating culturally appropriate housing to Gypsies and Travellers residing in bricks and mortar, for example, with sufficient space to accommodate a caravan.
- Develop a holistic vision for their work with the different community groups, and embed it in Community and Homelessness Strategies, Local Plans and planning and reporting obligations under the Equality Act 2010.
- Provide training and workshop sessions with local authority and service provider employees (and elected members) to help them to further understand issues relating to the Gypsy and Traveller, and Showpeople communities.
- In liaison with relevant enforcement agencies such as the police to develop a common approach to dealing with unauthorised encampments.
- Encourage local housing authorities to include Gypsy and Traveller categories on ethnic monitoring forms to improve data on population numbers, particularly in housing.
- Better sharing of information between agencies in relation to Gypsy, Traveller and Showpeople communities.



- The population size and demographics of the Gypsy, Traveller and Showpeople communities can change. As such, their accommodation needs should be reviewed every 5 to 7 years.

## Appendix 1: Example negotiated stopping place protocol

This agreement is between [Local Authority] and [named head of family]

This agreement relates to the time limited toleration of your encampment on [Local Authority] owned land adjacent to xxxx. The land is shown on the appending map.

The Council is currently willing to tolerate your encampment on the site for a short period of time until xxxx. The Council recognises its legal obligations to carry out needs assessment prior to initiating legal action to recover possession of land.

[Local Authority] reserves the right to terminate this agreement, and to seek to recover possession of the land through court proceedings, at an earlier date if the terms set out below in this agreement are breached.

I ....., and my family agree to adhere to the following terms:

1. You will be asked to park your caravan and vehicles in a designated place on the site. This is to prevent further caravans joining the encampment. Your family must stay within the boundaries of the site.
2. You will be issued with a toilet. This is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
3. You will be issued with a bin for all your domestic waste. You are responsible for keeping the area around your caravan clean and tidy. The bin is for the sole use of your family, you will have to ensure this is kept in a reasonable condition. This will be emptied weekly.
4. All dogs must be kept under control and tied up. Dogs must be tied up on a lead or in a kennel during the night or when you leave the site for any period of time. The dog wardens will visit this site if loose dogs are reported.
5. No fires larger than a small cooking fire are to be lit, absolutely no burning of commercial or domestic waste is allowed.
6. The nearest Household Waste for larger items is at ..... Trade waste can be disposed at .....
7. Environmental enforcement officers will monitor the site and take action against any activity likely to cause environmental harm, inconvenience or distress to surrounding occupants such as fly-tipping, excessive noise or use of quad bikes.
8. Give consideration to other people within the local vicinity in terms of noise nuisance and the parking of vehicles.
9. Not to engage in any anti-social behaviour, disorder or fly tipping on or near this site. Horses will not be tolerated on the site and the presence of horses may be regarded as 'anti social behaviour' for the purposes of this agreement. Any traps owned by families are not to be used in or around the immediate area.

10. This agreement has been negotiated between [Local Authority] and Gypsy/Traveller people in the [local] area. You are encouraged to cooperate with the Local Authority to make the agreement work by discussing any incidents, concerns or suggestions that may affect the agreement with local authority officers when they visit weekly. You can also telephone the council [phone number], [police liaison officer] or speak to staff at [Third party advocacy where available] if you want them to raise issues on your behalf.

I understand the above points which have been explained to me, and I agree.

Signed.....date.....

Signed.....date.....(local authority)

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# Glossary

## **Amenity block**

A small permanent building on a pitch with bath/shower, WC, sink and (in some larger ones) space to eat and relax. Also known as an amenity shed or amenity block.

## **Authorised site**

A site with planning permission for use as a Gypsy and Traveller site. It can be privately owned (often by a Gypsy or Traveller), leased or socially rented (owned by a council or registered provider).

## **Average**

The term 'average' when used in this report is taken to be a mean value unless otherwise stated.

## **Bargee Travellers and boat dwellers**

As defined by the National Bargee Travellers Association (NBTA):

"Someone who lives aboard a vessel (which may or may not be capable of navigation), that the vessel is used as the main or only residence and where that vessel is either (i) moored in one location for more than 28 days in a year (but may occasionally or periodically leave its mooring); or (ii) has no permanent mooring and navigates in accordance with the statutes appropriate to the navigation such as inter alia s.17(3)(c)(ii) of the British Waterways Act 1995 or s.79 of the Thames Conservancy Act 1932".

The NBTA also distinguish between 'Bargee Travellers' and 'boat dwellers'. 'Bargee Travellers' are people whose main or only home is a boat without year-round access to a permanent mooring. 'Boat dwellers' are considered by the NBTA to be people whose main or only home is a boat and who have year-round access to a permanent mooring, whether or not that mooring has planning consent for residential use.

## **Bedroom standard**

The bedroom standard is based on that which was used by the General Household Survey to determine the number of bedrooms required by families. For this study, a modified version of the bedroom standard was applied to Gypsies and Travellers residing on sites to take into account that caravans or mobile homes may contain both bedroom and residing spaces used for sleeping. The number of spaces for each accommodation unit is divided by two to provide an equivalent number of bedrooms. Accommodation needs were then determined by comparing the number (and age) of family members with the number of bedroom spaces available.

**Bricks and mortar accommodation**

Permanent housing of the settled community, as distinguished from sites.

**Caravan**

Defined by Section 29 (1) of the Caravan Sites and Control of Development Act 1960:

"... any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed, or by being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted."

**Concealed household**

A household or family unit that currently lives within another household or family unit but has a preference to live independently and is unable to access appropriate accommodation (on sites or in housing).

**Doubling up**

More than one family unit sharing a single pitch.

**Emergency stopping places**

Emergency stopping places are pieces of land in temporary use as authorised short-term (less than 28 days) stopping places for all travelling communities. They may not require planning permission if they are in use for fewer than 28 days in a year. The requirements for emergency stopping places reflect the fact that the site will only be used for a proportion of the year and that individual households will normally only stay on the site for a few days.

**Family Owner Occupied Gypsy Site**

Family sites are seen as the ideal by many Gypsies and Travellers in England. They are also often seen as unattainable. There are two major obstacles: money/affordability and getting the necessary planning permission and site licence. While the former is clearly a real barrier to many less well-off Gypsies and Travellers, getting planning permission for use of land as a Gypsy caravan site (and a 'site' in this context could be a single caravan) is currently a major constraint on realising aspirations among those who could afford to buy and develop a family site.

**Family unit**

The definition of 'family unit' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Gypsy**

Member of one of the main groups of Gypsies and Travellers in Britain. In this report it is used to describe English (Romany) Gypsies, Scottish Travellers and Welsh Travellers. English Gypsies were recognised as an ethnic group in 1988.

**Gypsy and Traveller**

The DLUHC's December 2023 definition of Gypsies and Travellers<sup>21</sup>, is set out below:

*For the purposes of this planning policy "gypsies and travellers" means:*

*Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.*

*In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:*

- a) whether they previously led a nomadic habit of life*
- b) the reasons for ceasing their nomadic habit of life*
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.*

**Hidden Household**

A household not officially registered as occupying a site/yard or pitch/plot who may or may not require separate accommodation.

**Household**

The definition of 'household' is used flexibly. The survey assumes that a pitch is occupied by a single household or family unit although it acknowledges that this may also include e.g. extended family members or hidden households.

**Irish Traveller**

Member of one of the main groups of Gypsies and Travellers in Britain. Distinct from Gypsies but sharing a nomadic tradition, Irish Travellers were recognised as an ethnic group in England in 2000.

**Local Authority Sites**

The majority of local authority sites are designed for permanent residential use.

**Local Development Documents (LDD)**

These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory

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<sup>21</sup> See: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites/planning-policy-for-traveller-sites>.



development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

**Negotiated Stopping**

The term 'negotiated stopping' is used to describe agreed short-term provision for Gypsy and Traveller caravans. It does not describe permanent 'built' transit sites but negotiated arrangements which allow caravans to be sited on suitable specific pieces of ground for an agreed and limited period of time, with the provision of limited services such as water, waste disposal and toilets. The arrangement is between the local authority and the (temporary) residents.

**Net need**

The difference between need and the expected supply of available pitches (e.g. from the re-letting of existing socially rented pitches or from new sites being built).

**New Traveller** (formerly 'New Age Traveller')

Member of the settled community who has chosen a nomadic or semi-nomadic lifestyle. The first wave of New Travellers began in the 1970s and were associated with youth culture and 'new age' ideals. They now comprise a diverse range of people who seek an alternative lifestyle for differing reasons including personal or political convictions. Economic activities include making hand-made goods that are sold at fairs.

**Newly forming families**

Families residing as part of another family unit of which they are neither the head nor the partner of the head and who need to live in their own separate accommodation, and/or are intending to move to separate accommodation, rather than continuing to live with their 'host' family unit.

**Overcrowding**

An overcrowded dwelling is one which is below the bedroom standard. (See 'Bedroom Standard' above).

**Permanent residential site**

A site intended for long-stay use by residents. It has no maximum length of stay but often constraints on travelling away from the site.

**Pitch**

Area on a site developed for a family unit to live. On socially rented sites, the area let to a tenant for stationing caravans and other vehicles.

**Primary data**

Information that is collected from a bespoke data collection exercise (e.g., surveys, focus groups or interviews) and analysed to produce a new set of findings.

**Private rented pitches**

Pitches on sites which are rented on a commercial basis to other Gypsies and Travellers. The actual pitches tend to be less clearly defined than on socially rented sites.

**Psychological aversion**

Whilst not a medical condition this is a term that is accepted as part of accommodation assessments in encapsulating a range of factors that demonstrate an aversion to residing in bricks and mortar accommodation (see DCLG October 2007). The factors concerned can include: feelings of depression, stress, sensory deprivation, feeling trapped, feeling cut off from social contact, a sense of dislocation with the past, feelings of claustrophobia. Proven psychological aversion to residing in bricks and mortar accommodation is one factor used to determine accommodation need.

**Secondary data**

Existing information that someone else has collected. Data from administrative systems and some research projects are made available for others to summarise and analyse for their own purposes (e.g. Traveller Caravan Count).

**Settled community**

Used to refer to non-Gypsies and Travellers who live in housing.

**Site**

An area of land laid out and/or used for Gypsy and Traveller caravans for residential occupation, which can be authorised (have planning permission) or unauthorised. Sites can be self-owned by a Gypsy and Traveller resident or rented from a private or social landlord. Sites vary in type and size and can range from one-caravan private family sites on Gypsies' and Travellers' own land, through to large local authority sites. Authorised private sites (those with planning permission) can be small, family-run, or larger, privately-owned rented sites.

**Socially rented site**

A Gypsy and Traveller site owned by a council or private Registered Provider. Similar to social rented houses, rents are subsidised and offered at below private market levels.

**Tolerated**

An unauthorised development or encampment may be tolerated by the local authority meaning that no enforcement action is currently, or likely to be, being taken.

**Transit site/pitch**

This is the authorised encampment option for Gypsies and Travellers travelling in their caravans and in need of temporary accommodation while away from 'home'. Transit sites are sometimes used on a more long-term basis by families unable to find suitable permanent accommodation

**Travelling Showpeople**

People who organise circuses and fairgrounds and who live on yards when not travelling between locations. Most Travelling Showpeople are members of the Showmen's Guild of Great Britain.

**Travelling Showpeople Plot**

Area on a yard for Travelling Showpeople to live. As well as dwelling units, Travelling Showpeople often keep their commercial equipment on a plot.

**Travelling Showpeople Yard**

An area of land laid out and/or used for Travelling Showpeople for residential occupation, which can be authorised (have planning permission) or unauthorised. Yards can be self-owned by a Travelling Showpeople resident or rented from a private or social landlord. Some yards are leased or rented from the Showmen's Guild. They can vary in type and size although they need to consider the need for residents to store and maintain fairground equipment.

**Unauthorised development**

Unauthorised developments include situations where the land is owned by the occupier, or the occupier has the consent of the owner (e.g. is tolerated /no trespass has occurred), but where relevant planning permission has not been granted.

**Unauthorised encampment**

Unauthorised encampments include situations where the land is not owned by the occupier, the land is being occupied without the owner's consent, and as such a trespass has occurred. An encampment can include one or more vehicles, caravans or trailers.

**Unauthorised site**

Land occupied by Gypsies and Travellers without the appropriate planning or other permissions. The term includes both unauthorised development and unauthorised encampment.

## Appendix 5: Sustainability Appraisal Addendum

North Norfolk District Council

# Addendum to the Sustainability Appraisal Report

An addendum to the main Sustainability Appraisal Report of the North Norfolk Local Plan Proposed Submission Version, prepared in response to the Planning Inspectors Interim Findings on the Norfolk North Local Plan Examination.

**November 2024**

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Planning Policy Team**

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## **Addendum to the Sustainability Appraisal Report**

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Appendix A – Appraisal of Draft Policies SS 1 Spatial Strategy and HOU 5 Gypsy, Traveller & Travelling Showpeople’s Accommodation.

Appendix B – Appraisal of Draft Additional Site Proposals - Preferred Options

Appendix C – Appraisal of Alternative Site Options

# 1. Introduction

## Background

- 1.1 The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. A sustainability appraisal of the proposals in each Local Plan is required by section 19 of the Planning and Compulsory Purchase Act 2004 and incorporates the required strategic environmental assessment. More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 1.2 **This document is an addendum to the main submitted SA Report [[A3](#)] of the North Norfolk Local Plan Proposed Submission Version, at Regulation 19 Publication Stage [[A1](#)].**
- 1.3 Following the Local Plan examination hearing sessions in January – March 2024, an initial post-hearings letter dated 24 May 2024 [[EH006 \(f\)](#)], (delayed due to the General Election and received by the Council on 22 July 2024) was received in which the Inspector raised three main soundness issues that the Council is required to address and re-consult on.
- 1.4 These matters are separate to other proposed main modifications which will be addressed later and in terms of a sustainability appraisal will form part of a further associated SA report and public consultation.

## Interim Findings

- 1.5 The three main soundness issues are:
  - A shortfall in housing provision;
  - The approach to Small Growth Villages (SGVs) as set out in Policy SS 1 Spatial Strategy of the Local Plan;
  - Updating the Gypsy and Traveller evidence base to reflect the change in definition in December 2023 and to bring forward any necessary changes to the Local Plan that might arise from the updated evidence.
- 1.6 The Inspector’s letter is available as examination document [[EH006 \(f\)](#)], along with the Councils response [[EH006 \(g\)](#)].

## Response to the Interim Findings

- 1.7 After consideration of the Inspectors correspondence an Action Plan has been devised and endorsed through the Council’s Planning Policy & Built Heritage Working Party (PPBHWP) and Cabinet to address the soundness issues identified by the Inspector. Therefore, this additional Sustainability Appraisal (SA) assessment solely



relates to the following matters required to address the soundness concerns raised by the Inspector:

- Small Growth Villages within Policy SS 1 Spatial Strategy:
  - (i) Increase the number of Small Growth Villages by adding a proposed additional ten villages to the list within the Selected Settlements of Policy SS 1 as evidenced by the draft Addendum to the Distribution of Growth Background Paper 2 (updated May 2023) [[C2](#)].
  - (ii) Increase the indicative housing allowance for growth from 6% to 9% across all of the identified SGVs (existing and proposed) within Policy SS 1.
- Additional site allocations and extensions to existing site allocations within Large Growth Towns, Small Growth Towns and Large Growth Villages identified as Selected Settlements within Policy SS 1 Spatial Strategy.
- Update to the Gypsy and Traveller Evidence and make any necessary amendments to Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation and the supporting text.

1.8 The Inspector's subsequent reply to the draft Action Plan is available to view here [[EH006 \(h\)](#)] and which confirms at para. 5 that *'the Council's proposals to increase the supply and flexibility of housing delivery by approximately 1,300 to 1,500 additional dwellings over the plan period, depending on how it is done this should be a good basis for the examination to proceed.'*

1.9 The Inspector states in para.4 of this letter that *'in addition to publishing an updated Gypsy, Traveller and Travelling Showpeople's accommodation needs assessment, the Council should consider what steps need to be taken to address the findings in the plan, including if necessary proposing allocations or amending the criteria in Policy HOU 5. Any proposed changes to the plan should form part of the forthcoming six-week public consultation.'*

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## **2. Purpose and scope of the document**

2.1 The purpose of this document is to provide a summary of the additional SA assessment work undertaken by the Council in order to positively respond to the initial findings and conclusions reached by the Inspector, as detailed in Section 1 above.

2.2 Alongside the baseline information set out in the submitted SA Report, the scope of the SA work within this report is supported by the following supplemental evidence papers:

- Additional Sites Review Background Paper, November 2024.

- Addendum to the Distribution of Growth Background Paper 2, November 2024.
- Settlement Boundary Review: Small Growth Villages Background Paper (Addendum) October 2024.
- North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment 2024.

### 2.3 The assessment of Draft Policy SS1 Spatial Strategy

Draft Policy SS 1 Spatial Strategy is assessed against the SA Objectives of the Sustainability Framework with the inclusion of ten additional villages within the SGV tier of the settlement hierarchy. An Addendum to the Distribution of Growth Background Paper 2 [C2] has been produced to support this proposal, which sets out the village assessments where ten suitable SGVs, based on a revised level of required services and facilities of 1 key service and 3 secondary or desirable services.

### 2.4 The proposed additional ten additional villages are:

- (i) Beeston Regis
- (ii) Erpingham
- (iii) Felmingham
- (iv) Itteringham
- (v) Langham
- (vi) Northrepps
- (vii) Great Ryburgh
- (viii) Stibbard
- (ix) Tunstead
- (x) Worstead

### 2.5 The proposal would see the total number of Small Growth Villages increase from 23 to 33 and would provide a slightly more dispersed pattern of growth than presented in the submission version of Policy SS1 Spatial Strategy of the Local Plan [A1]. The proposed increase of the Indicative Housing Allowance for SGVs from 6% to 9%, where a total increase of existing and proposed SGVs would allow the opportunity for growth of approximately 873 dwellings (a net increase of 421 dwellings).

### 2.6 The assessment of proposed new, additional and extended sites.

The proposed sites are grouped into Preferred Site Options (Group A) and Alternative Site Options (Group B) within the Additional Sites Review Background Paper. Group A sites are those that were previously assessed through the Local Plan's Site Assessment Process and were considered to be suitable for development but were not identified for allocation at Regulation 19 submission stage of the Local Plan. Group B sites are those that have been selected through a review of individual site assessments contained within each Site Assessment Booklet. This review looked at

the potential for sites that were not considered suitable for development but were discounted from the process on grounds that could still allow some development to occur albeit on a smaller scale. Table 1 below sets out the draft additional site proposals and indicates the type of allocation that is being put forward.

Table 1: Draft Additional Site Proposals (Preferred Site Options -Group A) and Alternative Site Options (Group B)

Settlement	Site Reference and Location	Type
<b>Group A Preferred Options</b>		
Blakeney	Draft BLA01/B Land West of Langham Road	Additional allocation
Briston	Draft BRI02/C Land West of Astley Primary School	Extension to existing allocation
Cromer	Draft C10/1 Land at Runton Road/ Clifton Park	Additional allocation
Cromer	Draft C22/4 Land West of Pine Tree Farm	Extension to existing allocation C22/2
Hoveton	Draft HV01/C Land East of Tunstead Road	Extension to existing allocation HOV01/B
Hoveton	Draft HV06/A Land at Stalham Road	New allocation
Ludham	Draft LUD01/C Land South of School Road	Extension to existing allocation LUD01/A
Mundesley	Draft MUN03/A Land off Cromer Road & Church Lane	Extension to existing allocation MUN03/B
North Walsham	Draft NW16 Land East of Mundesley Road	Additional allocation
Stalham	Draft ST04/A Land at Brumstead Road/ Calthorpe Close	A small portion of site STO4 could be considered suitable.
Stalham	Draft ST19/B Land adjacent to Ingham Road	Extension to existing allocation ST19/A
<b>Group B Alternative Site Options</b>		
Cromer	Draft C19/2 Land at Compit Hills	A small portion of site could be considered suitable
Fakenham	Draft F05	The site is located within the existing settlement boundary

	Land between Holt and Greenway Lane	and as such, policies already allow it to come forward for development.
Hoveton	Draft HV05 Land at Horning Road	Site was available at Regulation 19 stage. Deliverability not known.

## 2.7 Draft Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation

The draft policy HOU 5 is reviewed and updated based on the findings of the North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment 2024, which provides the specific proposed accommodation needs for the revised plan period, based on the updated Planning Policy for Travellers Sites (PPTS) definition (2023) and a further figure based on ethnic identity and broader ethnic definition.

## 3. Summary of Methodology

- 3.1 The SA assessments are undertaken in full alignment with the Methodology set out in Chapter 2 of the main SA Report [\[A3\]](#) using the same sustainability appraisal framework as set out in Chapter 6 of the Report [\[A3\]](#). The effects of the proposed options are assessed against each objective of the framework using the decision-making criteria as a guide. The aim of the overall appraisal is to identify whether the Local Plan will have a positive or negative effect on the objectives and whether the effects are likely to be significant on the environment which is a SEA Directive requirement.
- 3.2 It is worth being reminded that it is not the role of the SA to determine the options to be chosen but to inform with the identification of the appropriate options, by highlighting the sustainability implications of each. The determination of which policy approach to use is a matter of a wider judgement with regard to the appropriate strategy.
- 3.3 The approach taken is by using symbols as a way of presenting information regarding the likely effects, for example, beneficial, adverse, uncertain, not significant, combined with commentary seeking to justify the symbol in relation to the baseline information relevant to the sustainability objective. This then aids in the identification of options around enhancement and mitigation.
- 3.4 The SA Objectives are broad indicators of sustainability while many policies are focused on single issues, in some cases the indicator is not applicable, and the assessment is marked with an N/A. The SA key below can be used in association with the cumulative tables in Chapter 6 and the full SA assessments contained within Appendices A, B and C.

### Sustainability Appraisal Key

++	Likely strong positive effect
+	Likely positive effect
0	Neutral/no effect
~	Mixed effects
-	Likely adverse effect
--	Likely strong adverse effect
?	Uncertain effect

- 3.5 For the purposes of this Addendum to the main SA Report [\[A3\]](#), the proposed preferred site options, including extensions to existing site allocations, as well as alternative site options, have been assessed as whole sites, as the nature and context of the SA Objectives and SA Framework have been designed to be applied on this basis, particularly as the assessment of part of a site as an extension would not provide a comprehensive approach to .
- 3.6 The findings of the sustainability appraisals are presented in Appendix A for the draft Policy SS 1, Spatial Strategy and draft Policy HOU 5, Gypsy, Traveller & Travelling Showpeople's Accommodation. Appendices B and C respectively present the sustainability appraisals for the draft additional Preferred Site Options and Alternative Site Options.

## 4. Appraisal of proposed revised or updated draft Policies

- 4.1 Policy SS 1 Spatial Strategy has been chosen as the preferred policy approach, as detailed in Chapter 8 of the submitted SA Report [\[A3\]](#) pages 70-72. The details below identify the purpose of the policy, the proposed changes and why it is the preferred policy approach. The proposed changes incorporate the inclusion of ten additional villages as Small Growth Villages and a proposed increase to the Housing Indicative Allowance to 9% growth for all of the SGVs, the additional 10 and the existing villages as set out in Table 2 Small Growth Villages Housing Apportionment of the Plan [\[A1\]](#), pages 63-65, with the exception of Horning, which has been designated as a Constrained Small Growth Village during the Local Plan Hearing Sessions, where no housing allowance is apportioned to the settlement.

### Draft Policy SS 1- Spatial Strategy

Policy Approach	Why it is preferred
<p>SS 1 – Introduce a policy that sets out the spatial strategy and context for North Norfolk, providing the hierarchy of settlements and overall framework to deliver growth and meet existing and future needs – including the additional draft proposals of:</p> <ul style="list-style-type: none"> <li>• The addition of a further ten villages to the list of SGVs in the hierarchy from 23 to 33 villages.</li> <li>• An increase in the level of growth for all SGVs to 9%.</li> </ul>	<p>The Policy Approach sets out the spatial strategy and context for North Norfolk, providing the hierarchy of settlements and overall framework to deliver growth and meet existing and future needs.</p> <p>This settlement hierarchy policy, along with the proposed site allocations being in the Plan for settlements in the top three parts of the hierarchy, provide a specific focus and degree of certainty, where sites will be developed during the plan period.</p> <p>In addition, alongside existing Small Growth Villages, additional villages have been identified based on the provision of a revised number of services, updated as described in para. 2.3 of this document.</p> <p>A number of criteria have been added to clarify the qualifying conditions and quantities for development in small villages and the types of development that would be permitted as a function of the development boundary to help direct all development.</p> <p>The Preferred Approach ensures that the number of dwellings in any of the selected Small Growth Villages will have the opportunity for small scale growth through an increase of approximately 9% growth from the date of adoption of the Plan. The level of growth is seen to align with approximately 10% of the overall housing target of 8,900 dwellings and accords with the broader strategic policies in the Local Plan.</p> <p>The Policy Approach scores well against most of the environmental, social and economic SA Objectives as the focused growth pattern will help preserve the rural character of the district, while supporting a total of 33 SGVs to grow and thrive in accordance with the para. 83 of the NPPF (2023).</p>
See pages 70-72 of the main SA Report for the full list of Preferred and Alternative Options and why they are not preferred.	

- 4.2 Draft Policy HOU5 Gypsy, Traveller & Travelling Showpeople's Accommodation has updated 2024 evidence in the form of the North Norfolk Gypsy, Traveller, and Travelling Showpeople Accommodation Needs Assessment, which provides the proposed accommodation needs based on the updated Planning Policy for Travellers Sites (PPTS) definition (2023) and a further figure based on ethnic identity and broader ethnic definition. The study recommends that the Council adopt the 'ethnic' definition of accommodation needs figures, i.e. meeting the accommodation needs of all households who ethnically identify as Gypsies and Travellers.
- 4.3 The assessment identifies that there is an overall accommodation need across North Norfolk between 2024 and 2040 of 11 pitches (ethnic need) and 9 Pitches (PPTA,2023). There is no additional accommodation need for Travelling Showpeople. The policy approach is updated in accordance with the study's recommendations.
- 4.4 The draft policy provides for the accommodation needs of Gypsies and Travellers by setting criteria, aligned with the PPTS, and by which windfall planning applications can be approved. This flexible approach will ensure that at least a further 11 pitches can come forward between 2024 and 2040 but also allow more subject to demand. The details below identify the purpose of the policy, the proposed changes and the preferred policy approach.

#### **Draft Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation**

Policy Approach	Why it is preferred
<p>HOU 5 – Introduce a policy to meet the needs for both permanently occupied and transient pitches for the gypsy and traveller communities. The updated evidence provides information that is included in the Policy wording regarding:</p> <ul style="list-style-type: none"> <li>Updating policy to specify the minimum number of permanent pitches that will be provided to meet accommodation needs over the revised Plan period.</li> <li>Adding a further criterion to protect against the loss of existing sites and pitches unless demonstration of the criterion can be met.</li> </ul>	<p>The updated policy approach provides the overall accommodation needs based on the updated Planning Policy for Travellers Sites (PPTS) definition (2023) where the broader ethnic needs are taken into account. The policy approach also sets criteria, aligned with the PPTS, and by which windfall planning applications can be approved. This flexible approach will ensure that as a minimum, a further 11 permanent pitches can come forward between 2024 and 2040 but where more is allowed subject to demand. In addition, a further criterion is added to protect against the loss of existing sites and pitches. Overall, the approach ensures more certainty and flexibility in alignment with the wider sustainable approach and needs of the Local Plan. The Policy Approach scores well against relevant social SA Objectives.</p>
See page 86 of the main SA Report [A3] for the full list of Preferred and Alternative Options and why they were not preferred.	

## 5. Appraisal of Draft Additional Site Proposals and Extensions to existing Site Allocations – Preferred and Alternative Options

- 5.1 The following tables provide a summary of the proposed additional preferred site options, including extensions to existing site allocations within the Local Plan, which have been identified through the Additional Sites Review Background Paper (November 2024) in order to achieve the required increase in housing provision and the reasons for selecting them.
- 5.2 The full sustainability appraisals for the additional preferred site proposals and alternative site options are set out in Appendix B and Appendix C. These detail the scores against the sixteen SA Objectives and also provide an overall conclusion based on the environmental, social and economic groupings of the SA Objectives.

### Blakeney Additional Preferred Option

Site Ref	Site Name	Proposed Use	Why it is preferred
BLA01/B	Land South of Morston Road	Residential	The site has good access to local facilities and services, where access would be from Langham Road. The site sits within the Norfolk Coast National Landscape and close to a number of natural and historic designations. There are also long ranging views of Blakeney Marshes when looking northwards from Langham Road. Consequently, a limited area of the site area is suitable for development where the site abuts the existing built form of the village. Any such development would also need to include sensitive mitigation that incorporates the enhancement of existing natural buffers in conjunction with open space. The Sustainability Appraisal for the site scores neutral overall.

### Briston Additional Preferred Option

Site Ref	Site Name	Proposed Use	Why it is preferred
BRI02/C (Extension to existing allocation BRI02)	Land West of Astley School	Residential	The proposal would extend the existing allocated site BRI02 further southwards, which would also wrap around the rear of Astley Primary School. The site is well integrated to village facilities and services within both Briston and Melton Constable. The extended site scores positively in the Sustainability Appraisal.

### Cromer Additional Preferred Options

Site Ref	Site Name	Proposed Use	Why it is preferred
C10/1	Land at Runton Road	Residential	The is well positioned for access to services and to the town centre. There are good pedestrian links



	/ Clifton Park		available and public transport is in walking distance and suitable access can be provided. Overall, the site scores positively in the Sustainability Appraisal, but there is a mixed Environmental score due to the potential for a negative biodiversity impact being in close proximity to CWSs (Cromer Sea Front, Hall Wood & Cromer Old Cemetery) and SSSI & local geodiversity site (East Runton Cliffs). The site is adjacent to and within the setting of the Norfolk Coast National Landscape. Mitigation measures will need to be incorporated, in terms of the location, scale and design of a development and sensitive landscaping. Overall, the site Sustainability Appraisal scores positively.
C22/4 (Extension to existing allocation C22/2)	Land West of Pine Tree Farm	Mixed Use (Residential + Sports Provision)	The proposal would extend the existing site allocation C22/2 further south of Beckett's Plantation, within the Norfolk Coast National Landscape, where landscape mitigation, along with careful layout and design, will be required to off-set the wider visual impact. Mitigation requirements in relation to the impact on the Grade II Pine Tree Farmhouse are already established in the site-specific policy (C22/2). Overall, the extended site Sustainability Appraisal has a negative and positive score. The Social and Economic objectives score positively, and the Environmental objectives have a mixed score, given the potential negative impact on the designated landscape, biodiversity and nearby heritage asset.

### Cromer Alternative Additional Site Option

Site Ref	Site Name	Proposed Use	Why it is not preferred
C19/2	Land at Compitt Hills (Larners Plantation)	Residential	The entire site is not considered to be suitable for development, as it has a number of constraints. there may be potential for a smaller area to be considered for development. It also has poorer access to services and facilities in Cromer and Roughton Road itself is considered to be sub-standard and unsuitable for large scale development. The Sustainability Appraisal has a positive score overall.

### Fakenham Alternative Additional Site Option

Site Ref	Site Name	Proposed Use	Why it is not preferred
F05	Land Between Holt Road & Greenway Lane	Residential, Retail	The site falls within the settlement boundary of Fakenham and is currently allocated for residential development. The Sustainability Appraisal for the site is positive overall. The site could therefore come forward at any time and does not require allocation.

## Hoveton Additional Preferred Options

Site Ref	Site Name	Proposed Use	Why it is preferred
HV01/C (Extension to existing allocation HOV01/B)	Land East of Tunstead Road	Residential	The proposal would extend the existing site allocation HV01/B further northwards. The larger site may potentially have some impact on heritage assets to the north including Hoveton Hall Park and Gardens, and as such, landscape mitigation to the northern boundary will need to be carefully considered. Access for the site is from Tunstead Road, the extension will not require an additional access however it does provide an opportunity to provide a through connection to Stalham Road and the adjoining allocation, HV06/A. Overall the site scores positively in the Sustainability Appraisal.
HV06/A	Land at Stalham Road	Residential	The site has existing residential development on both sides and on the opposite side of Stalham Road. Access can be achieved from Stalham Road and there is potential for vehicular and pedestrian access to connect to the adjoining allocation, HV01/C. Overall, the site scores positively in the Sustainability Appraisal.

## Hoveton Alternative Additional Site Option

Site Ref	Site Name	Proposed Use	Why it is not preferred
HV05	Land South of Littlewoods Lane	Residential	A smaller area of this site has been considered for development. The site is well related to the village and services. However, it is considered that the issues previously cited for the site cannot be resolved, being highly visible in the landscape, extending into open countryside beyond the current confines of the village and the potential for an adverse impact on the wider landscape. The overall Sustainability Appraisal scores positively.

## Ludham Additional Preferred Option

Site Ref	Site Name	Proposed Use	Why it is not preferred
LUD01/C (Extension to existing allocation LUD01/A)	Land South Of School Road	Residential	The proposal is for the extension of the existing site allocation LUD01/A where the site forms an L-shape form extending to the south and west. The site is within walking distance of a number of local facilities and services. Access to the southern part of the site will be provided from Norwich Road and an area of open space should be provided to allow retention of views of the Grade I Listed St. Catherine's Church tower. In addition, landscape buffers could mitigate and soften views of the site from the north and west. The overall Sustainability Appraisal for the extended site has a positive and negative score.

## Mundesley Additional Preferred Option

Site Ref	Site Name	Proposed Use	Why it is preferred
MUN03/A (Extension to existing allocation MUN03/B)	Land at Cromer Road and Church Lane	Residential	The proposal extends the existing allocation MUN03/B to the south and southwest, where two parcels of land are linked by part of a former railway embankment, which provides an opportunity for an enhanced area of open space that connects the two distinct parts of the extended site allocation. The site is well located to access the local village facilities and services and there are good public transport options available. Access to the extended southern part of the site would be from Church Lane. Overall, the Sustainability Appraisal for the extended site has a positive and negative score.

## North Walsham Additional Preferred Option

Site Ref	Site Name	Proposed Use	Why it is preferred
NW16	Land at End of Mundesley Road	Residential	The site has good access to local services, education facilities, peak time public transport links, leisure and cultural opportunities, as well as employment opportunities. A short section of CWS Paston Way & Knaption Cutting crosses the northwest corner of the site and along with other nearby natural and historic environment designations the site will require sensitive landscape mitigation and buffers. Overall the Sustainability Appraisal has a positive and negative score.

## Stalham Alternative Site Options

Site Ref	Site Name	Proposed Use	Why it is not preferred
ST04/A (Small portion of ST04)	Land at Brumstead Road / Calthorpe Close	Mixed Use	The site ST04/A is a smaller area of the previously assessed ST04. The site has good access to local services, education facilities, peak time public transport links, leisure and cultural opportunities, as well as employment opportunities. There are opportunities to retain and enhance existing landscape features within and adjacent to the site and improve connectivity via the PROW to the east. In addition, landscape mitigation will need to be provided in relation to longer views from the north. Overall, the Sustainability Appraisal for the proposed smaller site scores positively.
ST19/B (Extension to existing allocation ST19/A)	Land Adjacent Ingham Road	Residential	The site ST19/B is an extension to the existing site allocation ST19/A. The site would be extended to the northeast, being well situated to existing housing. It has good access to local services, education facilities, peak time public transport links, leisure and cultural opportunities, as well as employment opportunities. Landscape mitigation will be required along the north-eastern boundary

			to off-set the impact on wider views and provide a buffer between the development and existing dwellings. The overall Sustainability Appraisal score is positive.
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## 6. Summary of Cumulative and Significant effects

### Prediction, Evaluation and Mitigation of the Effects of the Plan

- 6.1 In the context of the main SA Report and this Addendum, the strategic actions are the draft policies and proposals. The prediction of effects seeks to consider the direct and indirect effects of the policies against the baseline and considers the scale, probability and impact of them. The effects have been identified through the full appraisal in the main SA Report Appendices B and C, with those assessed within this Addendum being updates to those policies and proposals and the cumulative appraisal below.

### Summary of Cumulative Assessment

- 6.2 Table 2 below summarises the most sustainable policies as well as cumulative impacts and details how the different policies promote different aspects of sustainability across the 16 SA Objectives.

Table 2: Mitigation, Cumulative, Secondary and Synergistic Impact - Policies

Policy	Sustainability Appraisal Objectives															
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
CC1 – Delivering Climate Resilient Sustainable Growth	++	+	+	+	+	++	++	++	++	++	0	+	+	0	0	+
CC2 - Renewable & Low Carbon Energy	0	+	+	++	+	+	n/a	0	0	n/a	n/a	n/a	n/a	+	n/a	n/a
CC3 - Sustainable Construction, Energy Efficiency & Carbon Reduction	n/a	+	+	++	n/a	+	n/a	n/a	n/a	++	n/a	+	n/a	0	n/a	n/a
CC4 - Water Efficiency	n/a	++	++	++	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	0	n/a	n/a
CC5 – Coastal Change Management	+	n/a	n/a	+	+	n/a	n/a	0	n/a	+	n/a	n/a	n/a	n/a	n/a	n/a
CC6 - Coastal Change Adaptation	+	+	n/a	++	+	n/a	n/a	+	n/a	+	n/a	+	n/a	+	n/a	n/a
CC7 - Flood Risk & Surface Water Drainage	n/a	n/a	++	++	n/a	++	+	n/a	n/a	+	n/a	+	n/a	n/a	n/a	n/a
CC8 - Electric Vehicle Charging	n/a	n/a	n/a	+	+	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+	n/a	+
CC9 – Sustainable Transport	n/a	n/a	n/a	+	+	n/a	~	n/a	n/a	+	n/a	+	+	+	n/a	++
CC10 – Biodiversity Net Gain	+	n/a	+	++	n/a	++	++	++	+	+	n/a	n/a	+	n/a	n/a	n/a
CC11 - Green Infrastructure	0	n/a	+	+	n/a	++	++	++	+	++	n/a	n/a	n/a	n/a	+	+

CC12 – Trees, Hedgerows & Woodland	0	n/a	n/a	++	n/a	++	++	++	+	++	n/a	n/a	n/a	n/a	n/a	n/a
CC13 – Protecting Environmental Quality	+	+	+	n/a	++	0	n/a	+	n/a	+	n/a	0	+	n/a	n/a	0
<b>DRAFT</b> SS1 – Spatial Strategy	0	0	0	+	+	+	+	+	+	+	0	+	+	+	++	+
SS2 - Development in the Countryside	0	0	0	0	0	0	+	0	0	+	n/a	+	+	+	n/a	-
SS3 - Community Led Development	0	0	0	0	0	+	+	+	+	++	+	++	++	+	0	0
HC1 – Health & Wellbeing	n/a	n/a	n/a	0	n/a	n/a	n/a	n/a	n/a	+	n/a	+	n/a	+	n/a	+
HC2 – Provision & Retention of Open Spaces	0	n/a	+	+	n/a	+	++	++	++	++	n/a	n/a	n/a	+	n/a	~
HC3 - Provision & Retention of Local Facilities	n/a	0	0	0	0	n/a	n/a	n/a	n/a	+	n/a	n/a	n/a	+	+	+
HC4 – Infrastructure Provision, Developer Contributions & Viability	n/a	n/a	+	0	+	++	+	n/a	n/a	++	n/a	+	n/a	+	n/a	0
HC5 - Fibre to Premises (FTTP)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	0	+	+	+	+	++	+	+
HC6 - Telecommunications Infrastructure	0	n/a	n/a	n/a	n/a	+	n/a	+	+	+	n/a	n/a	+	+	+	+
HC7 - Parking Provision	+	n/a	n/a	+	~	n/a	n/a	n/a	n/a	+	n/a	+	+	+	+	+
HC8 - Safeguarding Land for Sustainable Transport	0	n/a	n/a	+	n/a	~	+	n/a	n/a	+	n/a	0	+	+	+	+
ENV1 - Norfolk Coast Area of Outstanding Natural Beauty & The Broads	0	n/a	n/a	n/a	0	+	+	+	0	0	n/a	0	n/a	n/a	0	-
ENV2 - Protection & Enhancement of Landscape & Settlement Character	++	n/a	n/a	+	n/a	+	++	++	++	+	n/a	n/a	+	n/a	+	n/a
ENV3 - Heritage & Undeveloped Coast	n/a	n/a	n/a	++	n/a	n/a	n/a	+	n/a	+	n/a	n/a	n/a	+	0	~
ENV 4 Biodiversity & Geodiversity	n/a	n/a	+	+	n/a	++	++	++	+	+	n/a	n/a	+	n/a	n/a	n/a
ENV5 – Impacts on International & European sites, Recreational Impact Avoidance Mitigation Strategy	n/a	n/a	n/a	+	n/a	++	++	+	+	++	n/a	n/a	n/a	n/a	+	0
ENV6 - Protection of Amenity	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	n/a	++	+	+	n/a	n/a	+	n/a
ENV7 - Protecting & Enhancing the Historic Environment	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	++	+	n/a	n/a	n/a	n/a	+	n/a
ENV8 - High Quality Design	++	n/a	+	++	n/a	++	++	++	++	++	++	++	n/a	+	+	+
HOU1 – Delivering Sufficient Homes	-	0	-	+	n/a	?	+	+	?	+	n/a	++	+	++	++	+
HOU2 – Delivering the Right Mix of Homes	n/a	n/a	n/a	n/a	n/a	n/a	n/a	0	n/a	++	n/a	++	+	n/a	0	n/a
HOU3 - Affordable Housing in the Countryside	-	n/a	-	0	0	0	0	0	0	++	n/a	++	n/a	+	0	-

HOU4 - Essential Rural Worker Accommodation	-	n/a	0	0	0	?	0	0	0	++	n/a	+	n/a	+	0	0
<b>DRAFT</b> HOU5 - Gypsy, Traveller & Travelling Showpeople's Accommodation	-	n/a	0	0	?	?	n/a	+	?	+	+	+	n/a	+	n/a	0
HOU6 - Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	+	0	0	0	0	0	n/a	+	?	+	n/a	+	n/a	n/a	n/a	n/a
HOU7 - Re-use of Rural Buildings in the Countryside	+	0	0	?	0	0	n/a	-	+	+	n/a	+	+	+	n/a	-
HOU8 - Accessible & Adaptable Homes	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a	++	+	+	+	n/a
HOU9 - Minimum Space Standards	0	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	n/a	++	n/a	?	n/a	n/a
E1 - Employment Land	0	n/a	0	0	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	++	++	+	+
E2 - Employment Areas, Enterprise Zones & Former Airbases	+	n/a	n/a	0	+	n/a	n/a	+	+	+	n/a	n/a	++	++	+	~
E3 - Employment Development Outside of Employment Areas	++	n/a	n/a	?	?	n/a	n/a	n/a	n/a	+	n/a	n/a	++	++	n/a	~
E4 - Retail & Town Centre Development	+	0	0	+	n/a	?	+	+	+	+	++	+	+	+	++	++
E5 - Signage & Shopfronts	n/a	n/a	n/a	n/a	n/a	n/a	n/a	++	++	n/a	n/a	n/a	n/a	+	++	n/a
E6 – New Tourist Accommodation, Static Caravans & Holiday Lodges & Extensions to Existing Sites	~	0	0	+	+	++	n/a	+	?	~	n/a	n/a	+	++	n/a	+
E7 - Touring Caravan & Camping Sites	~	0	0	0	+	++	n/a	+	?	+	n/a	n/a	+	++	n/a	-
E8 – New Tourist Attractions & Extensions	0	0	0	0	+	+	n/a	+	?	+	n/a	n/a	+	++	n/a	-
E9 - Retaining an Adequate Supply & Mix of Tourist Accommodation	+	0	0	0	n/a	n/a	n/a	n/a	n/a	+	n/a	n/a	+	+	n/a	n/a

Table 3: Mitigation, Cumulative, Secondary & Synergistic Impacts – Sites

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
BLA04/A	Blakeney	Residential	-	++	+	++	0	-	?	-	?	+	+	++	0	0	+	0
<b>DRAFT</b> BLA01/B	Blakeney	Residential	-	++	+	++	0	-	0	-	0	+	+	++	0	0	+	0
BRI01	Briston	Residential	0	++	+	++	~	?	0	0	?	+	+	++	0	0	+	+
<b>DRAFT</b> BRI02/C	Briston	Residential	0	++	+	++	~	?	0	0	?	+	+	++	0	0	+	+
C07/2	Cromer	Residential	+	++	+	++	++	-	0	-	0	++	+	++	+	0	++	+
<b>DRAFT</b> C10/1	Cromer	Residential	-	++	++	++	0	-	?	-	0	+	+	++	+	0	++	+
C16	Cromer	Residential	-	++	+	++	+	-	0	-	0	++	+	++	+	0	++	+
<b>DRAFT</b> C22/4	Cromer	Residential	-	++	+	++	0	-	?	--	-	+	+	++	+	0	++	+
F01/B	Fakenham	Residential	-	++	+	++	+	?	?	-	0	++	+	++	++	0	++	+
F02	Fakenham	Residential	-	++	~	~	0	?	0	-	0	+	+	++	0	0	++	0
F03	Fakenham	Residential	-	++	+	++	0	?	0	-	0	+	+	++	++	0	++	+
F10	Fakenham	Residential	+	++	+	+	0	-	+	-	0	++	+	++	++	0	++	+
H17	Holt	Residential	-	++	+	++	0	-	0	-	-	+	+	++	+	0	++	+
H20	Holt	Residential	-	++	+	++	0	-	?	-	-	+	+	++	+	0	++	+
<b>DRAFT</b> HV01/C	Hoveton	Residential	-	++	+	++	0	?	?	-	0	++	+	++	++	0	++	++
<b>DRAFT</b> HV06/A	Hoveton	Residential	-	++	+	++	0	?	0	-	0	++	+	++	++	0	++	++
<b>DRAFT</b> LUD01/C	Ludham	Residential	-	++	+	++	0	?	0	-	0	0	+	++	0	0	+	0
LUD06/A	Ludham	Residential	-	++	+	++	0	-	0	-	0	0	+	+	0	0	+	+
<b>DRAFT</b> MUN03/A	Mundesley	Residential	-	++	~	~	+	-	0	-	-	~	+	++	+	0	+	+
<b>DRAFT</b> NW16	North Walsham	Residential	-	++	~	++	0	-	?	-	-	++	+	++	+	0	++	+
SH04	Sheringham	Residential	0	++	~	~	~	-	0	0	0	++	+	++	+	0	++	++
SH07	Sheringham	Residential	-	++	~	~	0	-	0	-	0	++	+	++	+	0	++	+

SH18/1B	Sheringham	Residential	-	++	+	++	0	-	?	-	-	++	+	++	+	0	++	+
DRAFT ST04/A	Stalham	Residential	-	++	~	~	0	?	0	-	0	++	+	++	+	0	++	++
DRAFT ST19/B	Stalham	Residential	-	++	+	++	0	?	?	-	0	++	+	++	+	0	++	++
W01/1	Wells	Residential	-	++	+	++	0	-	?	-	0	+	+	++	+	0	++	+
W07/1	Wells	Residential	-	++	+	+	0	-	0	-	-	++	+	++	+	0	++	+
NW01/B	North Walsham	Mixed Use	~	++	+	++	+	?	0	-	-	++	+	++	++	+	++	+
NW62/A (includes new area of land at northern end)	N. Walsham	Mixed Use [Residential, Employment, School, Open Space]	-	++	~	++	~	?	+	~	-	++	+	++	+	?	++	+
ST23/2	Stalham	Mixed Use [Residential & Employment]	0	++	~	~	0	-	?	-	-	++	+	++	++	++	++	++
H27/1	Holt	Employment	+	++	+	++	0	-	?	-	-	+	+	N/A	++	++	++	+
NW52	N. Walsham	Employment	--	++	~	++	~	?	?	--	0	-	+	N/A	++	++	~	0
E7	Tattersett	Employment	~	++	~	~	~	-	0	~	-	--	+	N/A	++	++	-	--



### Conclusions of Cumulative Assessment

- 6.3 Almost all of the policies, including the updated draft policies and proposals assessed, are predicted to have positive effects on the relevant SA indicators.
- 6.4 The proposed revisions and updates to the two draft policies, SS 1 Spatial Strategy and HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation, bolster the significant positive cumulative effects in relation to the strategic and housing policies of the Plan. Where cumulatively, they are likely to have a positive effect upon the baseline indicators relating to different types of residential accommodation, by setting an appropriate framework for the delivery of homes that seek to boost supply in a sustainable way.
- 6.5 The cumulative assessment also confirms that the natural and historic environment including landscape character, biodiversity and heritage indicators would continue to achieve an overall positive cumulative effect when incorporating the proposed changes.
- 6.6 In terms of the overall site options, including the additional draft site proposals set out in Table 3 above, the majority of the sites score positively against SA Objectives SA10 and SA12, which relate to improving the quality of where people live and ensuring that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs.
- 6.7 **Overall, the incorporation of the draft changes to the policies and proposals in the Plan, is likely to strengthen the predicted significant positive effects on the environmental, social and economic aspects of sustainability.**

## 7. Evaluation of Significant Effects

- 7.1 Twelve of the sixteen SA Objectives refer to one or both of the two draft policies, SS1 Spatial Strategy and HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation, in their assessments of significant effects. These have been reproduced and reviewed below. The complete significant effects assessment is contained within Chapter 10 (pages 145 – 155) of the main SA Report [\[A3\]](#) and this will be fully reviewed as part of the further SA assessment in relation to the proposed Main Modifications of the Local Plan, particularly as this will include the full complement of modifications to all of the policies and proposals.
- 7.2 In light of the narrow scope and content of this Addendum, the required 'Evaluation of Mitigation Measures' will be carried out as part of the further SA assessment in relation to the Main Modifications of the Local Plan.

**SA Objective: SA1 - To promote the efficient use of land, minimise the loss of undeveloped land, optimise the use of previously developed land (PDL), buildings and existing infrastructure and protect the most valuable agricultural land.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Loss of Greenfield land	CC1, CC2, CC5, CC6, CC13, <b>DRAFT</b> SS1, SS2, SS3, HC7, ENV 1, ENV 2, ENV8, HOU1, HOU3, HOU4, <b>DRAFT</b> HOU5, HOU6, HOU7, E2, E3, E4, E6, E7, E9	Negative	District Wide	Long term	Permanent	Certain
<b>Assessment:</b> The NPPF requires Local Plans to include a target for the number of homes planned and to clearly explain how the Plan will deliver at least this amount. Within North Norfolk, there is a limited amount of previously developed land, meaning that the majority of development across the District will result in the loss of greenfield land. For development on agricultural land, Local Plans must have regard to the NPPF requirement to recognise the benefits of the best and most versatile agricultural land (NPPF, 2021 para. 174 p. 50). In respect of efficiency, the NPPF requires that planning policies support development to make efficient use of land.						
<b>Mitigation Proposal:</b> The loss of greenfield land will be mitigated against by the allocating of sites for development in line with identified needs and locations. Each site allocation has undergone a detailed assessment, and the individual allocation policy identifies the appropriate minimum number of dwellings						

balancing the requirement for the efficient use of land whilst respecting the distinctive local character. Final policies and allocations should be reviewed to ensure that excessive land is not allocated, and density is optimised in relation to this Objective and account is taken of any surroundings and constraints.

**SA Objective: SA4 - To continue to reduce contributions to climate change and mitigate and adapt against it and its effects.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
The reduction of contributions to climate change is encouraged, as it the mitigation and adaptation against it and its effects	CC1, CC2, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC11, CC12, <b>DRAFT</b> SS1, HC2, HC7, ENV2, ENV3, ENV4, ENV5, ENV8, HOU1, E4, E6	Positive	District Wide	Long term	Permanent	Uncertain
<p><b>Assessment:</b> Climate change is recognised as a significant effect locally, nationally and globally. Climate change is a cross-cutting issue with the potential to have wide-reaching effects, including on biodiversity and flooding. As a low-lying District and coastal area, North Norfolk is particularly vulnerable to sea level changes. In respect of climate change, the NPPF requires planning to mitigate and adapt to climate change, including moving to a low carbon economy. Through the Norfolk Strategic Framework, Norfolk authorities have identified climate change as being a strategic land use issue with cross boundary implications and have agreed to reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change, including by locating development so as to reduce the need to travel, effecting a major shift away from car use, maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources and managing and mitigating against the risks of adverse sea level rise and flooding. Through the Duty to Cooperate, NNDC has worked with other authorities to produce Strategic Flood Risk Assessment, which assesses the extent of flooding taking into account climate change allowances as agreed with the Environment Agency.</p>						
<p><b>Mitigation Proposal:</b> The Local Plan includes policies reflecting the presumption in favour of climate resilient sustainable development. Development is generally directed to being in and close to the towns and larger villages, where services can be found and access to public transport obtained. Although there are policies that seek to support growth in more rural locations for social and economic benefits, the negative impacts around increased reliance on private car use and Green field sites will be minimised, as only limited small scale growth is envisaged. Throughout the Plan there are policies encouraging renewable energy, managing flood risk, including the assessment of surface water, coastal erosion, groundwater run-off and potentially incorporating Sustainable Urban Drainage systems. In addition, specific policies promote sustainable transport, support the transition from carbon based vehicles to electric power and promote increased connectivity and open space provision, along with ensuring biodiversity and geodiversity remain important considerations in the development process. There are specific policies included on green infrastructure, open space, water efficiency, sustainable construction, energy efficiency and low carbon energy. It is recognised that development could lead to additional cars and emissions, but the approach taken in the Local Plan is to reduce contributions to climate change and to mitigate and adapt to its effects.</p>						

**SA Objective: SA5 - To minimise pollution and to remediate contaminated land.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Pollution is minimised and contaminated land is remediated	CC1, CC2, CC5, CC6, CC9, CC13, <b>DRAFT</b> SS1, HC4, HC7, E2, E6, E7, E8	Positive	District Wide	Long term	Permanent	Uncertain
<b>Assessment:</b> The NPPF requires planning to minimise pollution, including preventing new and existing development from contributing to, being at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution. Furthermore, contaminated land should be remediated and mitigated where appropriate (NPPF, 2021, para. 174 p.50). In terms of air quality, North Norfolk currently meets all of the national air quality objectives. In terms of water pollution, by 2019, 5 out of 6 of the district's water bodies were rated as moderate for ecological status or potential and all 6 were rated good for chemical status (EA, 2019). The majority of the district is within an area designated as being at risk from agricultural nitrate pollution.						
<b>Mitigation Proposal:</b> As well as proposing a policy directly relating to pollution and hazard prevention and minimisation, which requires all development proposals to avoid, minimise and take every opportunity to reduce through mitigation measures, all emissions and other forms of pollution, the Local Plan also proposes a number of other policies, which would contribute towards this Objective, including encouraging sustainable development, directing development in or close to towns and larger villages, encouraging renewable energy, reducing the need to travel and maximising the use of sustainable transport. It is recognised that development could lead to additional cars and emissions, but the approach taken in the Local Plan seeks to avoid, prevent and minimise pollution when schemes come forward. The significant proportion of the planned growth relate to allocated sites, which are located in the larger settlements.						

**SA Objective: SA7 - To increase the provision of green infrastructure.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
The number of sites which contribute to GI within the District.	CC1, CC7, CC9, CC10, CC11, CC12, <b>DRAFT</b> SS1, SS2, SS3, HC2, HC4, HC8, ENV2, ENV4, ENV5, ENV8, HOU1, E4	Positive	District wide	Long term	Permanent	Uncertain
<b>Assessment:</b> Through the NSF, Norfolk authorities have identified GI as being a strategic land use issue with cross boundary implications. This has culminated in the Green Infrastructure and a Recreation Avoidance Strategy (GIRAMS). New development has the potential to provide and enhance GI. Many policies						

collectively are seeking enhanced provision, which will improve connectivity across the District and Policy CC11 has been designed specifically to ensure that all development delivers GI through the Plan.
<b>Mitigation Proposal:</b> As well as proposing a policy directly relating to the safeguarding, retention and enhancement of the GI network, the Local Plan proposes the inclusion of a number of other policies that seek to protect and provide GI. This includes policy HC2, which has been informed by the Norfolk Green Infrastructure and Recreational Avoidance Mitigation Strategy (GIRAMS). As part of the North Norfolk Open Space Assessment (2019), an open space calculator was created to calculate the quantum of on-site open space to be provided, based on the number of bedrooms proposed by a residential development. In addition, large scale residential development will be required to provide additional enhanced GI order to assist in recreational mitigation measures and compliance to Habitat Regulations.

**SA Objective: SA8 - To protect, manage and where possible enhance the special qualities of the areas' landscapes, townscapes and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
New development maintains and strengthens the local distinctiveness and the sense of place of the landscape, townscape and seascape	CC1, CC2, CC6, CC11, CC12, SS3, HC2, HC6, ENV1, ENV2, ENV3, ENV4, ENV5, ENV8, ENV7, HOU1, <b>DRAFT</b> HOU5, HOU6, HOU7, E2, E4, E5, E6, E7, E8, E9	Positive	District Wide	Medium to long term	Permeant	Uncertain
<b>Assessment:</b> North Norfolk is considered to be outstanding in a national context for both its geology and its landforms. The importance of the District's landscape has been assessed through a Landscape Character Assessment SPD (2021) and a Landscape Sensitivity Assessment SPD (2021). In addition, a number of Conservation Areas have Conservation Area Appraisal documents and there is a review programme being carried out to complete and adopt more.						
<b>Mitigation Proposal:</b> Many of the policies proposed within the Local Plan contribute towards this Objective, including requiring that the natural character and beauty of the AONB and the Broads National Park is conserved and enhanced, the protection and enhancement of landscape and settlement character, limiting development in the Heritage and Undeveloped Coast, protecting certain trees, hedgerows and woodland, encouraging the creation, enhancement and protection of open space and the protection of Local Green Space, the protection, enhancement and promotion of Public Rights of Way, encouraging high quality design and protecting and enhancing the historic environment. Overall, these policies require developers to consider the impacts and address environmental impacts positively and help to mitigate against proposals, which could harm the areas' landscapes, townscapes and seascapes.						

**SA Objective: SA10 - To maintain and improve the quality of where people live and the quality of life of the population by promoting healthy lifestyles and access to services, facilities and opportunities that promote engagement and a healthy lifestyle (including open space), including reducing deprivation and inequality.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Directing the majority of the new housing growth to the most sustainable settlements to ensure that new residents have access to services and also to support those existing services. Maximising opportunities to promote healthy lifestyles.	CC1, CC3, CC4, CC5, CC6, CC7, CC8, CC9, CC11, CC12, CC13, <b>DRAFT</b> SS1, SS2, SS3, HC1, HC2, HC3, HC4, HC5, HC6, HC7, HC8, ENV2, ENV3, ENV4, ENV5, ENV6, ENV8, HOU1, HOU2, HOU3, HOU4, <b>DRAFT</b> HOU5, HOU6, HOU7, HOU8, HOU9, E1, E2, E3, E4, E7, E8, E9	Positive	District wide	Medium – Long Term	Permanent	Uncertain
<p><b>Assessment:</b> New development has the potential to impact upon the health and wellbeing of the population in a number of different ways. There are many opportunities through new development to deliver increases in public open space, cycle parking and increased access to green infrastructure networks. Although new development may have an impact upon the capacity at schools and doctor's surgeries, the Local Plan provides the opportunity for investment to be aligned with proposed growth to ensure that new facilities and services are provided to meet the needs of the new and existing residents.</p> <p><b>Mitigation Proposal:</b> Central to the Local Plan is ensuring that the population has good access to essential services and facilities. In general, this takes the form of promoting significant development in areas that have existing services but can also include requiring provision to be made for those services in response to new development. This can be sought through developer contributions as set out in policy in the Local Plan. Therefore, the significance of this effect is relatively high and essential to improving people's health and wellbeing across the district. The emerging Local Plan seeks to ensure that open space is provided on all new major development and seeks to improve connectivity to these open spaces through a Green Infrastructure Policy and Strategy.</p>						

**SA Objective: SA11 - To reduce crime and the fear of crime.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Reduction in crime and the fear of crime through design quality	SS3, HC5, ENV6, ENV8, <b>DRAFT</b> HOU5, E4	Positive	Local	Medium term	Permanent	Uncertain
<b>Assessment:</b> Whilst crime rates within North Norfolk are lower than Norfolk and England rates, crime rates are generally higher within the District's larger towns. The design of new development can play an important part in helping to reduce crime and the fear of crime within North Norfolk.						
<b>Mitigation Proposal:</b> The specific design policy and the North Norfolk Design Guide SPD reflect Secure by Design principles. Some of the principles include clearly defined private and public spaces, surveillance and overlooking of the public realm from new developments, ensuring that the street scene is overlooked by active frontages, where possible. These principles will help to ensure that new schemes can be delivered that conform to these principles, through the decision making process and thereby, help to reduce crime and the fear of crime.						

**SA Objective: SA12 - To ensure that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Contribution towards good quality housing (including affordable housing and housing for elderly)	CC1, CC3, CC6, CC7, CC9, <b>DRAFT</b> SS1, SS2, SS3, HC4, HC5, HC7, ENV1, ENV6, ENV8, HOU1, HOU2, HOU3, HOU4, <b>DRAFT</b> HOU5, HOU6, HOU7, HOU8, HOU9, E4	Positive	District wide	Long term	Permanent	Certain
<b>Assessment:</b> The Central Norfolk Housing Market Assessment has assessed the affordable housing requirement within North Norfolk, based on the level of need of the population within the housing market area. There are a number of policies within the Local Plan, which will have a positive impact on affordable						

housing provision, with all new major developments being expected to provide affordable housing. Some of the environmental policies have the potential to have a mixed impact on the achievement of this Objective as they restrict the area where new housing can be developed.
<b>Mitigation Proposal:</b> Policy HOU2 seeks to secure affordable housing on all residential developments of 6 or more dwellings. This has been reduced from the previous policy requirement of 11. This will help meet the affordable housing need identified through the Central Norfolk Strategic Housing Market Assessment. The Local Plan also allows for rural affordable exception sites, which have an important role in delivering affordable housing to areas outside of the locational strategy (the settlement hierarchy). There is an unknown potential impact arising from the development of small scale sites in relation to Small Growth Villages, arising from the larger profit margins for market housing over affordable dwellings. It is proposed that the delivery of rural exception sites is monitored to ensure that the delivery of these schemes within areas of identified need continues over the plan period.

**SA Objective: SA13 - To encourage sustainable economic development and education/skills training covering a range of sectors and skill levels to improve employment opportunities for residents.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Employment opportunities of residents improved through sustainable economic development and education/skills training	CC1, CC8, CC13, <b>DRAFT</b> SS1, SS2, SS3, HC5, HC6, HC7, HC8, ENV2, ENV4, HOU1, HOU2, HOU7, HOU8, E1, E2, E3, E4, E6, E7, E8, E9	Positive	District Wide	Medium-Long Term	Permanent	Uncertain
<b>Assessment:</b> The NPPF states that planning policies should help create the conditions in which businesses can invest, expand and adapt. The NPPF emphasises the importance of setting a clear economic vision and strategy that positively and proactively encourages sustainable economic growth, including supporting a prosperous rural economy. The Business Growth and Investment Opportunities Study (2015) identified areas for potential opportunity within the District and the key findings of this study fed into the Employment Background Paper (2019). This Background Paper underpins the policies within the Local Plan by taking account of past take up rates in order to establish the employment land requirement within the District over the plan period. The policies within the plan have a positive effect in promoting employment opportunities for residents within the District.						
<b>Mitigation Proposal:</b> The policies within the Local Plan seek to ensure that Employment Areas are protected for employment use, a total of 271.34 hectares. New employment land is proposed through allocations in a number of sustainable locations within the District. Policies within the plan also allow for the development of employment opportunities within rural areas to ensure that employment opportunities are available to all within the District. New residential development is primarily directed towards the most sustainable settlements with employment land or good transport links to higher order settlements. This will ensure that the majority of the population of the District have access to employment opportunities and education/skills training.						



**SA Objective: SA14 - To encourage investment.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
To encourage investment within North Norfolk	CC2, CC6, CC8, CC9, CC11, <b>DRAFT</b> SS1, SS2, SS3, HC3, HC4, HC5, HC6, HC8, ENV3, ENV8, HOU1, HOU2, HOU7, HOU8, E1, E2, E3, E4, E6, E7, E8, E9	Positive	District Wide	Medium-Long Term	Permanent	Uncertain
<p><b>Assessment:</b> The NPPF sets out that planning policies should help create the conditions in which business can invest, expand and adapt. As the District is largely rural in nature, investment opportunities are encouraged through creating the opportunities for new housing, employment, retail and tourist facilities.</p> <p><b>Mitigation Proposal:</b> The housing policies seek to meet the required housing need of the district, encouraging people to live within the District. The economic policies seek to retain Employment Areas for employment uses and the plan promotes new employment land in sustainable locations across the District, offering the platform for investment in the District. The policies in regard to new employment are considered to be flexible to ensure that new employment development can be delivered in the main towns and rural areas, to ensure that investment is promoted District wide. The retail policies within the plan encourage opportunities for investment in the Town Centres of the main market towns within the district. Tourism is vital to the district's economy and new tourism opportunities are supported through policies within the plan. Take up rates of housing, employment, retail and tourism are to be monitored to ensure that the approach maximises the opportunities for investment.</p>						

**SA Objective: SA15 - To maintain and enhance town centres.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
Town centres are maintained and enhanced	CC11, <b>DRAFT</b> SS1, HC3, HC6, HC7, HC8, ENV2, ENV6, ENV7, ENV8, HOU1, E1, E2, E4, E5	Positive	Local	Medium Term	Permanent	Uncertain
<p><b>Assessment:</b> The district's seven Market towns and the large village of Hoveton all contain town centres that provide a different range of shopping, leisure and service provision to residents of the surrounding rural communities. High streets and town centres face a significant challenge with the rise of online shopping,</p>						

the continued squeeze on disposable incomes and shop closures by national retail service providers. The NPPF places great emphasis on the role that residential development can play in ensuring the vitality of centres and to ensure that Main Town Centre Uses are directed towards the Primary Shopping Areas, where possible. The North Norfolk Retail and Main Town Centre Uses Study 2017 sets out the hierarchy of town centres within North Norfolk and provides a detailed qualitative and quantitative assessment to establish the capacity to support retail floorspace growth. The North Norfolk Employment Growth Study background paper establishes a hierarchy of employment sites within the district. Maintaining and enhancing town centres also relates to aesthetics and urban design principles, making the town centres places that people want to spend time.

**Mitigation Proposal:** The Local Plan establishes a settlement and retail hierarchy which ensures that the majority of the housing growth, retail growth and employment growth is directed towards the Market Towns and the large village of Hoveton. The majority of new housing is promoted directly through housing allocations to the Market Towns as the most sustainable settlements. Housing Policies are supportive of new development in the main towns within the district. Employment policies are supportive of employment development on Employment Areas within the towns and the plan seeks to promote new employment land to the market towns. Retail policies are supportive of new development that enhances the vitality and viability of the town centres and sets out a clear hierarchy of Towns within the District. The town centres are defined and Main Town Centre Uses are directed, in the first instance, towards the Primary Shopping Areas. The design policies within the Local Plan seek to ensure that any new development will maintain and enhance the aesthetics of the town centres.

**SA Objective: SA16 - To reduce the need to travel and to promote the use of sustainable transport.**

Effect	Policy	Positive/ Negative	Spatial Effect	Duration (short/medium/Long term)	Temporary / permanent	Probability of occurrence
New development is located in the most sustainable locations, maximising the opportunities for the use of sustainable transport options.	CC9, <b>DRAFT</b> SS1, SS2, SS3, HC3, HC5, HC6, HC7, HC8, ENV1, HOU1, HOU3, HOU7, E1, E4, E6, E7, E8	Positive	District Wide	Medium	Permanent	Uncertain
<b>Assessment:</b> North Norfolk is a relatively peripheral, rural district, with a low population density and an aging population. The majority of the population live in the seven Market Towns within the district. Much of the existing economic travel demand is seasonal and tourism related. Public transport use is limited (2% of commuting trips). The NPPF (2021) promotes sustainable transport, setting out that significant development should be focused on locations, which are or can be made sustainable. To ensure that development is promoted to the most sustainable locations, North Norfolk District Council has produced a Distribution of Growth Background Paper, which identifies the most sustainable settlements within the district.						

**Mitigation Proposal:** The settlement hierarchy as defined within the Local Plan seeks to ensure that the majority of the growth proposed is directed towards the most sustainable settlements i.e. those with the most services and facilities. The majority is focused on the top two tiers of the hierarchy. The Plan as a whole promotes connectivity and access to open space.

## Appendix A – Appraisal of Draft Policies

### Draft Policy SS 1 Spatial Strategy

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
Policy Approach SS 1 taking account of proposed 10 additional SGVs and 9% Indicative Housing Allowance	0	0	0	+	+	+	+	+	+	+	0	+	+	+	++	+
Policy Approach SS 1 (Regulation 19)	0	0	0	+	+	+	+	+	+	+	0	+	+	+	++	+
<p>Comment: The updated draft policy approach sees the distribution of growth focussed on those settlements that provide the broadest range of access to day-to-day services and facilities across the district and as such, scores positively in relation to the economic indicators. By directing the majority of growth to the largest towns the approach sees the optimisation of existing infrastructure and allows providers to plan in the most efficient ways. These locations have high levels of affordable housing need and are the most accessible through a variety of transport modes, with the potential of reducing the districts reliance on the private car and offering the best growth to support public transport. The approach ensures that small scale development is supported in many small growth villages across the district to allow them to prosper and thrive. The approach scores well against the environmental considerations as the focused growth pattern will help preserve the rural character of the district. However, the approach scores less well in relation to use of PDL, as development would need to rely on the use of greenfield land. Alternative approaches around dispersed growth and/or through the creation of new settlements, places more reliance on lower order settlements with unsustainable travel patterns and where there would be a likely increase on the reliance of services and jobs elsewhere.</p>																
SA objective	Effect	Timescale ST/MT/LT	Permanence T/P	Comments												
1. To promote the efficient use of land, minimise the loss of undeveloped land, optimise the use of previously developed land (PDL), buildings and existing infrastructure and protect the most valuable agricultural land.	0	LT	P	<p>The approach concentrates the majority of the growth into defined large growth towns and then small growth towns followed by (to a lesser extent) 4 large growth villages. As such, development is directed to the most appropriate land and by minimising the loss of undeveloped land and keeping sites close to existing settlement boundaries. The majority of development will be on greenfield land, due to the limited opportunities for large scale growth on brownfield sites across the district. The number of Small Growth Villages identified would increase from 23 (currently listed in the policy) to 33, which would have the opportunity to deliver proportionate small scale growth of an increased allowance of 9%. Along with windfall development these sites will be a mix of brownfield and greenfield. However, there is limited PDL within North Norfolk, which means that the majority of development will likely require the use of undeveloped land. As such, the objective is scored as having a neutral effect.</p>												

2. To minimise waste generation and avoid the sterilisation of mineral resources.	0	LT	P	Development will increase the production of waste. Through the concentration and coordination of plan led growth with the vast majority of development plan led, waste should be kept to a minimum and mineral locations avoided.
3. To limit water consumption to the capacity of natural processes and storage systems and to maintain and enhance water quality and quantity.	0	LT	P	All new development will have an impact on water consumption. The policy will have a long term impact on water supply as it allocates for growth and facilitates demand in an area of water stress. The locational strategy has been informed by Anglian Water resource capacity and the Water Resource Management Plan and seeks to direct the majority of growth to existing urban areas where there is existing head room. Although the management plan confirms there is sufficient resource to meet anticipated growth, the plan outlines that investment is required to ensure supply continues through the plan period. The specific impacts are dependent on a number of parameters, not least the effective use and management of available resources, WWT capacity, network capacity and associated investment and the requirement to upgrade wider facilities in some settlements in order to address environmental concerns. Site specific factors and the design and landscaping proposed will also be important in ensuring compatibility with this objective.
4. To continue to reduce contributions to climate change and mitigate and adapt against it and its effects.	+	LT	P	The locational strategy has been prepared with regard to a number of parameters and constraints including the SFRA incorporating climate change allowances and Anglian Water Management Plan. The majority of growth is directed at existing settlements and site selection directs preferred sites to areas of low risk from all sources of flooding. The main urban areas are the better connected in relation to public transport and as such, offers the best chance of promoting sustainable transport options and climate change resilience.
5. To minimise pollution and to remediate contaminated land.	+	MT	P	By directing growth to the main areas and supporting Infill development in the main the policy scores positively against this objective.
6. To protect and enhance the areas' biodiversity and	+	ST	P	Compatibility with this objective will be largely dependent on specific site

geodiversity assets (protected and unprotected species and designated and non-designated sites).				allocations. However, the need to deliver a significant volume of dwellings to meet housing requirements, in accordance with the spatial strategy, will mean pressure on both urban brownfield sites and peripheral greenfield sites that have biodiversity value. The approach, however, concentrates the majority of new development in areas where there is already existing built form and as a result, less impacts are anticipated on the wider biodiversity of the district. Fewer and larger sites provide the opportunity for substantial on-site recreational provision, which will assist in minimising the impacts of growth on the coastal European sites.
7. To increase the provision of green infrastructure.	+	MT	P	By directing significant growth to larger sites and the fringes of larger settlements there is an increased opportunity to enhance and deliver new GI. The impact and contributions to GI provision of the other settlements will depend on the future identification of opportunities, and the scale of development.
8. To protect, manage and where possible enhance the special qualities of the areas' landscapes, townscapes and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place.	+	MT	P	The locational strategy has been informed by the Landscape Character Assessment SPD (2018) and has taken into account the valued features of each landscape type. The two larger growth towns where the preferred option directs growth to, are identified as having greater capacity to accommodate growth without detrimental environmental impact. The policy approach also ensures that where sustainable growth options are available, major development will not be permitted within the AONB.
9. To protect, manage and where possible enhance the historic environment and their settings including addressing heritage at risk.	+	MT	P	The historic environment often includes the core areas of town centres and wider conservation areas, as well as many rural buildings such as churches. The approach directs growth mainly to the fringes of the larger settlements. Impacts on historic town centres and listed buildings are site specific and have been considered through undertaking Historic Impact assessments for each site allocation in order to reduce and mitigate any identified impact to the historic environment. This approach concludes that the majority of growth can be delivered without significant harm.

10. To maintain and improve the quality of where people live and the quality of life of the population by promoting healthy lifestyles and access to services, facilities and opportunities that promote engagement and a healthy lifestyle (including open space), including reducing deprivation and inequality.	+	LT	P	The policy approach sees the main growth directed towards the most sustainable locations in terms of access to services and as such, provides the opportunity to support and enhance service provision. At the same time it seeks to provide for proportionate small scale growth in small growth villages reflecting the rural nature of the District.
11. To reduce crime and the fear of crime.	0	ST-LT	P	Such design requirements will need to be assessed through the planning application process.
12. To ensure that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs.	+	ST	P	The policy seeks to provide new housing across the district in the most sustainable locations. The approach includes allocation of sites in small growth villages of high enough numbers to enable a proportion of affordable housing to be provided on site in each location.
13. To encourage sustainable economic development and education/skills training covering a range of sectors and skill levels to improve employment opportunities for residents.	+	MT	P	By directing all growth and addressing the identified needs, the approach seeks to provide for the residential needs of the district. By locating growth in the larger towns and seeking small scale growth in the settlements with small scale services the approach is supportive of employment development and provides easy access to education – secondary in the first two tiers and primary in the majority of the large and small growth villages.
14. To encourage investment.	+	ST	P	The policy approach directs growth and hence investment into selected settlements. As such, it encourages more sustained investment into the larger towns in order to provide infrastructure improvements and support local services.
15. To maintain and enhance town centres.	++	MT	P	The approach is based on service provision. By directing growth to the larger towns the approach is seeking to support the town centres. Smaller scale growth directed at locations with services helps sustain local services.
16. To reduce the need to travel and to promote the use of sustainable transport.	+	MT	P	The policy directs significant growth to the settlements that support public transport. Growth in the lower order settlements is less served by public transport and combined with the rural locations will lead to more reliance on the private car. The effect however remains positive as the substantial

			growth will support the existing public transport routes.
Potential Mitigation Measures: The policy approach scores well against the relevant criteria. As such, no mitigation measures are identified.			

## Draft Policy HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation

	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15	SA 16
Policy Approach HOU 5 (with updated evidence and supporting text)	-	n/a	0	0	?	?	n/a	+	?	+	+	+	n/a	+	n/a	0
Policy Approach HOU 5 (Regulation 19)	-	n/a	0	0	?	?	n/a	+	?	+	+	+	n/a	+	n/a	0

Comment: The policy approach scores well against the relevant social objectives. The updated approach is informed by the revised evidence of the North Norfolk Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment (September 2024), which identifies a need for a total of 11 pitches over the revised plan period. This along with the use of a criteria base for the assessment of applications, provides the necessary flexibility for families and remains appropriate to address the identified needs in North Norfolk. In addition, the updated criteria ensures that any sites are well related to services and proposals minimise adverse effects and that the potential loss of existing sites would need to be appropriately justified.

SA objective	Effect	Timescale ST/MT/LT	Permanence T/P	Comments
1. To promote the efficient use of land, minimise the loss of undeveloped land, optimise the use of previously developed land (PDL), buildings and existing infrastructure and protect the most valuable agricultural land.	-	ST	P	The draft policy directs growth to sites outside settlement boundaries. These will principally be greenfield in nature.
2. To minimise waste generation and avoid the sterilisation of mineral resources.	N/A	N/A	N/A	
3. To limit water consumption to the capacity of natural processes and storage systems and to maintain and enhance water quality and quantity.	0	MT	P	The location and type of site, whether it be for an individual family or a transit use will be specific to each application.
4. To continue to reduce contributions to climate change and mitigate and adapt against it and its effects.	0	N/A	N/A	Compatibility with this objective will depend on location. New sites on the edge of settlements are likely to increase reliance on cars and greenfield gas emissions. The level of impact will depend on the number of sites and locations.
5. To minimise pollution and to remediate contaminated land.	?	MT	P	All new sites will create some pollution. The policy allows development on PDL as well as greenfield. The effects are uncertain.



6. To protect and enhance the areas' biodiversity and geodiversity assets (protected and unprotected species and designated and non-designated sites).	?	N/A	P	The exact impact depends on the location of any new site. The proposed policy does not make specific reference to biodiversity or geodiversity considerations and as such, the impacts are uncertain.
7. To increase the provision of green infrastructure.	N/A	N/A	N/A	
8. To protect, manage and where possible enhance the special qualities of the areas' landscapes, townscapes and seascapes (designated and non-designated) and their settings, maintaining and strengthening local distinctiveness and sense of place.	+	MT	P	The policy refers to the need to minimise landscape impacts. The impact will be site specific.
9. To protect, manage and where possible enhance the historic environment and their settings including addressing heritage at risk.	?	MT	P	The policy approach makes no reference to the consideration of historic environment.
10. To maintain and improve the quality of where people live and the quality of life of the population by promoting healthy lifestyles and access to services, facilities and opportunities that promote engagement and a healthy lifestyle (including open space), including reducing deprivation and inequality.	+	ST-MT	P	The draft policy sets a specific need of at least 11 pitches to address the specific needs of Gypsies and Travellers within the district, as well as including a criteria base to ensure planning applications considered on a case by case basis. The approach supports the consideration of neighbours and amenity.
11. To reduce crime and the fear of crime.	+	MT	P	Providing for adequate provision of sites should limit the need and occurrence of unauthorised encampments. As such the policy scores positive against this objective.
12. To ensure that everyone has the opportunity of a good quality, suitable and affordable home to meet their needs.	+	MT	P	The policy is supportive of applicants seeking to address their own needs through the application process. As such a clear policy direction is provided to ensure all groups have access to appropriate housing to meet their needs. The approach allows for the expansion of existing sites and or modest growth to address newly arising needs at a point in time.
13. To encourage sustainable economic development and education/skills training covering a range of sectors and skill levels to improve	N/A	N/A	N/A	

employment opportunities for residents.				
14. To encourage investment.	+	MT	P	The policy approach provides the framework for appropriate investment.
15. To maintain and enhance town centres.	N/A	N/A	N/A	
16. To reduce the need to travel and to promote the use of sustainable transport.	0	N/A	N/A	The policy steers appropriate development to locations outside, but closely related to settlements, and as such is likely to encourage reliance on private vehicle use. The effects are likely to be neutral given the nomadic preferences of this group.
Potential Mitigation Measures: The policy approach scores well against the relevant social objectives and as such, there is no requirement for any mitigation. The approach takes into consideration local circumstances and the nature and specific minimum level of need over the plan period, while allowing flexibility for more proposals to come forward and by setting a criteria based approach for the assessment of applications ensuring that sites are identified in sustainable locations that are related to services and that proposals minimise adverse highway and landscape impacts.				

## Appendix B - Appraisal of Draft Additional Site Proposals – Preferred Options

### Blakeney

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
BLA01/B	Blakeney	Residential	-	++	+	++	0	-	0	-	0	+	+	++	0	0	+	0
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>neutral</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; immediately adjacent SSSI (Wiveton Downs), close proximity to SSSI, SPA, SAC &amp; RAMSAR (North Norfolk Coast), National Nature Reserve (Blakeney) and local geodiversity sites (North Norfolk Coast &amp; Wiveton Downs), within Norfolk Coast National Landscape arable land with mature hedgerow / trees to majority of boundaries. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service and primary education facilities, limited leisure and cultural opportunities, public transport links mainly rely on Coastal Hopper.</p> <p><b>Economic</b> – Scores neutral; edge of settlement, some access to employment, educational facilities, services / facilities. High speed broadband in vicinity, limited transport links. Could support local services.</p>																	

### Briston

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
BRI02/C	Briston	Residential	-	++	+	++	0	-	0	-	0	+	+	++	0	0	+	+
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity CWS (Briston Gorse), arable land, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, primary education facilities, peak time public transport links and limited leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores mixed; edge of settlement, some access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Could support local services.</p>																	

## Cromer

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
C10/1	Cromer	Residential	-	++	++	++	0	-	?	-	0	+	+	++	+	0	++	+
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Potential negative biodiversity impact; adjacent AONB, close proximity CWSs (Cromer Sea Front, Hall Wood &amp; Cromer Old Cemetery), SSSI &amp; local geodiversity site (East Runton Cliffs), scrub, dry grassland. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, leisure and cultural opportunities, access to local healthcare service, education facilities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
C22/4	Cromer	Residential	-	++	+	++	0	-	?	--	-	+	+	++	+	0	++	+
<b>Overall Conclusion</b>	<p>Overall, the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> - Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential to affect setting of Grade II Listed Building (Pine Tree Farmhouse). Potential for remediation of contamination. Potential negative biodiversity impact; within National Landscape, arable, mature trees / hedgerow to boundaries, adjacent woodland. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, access to leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to educational facilities, transport links, access to employment, services / facilities. High speed broadband in vicinity. Town centre accessible from the site.</p>																	

## Hoveton

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
HV01/C	Hoveton	Residential	-	++	+	++	0	?	?	-	0	++	+	++	++	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Biodiversity impact uncertain; arable, mature hedgerow / trees to majority of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
HV06/A	Hoveton	Residential	-	++	+	++	0	?	0	-	0	++	+	++	++	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

## Ludham

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
LUD01/C	Ludham	Residential	-	++	+	++	0	?	0	-	0	0	+	++	0	0	+	0
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, mostly within FZ1, FZ2 touches part east boundary, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity The Broads, arable, mature hedgerow / trees to some boundaries. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores neutral; edge of settlement, good access to local healthcare service and primary education facilities, limited leisure and cultural opportunities and limited peak time public transport links.</p> <p><b>Economic</b> – Scores mixed; edge of settlement, good access to services / facilities, some access to employment, educational facilities. High speed broadband in vicinity, limited transport links. Could support local services.</p>																	

## Mundesley

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
MUN03/A	Mundesley	Residential	-	++	~	~	+	-	0	-	-	~	+	++	+	0	+	+
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Adjacent CERZ (northern boundary). Potential to affect setting of Grade II Listed Building (Church of All Saints) and CA. Potential for remediation of contamination. Potential negative biodiversity impact; close proximity CWS (Mundesley Cliffs), arable / grazing land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores mixed; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, some leisure and cultural opportunities. Could result in loss of designated open land area.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment and transport links and to some educational facilities and other services / facilities. Access to high speed broadband uncertain. Could support local services.</p>																	

## North Walsham

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
NW16	North Walsham	Residential	-	++	~	++	0	-	?	-	-	++	+	++	+	0	++	+
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>negative and positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low / low to moderate susceptibility GWF, small area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (The Thatched Cottage). Potential negative biodiversity impact; includes a short section of CWS (Paston Way &amp; Knapton Cutting), arable, mature trees / hedgerow to majority of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

## Stalham

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
ST04/A	Stalham	Residential	-	++	~	~	0	?	0	-	0	++	+	++	+	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, approximately 1/6 of site potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
ST19/B	Stalham	Residential	-	++	+	++	0	?	?	-	0	++	+	++	+	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to peak time public transport links, local healthcare service, education facilities, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	



## Appendix C - Appraisal of Alternative Site Options

### Cromer

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
C19/2	Cromer	Residential	-	++	+	++	0	-	?	-	0	+	+	++	+	0	++	+
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; within Norfolk Coast National Landscape, arable, mature trees / hedgerow to boundaries, adjacent woodland. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to education facilities, peak time public transport links, access to local healthcare service, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to educational facilities, transport links, access to employment, services / facilities. Access to high speed broadband uncertain. Town centre accessible from the site.</p>																	

### Fakenham

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
F05	Fakenham	Residential	++	++	+	++	+	+	0	+	0	++	+	++	++	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores positively; within settlement, PDL, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential for remediation of contamination (PDL). Potential townscape enhancement. Limited biodiversity impact; PDL mature trees / hedgerow to parts of boundary. No loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; within settlement, good access to peak time public transport links, local healthcare service, education facilities, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; within settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

## Hoveton

Site Ref	Settlement	Use	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15	SA16
HV05	Hoveton	Residential	-	++	+	++	0	-	+	-	-	++	+	++	++	0	++	++
<b>Overall Conclusion</b>	<p>Overall the site scores as <b>positive</b></p> <p><b>Environmental</b> – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential to affect setting of Grade II* Listed Building (Church of St John). Potential negative biodiversity impact; adjacent The Broads, arable surrounded by mature hedgerow / trees. Localised potential to contribute to GI network. Loss of agricultural (1-3) land.</p> <p><b>Social</b> – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p><b>Economic</b> – Scores positively; edge of settlement, good access to employment, educational facilities, transport links and services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>																	

## Appendix 6: Habitat Regulations Assessment Addendum



# North Norfolk Local Plan HRA Addendum relating to additional housing, October 2024

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## Summary

This report is an addendum to the North Norfolk Local Plan Habitats Regulations Assessment (HRA), Submission version originally produced by Footprint Ecology in 2021. Following initial examination hearings in early 2024, the Inspector's initial findings indicated the provision made by the submitted plan should be increased by at least 1000 dwellings. As a result of the Inspector's findings, the Council has identified additional housing sites that will be added to the Plan and the Council has also updated the settlement hierarchy (Policy SS1).

This report is intended to sit alongside the submission HRA report and considers the different allocations and revised hierarchy in terms of their implications for the HRA. As such this report provides the necessary detail to inform future consultation and hearings as part of the continued examination of the Plan. It is not an update of the submission HRA and is specific to the additional housing identified by the Council.

We have undertaken a preliminary screening of the additional allocations and the inclusion of additional settlements. This screening triggered a range of likely significant effects relating to recreation and water quality in particular, with risks for all allocations and settlements.

Strategic mitigation is in place for recreation through the established mitigation strategy (GIRAMS) and there is a requirement for nutrient neutrality in place for relevant sites, as well as a need for further project level HRA and more detailed consideration for some sites. It should therefore be possible for an updated HRA to rule out adverse effects on integrity, alone or in-combination, for the Plan with respect to all European sites.

At this point in time, it is anticipated that the additional allocations and settlements included in policy SS1 can be incorporated into the Plan without undermining the HRA work done to date and that the changes proposed will not materially change the overall findings of the submission HRA.

It is anticipated that the submission HRA will be updated alongside the final version of the Plan, including any further modifications or changes to the Plan required as the examination and further hearings progress. The HRA will be finalised at the point of adoption of the Plan. The final HRA will need to incorporate the findings from this (and a previous) addendum. In addition, the update should include reference to the latest work on the GIRAMS, the latest position on nutrient neutrality and the latest advice from Natural England.

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## Acknowledgements

This report has been commissioned by North Norfolk District Council and our thanks to Iain Withington and Chris Brown for providing the supporting information, background and useful comment.

## 1. Introduction

- 1.1 This report is an addendum to the North Norfolk Local Plan Habitats Regulations Assessment (HRA), Submission version originally produced by Footprint Ecology in 2021, (with a separate addendum in 2023 relating to a single policy CC13).
- 1.2 Following initial examination hearings in early 2024, the Inspector's initial findings<sup>1</sup> indicated he was not able to conclude that the plan met the objectively assessed housing needs of the district and that there was a shortfall of about 700 dwellings. Allowing for contingency, the findings indicate the provision made by the submitted plan should be increased by at least 1,000 dwellings.
- 1.3 As a result of the Inspector's findings, the Council has identified additional housing sites that will be added to the Plan and the Council has also updated the settlement hierarchy.
- 1.4 This report is intended to sit alongside the previous HRA report and considers the different allocations and revised hierarchy in terms of their implications for the HRA. As such this report provides the necessary detail to inform future consultation and hearings as part of the continued examination of the Plan.
- 1.5 The HRA has been updated at each stage of the Plan and will be finalised to accompany the Local Plan at adoption. The intention is that the HRA will be updated alongside any main modifications and at that point a complete, revised HRA report will be produced.
- 1.6 In the meantime, this document should be read in conjunction with the submission HRA [A4]. That document provides background and information on the HRA process, the North Norfolk Local Plan,

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<sup>1</sup> See post hearings letter, <https://www.north-norfolk.gov.uk/media/10490/eh006-f-inspectors-post-examination-hearings-letter.pdf>



relevant European sites, a complete screening of the submission version of the Local Plan and appropriate assessment.

## The additional allocations and site extensions

- 1.7 There are a total of 11 additional sites identified by the Council. Of these 11, six were included in the submission HRA but now have extensions proposed. All 11 new allocations are shown in Map 1 and listed in Table 1.

**Table 1: Allocations. Indicative number of dwellings is the combined total for the extensions.**

Site	Settlement	Type of site	Indicative number of dwellings
Site 1 C10-1	Cromer	New	70
Site 2 C22-4	Cromer	Extension of existing allocation	500
Site 3 NW16	North Walsham	New	330
Site 4 HV01C	Hoveton	Extension of existing allocation	150
Site 5 HV06A	Hoveton	New	50
Site 6 ST04A	Stalham	New	45
Site 7 ST19B	Stalham	Extension of existing allocation	150
Site 8 BLA01B	Blakeney	New	30
Site 9 BRI02C	Briston	Extension of existing allocation	90
Site 10 LUD01C	Ludham	Extension of existing allocation	60
Site 11 MUN03A	Mundesley	Extension of existing allocation	45

## Settlements

- 1.8 Alongside the additional allocations, an additional 10 villages have been added to the small growth village hierarchy (policy SS1). The policy approach has not changed from the submitted plan i.e. there are no allocations at this level but growth adjacent to the defined

settlement boundaries is permitted subject to certain requirements as set out in criteria 3 policy. The additional 10 villages and the indicative housing allowance for all small growth villages are listed in Table 2 and shown in Map 2. Note that for this tier in the hierarchy the level of growth is increased from 6% to 9%.

**Table 2: Amended Table showing Small Growth Villages Housing Apportionment. Green shaded rows highlight the 10 additional villages added to the hierarchy.**

Settlement (Parish)	Indicative Housing Allowance (September 2024)
Aldborough	22
Badersfield (Scottow)	35
Bacton	45
Beeston Regis	43
Binham	11
Catfield	39
Corpusty & Saxthorpe	29
East & West Runton	64
Erpingham	29
Felmingham	23
Great Ryburgh	26
Happisburgh	36
High Kelling	20
Horning	0
Itteringham	5
Langham	15
Little Snoring	24
Little Walsingham (Walsingham)	31
Northrepps	43
Overstrand	38
Potter Heigham	0
Roughton	37
Sculthorpe	28
Sea Palling	0
Southrepps	34
Stibbard	13
Sutton	46
Trunch	37
Tunstead	42
Walcott	0
Weybourne	20
Worstead	38
<b>Total Housing Delivery @ 9%</b>	<b>873</b>



**Legend**

North Norfolk District boundary

**Ramsar:**

- Breydon Water
- Broadland
- The Wash
- Great Yarmouth North Denes

**SPA:**

- Breckland
- Greater Wash
- N Norfolk Coast

**SAC:**

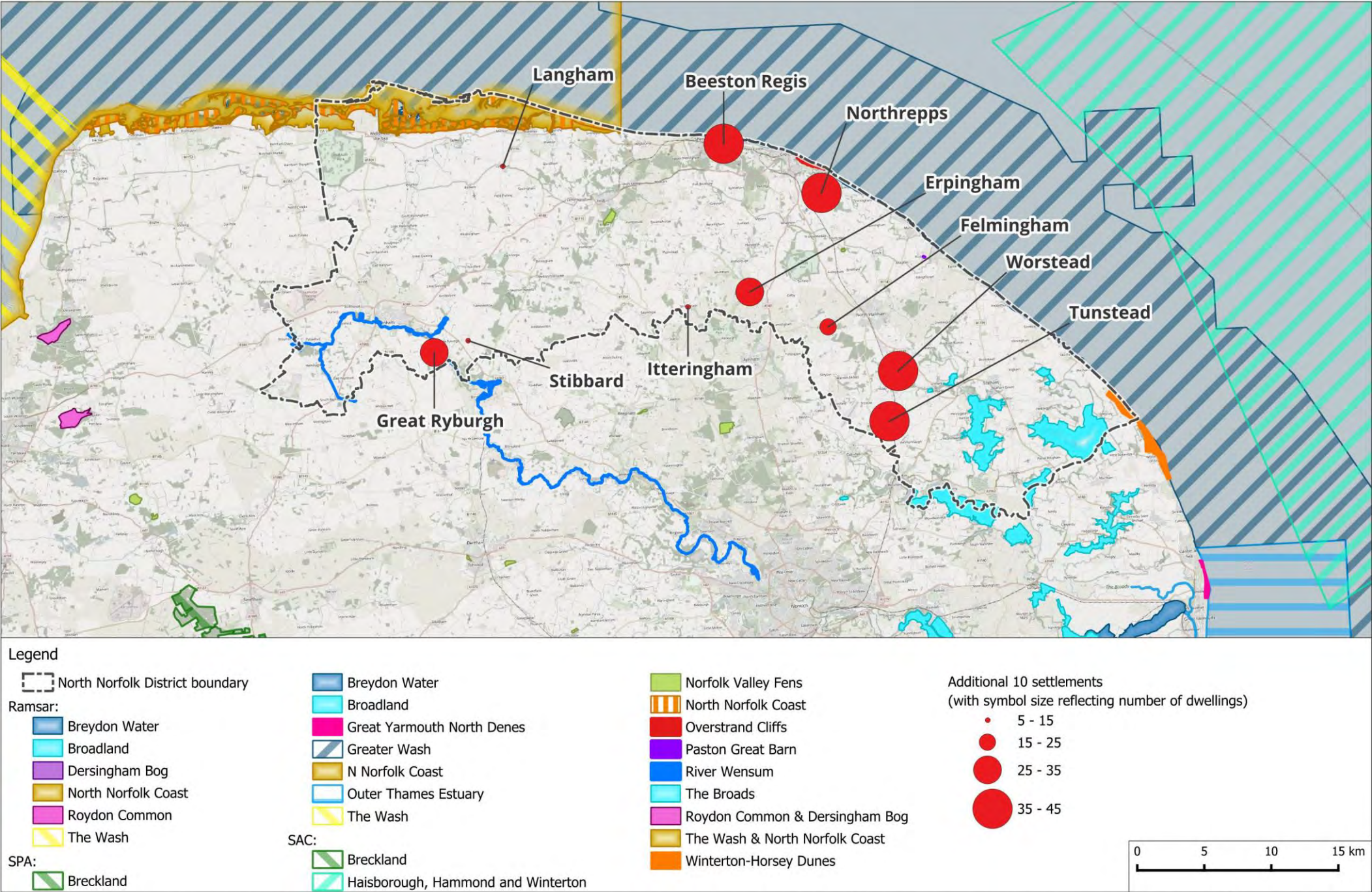
- Norfolk Valley Fens
- The Broads
- North Norfolk Coast
- Overstrand Cliffs
- Paston Great Barn
- Winterton-Horsey Dunes

Other features: Outer Thames Estuary, The Wash, Breydon Water, Broadland, The Wash, Great Yarmouth North Denes, Breckland, Haisborough, Hammond and Winterton, River Wensum, Roydon Common, The Wash & North Norfolk Coast, Paston Great Barn, Winterton-Horsey Dunes.

Scale: 0 5 10 15 km



Map 2: European sites and additional allocations (labelled).





## Initial screening

- 1.9 In the submission version HRA, the following impact pathways were identified as having the potential to result in likely significant effects:
- Loss of supporting habitat
  - General urban effects
  - Recreation
  - Hydrological impacts
  - Air quality
- 1.10 It should however be noted that in the screening of the submission version no likely significant effects were identified with respect to the loss of supporting habitat or air quality for any European site, alone or in-combination.
- 1.11 All 11 allocations and the additional settlements were checked using these bulleted pathways for the potential for likely significant effects for any European site, alone or in-combination.
- 1.12 Using GIS, we extracted the distance from each allocation to each European site (the closest distance from the nearest part of the respective boundary from each). GIS data with the boundaries of each allocation were provided by the Council. This distance matrix is provided in Appendix 1. We then used the following criteria to identify allocations where likely significant effects would be triggered or at least some further checks were required:
- Loss of supporting habitat: any allocation within 2km of the Broadland SPA/Ramsar or the North Norfolk Coast SPA/Ramsar. Any allocations falling within these areas were checked using aerial imagery to determine whether they had the potential to support wintering or passage waterbirds, for example that they could provide roost sites or foraging areas for swans, geese or similar.
  - General urban effects: any allocation falling within 400m of a European site boundary warranted further checks in GIS, here urban effects a potential risk to the site.
  - Recreation: all new residential development assumed to trigger likely significant effects in-combination in line with the GI RAMS and advice from Natural England; any allocation within 500m of a European site was reviewed in GIS to check for footpath links and direct access to European sites in case risks alone and also any site

allocated for more than 50 dwellings triggered likely significant effects alone, due to the scale of growth in one location, in line with the latest advice from Natural England.

- Hydrological issues: any allocation falling within the catchment of the Broads SAC/Broadland SPA/Ramsar or the River Wensum SAC triggered alone due to nutrient neutrality issues.

- 1.13 Similar checks were also made for the additional small growth villages added to the small growth village hierarchy (policy SS1).
- 1.14 Results from these checks and initial screening are given in Table 3 and Table 4. Risks for all impact pathways apart from air quality have been identified from the additional housing sites. For air quality, detailed checks were made as part of the submission version of the HRA and road sections within 200m of European sites were identified and mapped. All of these road sections are very short sections of road and checks of aerial photographs reveal that the proportion of the European site within 200m of the road is very low and the habitats present are not ones particularly vulnerable to air quality. Given the rural nature of these roads, and the dispersed nature of the allocations, likely significant effects were ruled out, alone or in-combination. This was checked at the time with Natural England who agreed with the assessment findings. The additional growth, dispersed so widely on the same road network does not result in a need to change this finding.
- 1.15 Having completed the screening, all allocations would trigger likely significant effects alone for at least one pathway, with the exception of MUN03A where likely significant effects are triggered in-combination only, for recreation. In addition, policy SS1 would remain screened in with likely significant effects alone due to the overall level of growth and distribution of growth set out in the policy.

**Table 3: Potential screening where allocation might trigger likely significant effects alone (a) or in-combination (ic). Total dwellings is the consolidated total.**

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
C10-1	70			a			<b>Recreation</b> within relative zones for: The Broads/ SAC/SPA/Ramsar; The Wash SPA/Ramsar, The Wash & North Norfolk Coast SAC, North Norfolk Coast SAC/SPA/Ramsar, Norfolk Valley Fens.
C22-4	500			a	a		<b>Recreation</b> within relative zones for: The Broads/ SAC/SPA/Ramsar; The Wash SPA/Ramsar, The Wash & North Norfolk Coast SAC, North Norfolk Coast SAC/SPA/Ramsar, Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; Norfolk Valley Fens. <b>Water:</b> Site within Broads catchment.
NW16	330			a	a		<b>Recreation</b> within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash SPA; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar. <b>Water:</b> Site within Broads catchment.



Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
HV01C	150			a	a		<p><b>Loss of supporting habitat:</b> Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site (on north edge of Hoveton) is between 2 roads and has housing on 3 sides. Unlikely foraging habitat for swans.</p> <p><b>Recreation</b> within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash &amp; North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens.</p> <p><b>Water:</b> Site within Broads catchment.</p>
HV06A	50			a	a		<p><b>Loss of supporting habitat:</b> Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site (on north edge of Hoveton) is alongside Stalham road and adjacent to existing housing. Unlikely foraging habitat for swans.</p> <p><b>Recreation</b> within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash &amp; North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens. Site is at the 50 dwelling threshold referred to in Natural England advice</p> <p><b>Water:</b> Site within Broads catchment.</p>
ST04	45			ic	a		<p><b>Loss of supporting habitat:</b> Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans.</p>

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
							<p><b>Recreation</b> within relative zones for: Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash &amp; North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar.</p> <p><b>Water:</b> Site within Broads catchment.</p>
ST19B	150			a	a		<p><b>Loss of supporting habitat:</b> Site is relatively close to Broadland SPA/Ramsar but checks of aerial photos indicate site unlikely foraging habitat for swans.</p> <p><b>Recreation:</b> Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash &amp; North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar.</p> <p><b>Water:</b> Site within Broads catchment.</p>
BLA01B	88			a			<p><b>Loss of supporting habitat:</b> Site close to North Norfolk Coast SPA/Ramsar but within Blakeney and largely surrounded by housing so no risks.</p> <p><b>General Urban Effects:</b> Within 200m of the Greater Wash SPA, The Wash &amp; North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar however set back enough that garden escapes are not likely to be an issue; main coast road and creeks etc act as barriers for cats and mean cats not a risk.</p>

Allocations	Total dwellings	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
							<b>Recreation</b> within relative zones for: The Wash SPA/Ramsar; The Wash & North Norfolk Coast SAC; North Norfolk Coast SPA/SAC/Ramsar; Norfolk Valley Fens SAC. Scale of growth and proximity means risks for coastal sites triggered alone.
BRI02C	90			a	a		<b>Recreation</b> within relative zones for: The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens. <b>Water:</b> Site within Broads catchment.
LUD01C	60			a	a		<b>Loss of supporting habitat:</b> Site on edge of Ludham village and surrounded on 3 sides by housing. No risks in relation to foraging habitat for swans. <b>Recreation:</b> within relative zones for Breydon Water SPA/Ramsar; The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar. <b>Water:</b> Site within Broads catchment.
MUN03A	45			ic			<b>Recreation:</b> within relative zones for The Broads/ SAC/SPA/Ramsar; Great Yarmouth Denes SPA; Winterton Horsey Dunes SAC; The Wash & North Norfolk Coast SAC; North Norfolk Coast SAC/SPA/Ramsar; Norfolk Valley Fens. .

**Table 4: Potential risks associated with different settlements**

Settlement (Parish)	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
Beeston Regis		✓	✓			General urban effects potentially relevant with respect to the Norfolk Valley Fens (Sheringham and Beeston Regis Commons SSSI component). Outside Broads catchment so no risks with respect to nutrient neutrality.
Erpingham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Felmingham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Great Ryburgh	✓	✓	✓	✓		Within River Wensum and Broads catchment (directly adjacent to River Wensum SAC) so risks with respect to nutrient neutrality. Potential risks from general urban effects and loss of supporting habitat due to proximity to River Wensum SAC.
Itteringham			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Langham			✓			Within relatively easy reach of North Norfolk Coast (Blakeney Harbour area) so significant growth here could trigger recreation concerns alone and a need for enhanced GI.

Settlement (Parish)	Loss of supporting habitat	General urban effects	Recreation	Water issues	Air quality	Comments
Northrepps			✓	?		Just outside catchment for Broads, however specific locations should be checked in relation to relevant WWTWs with respect to nutrient neutrality concerns.
Stibbard			✓	✓		Within River Wensum and Broads catchment (directly adjacent to River Wensum SAC) so risks with respect to nutrient neutrality.
Tunstead			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.
Worstead			✓	✓		Within Broads catchment so risks with respect to nutrient neutrality.

## **Appropriate assessment considerations and implications for the Plan**

- 1.16 Initial screening identified a range of impact pathways that are relevant and in particular a need that all the additional allocations will require appropriate assessment. The implications are considered below.

### **Recreation**

- 1.17 Recreation impacts are relevant for a wide range of European sites and this is a strategic issue across Norfolk. All the Norfolk local planning authorities have worked together, with advice from Natural England, to establish a county-wide strategic mitigation scheme in the form of GIRAMS. This scheme ensures mitigation for the in-combination effects of recreation from strategic housing growth, and recent updates (by Footprint Ecology in 2024) ensures the package of mitigation measures relates to the scale and distribution of growth coming forward. With the GIRAMS in place and secured in policy, it should be possible to conclude adverse effects on integrity, in-combination, are eliminated.
- 1.18 The most recent Natural England advice in relation to the GIRAMS recommends that large developments (above 50 dwellings) may trigger likely significant effects alone and additional mitigation in the form of enhanced green infrastructure may be necessary. To ensure compliance with this advice, policy wording should ensure that each large allocation secures sufficient and appropriate green infrastructure and that this is assessed through project level HRA.
- 1.19 Allocation BLA01B in Blakeney is particularly close to the North Norfolk Coast SAC/SPA/Ramsar and while the allocation is relatively small compared to some of the others, the proximity to the European site means there are particular risks at this location and project level HRA will be particularly important. There may be a need to secure particular local infrastructure or high quality green infrastructure to ensure adverse effects on integrity can be ruled out.

## **Water issues**

- 1.20 A number of the allocations and numerous settlements included in policy SS1 are within the catchment of the Broads or the River Wensum SAC. As such all development in these locations will need to secure nutrient neutrality.

## **Great Ryburgh**

- 1.21 Great Ryburgh is one of the additional 10 villages added to the small growth village hierarchy (policy SS1), with an indicative level of growth of 26 dwellings suggested. This village is directly adjacent to the River Wensum SAC and there is a risk that growth here will pose risks to the SAC simply by the proximity to the site, with issues such as run-off, garden escapes and loss of supporting habitat (e.g. for Desmoulin's Whorl Snail or the fish) if any aquatic or wetland habitats are affected. As the policy is high level and strategic these risks can only be considered and checked at project level HRA, once precise details of locations are available. They may not be relevant at all if development were to come forward in the western part of the village for example. As such, risks are addressed through the general European sites policy and the need for project level HRA, clearly set out in Policy ENV5 within the Plan.

## Conclusions

- 1.23 We have undertaken a preliminary screening of the additional allocations and the inclusion of additional settlements in policy SS1. This work has been undertaken to help inform further consultation and the implications of the changes to the Plan in terms of the existing HRA work undertaken at submission.
- 1.24 The initial screening triggered a range of likely significant effects relating to recreation and water quality in particular, with risks for all allocations and settlements. The implications for appropriate assessment are considered. There is strategic mitigation in place for recreation through the GIRAMS and a requirement for nutrient neutrality in place for relevant sites, alongside a need for further project level HRA and more detailed consideration for some sites. Therefore, it should be possible for an updated HRA to rule out adverse effects on integrity, alone or in-combination for the Plan with respect to all European sites.
- 1.25 At this point in time, it is anticipated that the additional allocations and settlements included in policy SS1 can be incorporated into the Plan without undermining the HRA work done to date and that the changes proposed will not materially change the overall findings of the submission HRA.
- 1.26 It is anticipated that the submission HRA will be updated alongside the final version of the Plan, including any further modifications or changes to the Plan required as the examination and further hearings progress. The HRA will be finalised at the point of adoption of the Plan. The final HRA will need to incorporate the findings from this (and a previous) addendum. In addition, the update should include reference to the latest work on the GIRAMS, the latest position on nutrient neutrality and the latest advice from Natural England.



## Appendix 1: Distance matrix: European sites and allocations

Distances (km) given are the distance from the nearest part of the boundary of the European site to the nearest edge of the allocation.

European Site: (km away)	The Brecks SAC / SPA		Breydon Water SPA / Ramsar		The Broads SAC / SPA / Ramsar		
Allocation	Breckland SAC	Breckland SPA	Breydon Water SPA	Breydon Water Ramsar	Broadland SPA	The Broads SAC	Broadland Ramsar
BLA01B	47.4	41.6	55.8	55.8	35.7	35.4	35.4
C10-1	54.6	51.6	42.6	42.6	21.1	21	21.02
C22-4 (Consolidated)	53.2	50.8	39.8	39.7	18.1	18.1	18.3
HV01C (Consolidated)	45.6	44.2	18.2	18.2	1.7	1.7	1.73
HV06A	46.1	46.2	18.1	17.9	1.7	1.7	1.74
LUD01C (Consolidated)	52.1	52.6	13.1	13.1	1.2	1.2	1.25
MUN03A (Consolidated)	56.9	55.6	32.8	32.8	11.3	11.3	11.3
NW16	51.5	50.4	29	29.1	7.4	7.4	7.6
ST04	55.4	53.1	20.3	20.5	1.5	1.5	2.2
ST19B (Consolidated)	56	53.6	19.7	19.8	1.3	1.4	2.5
BRI02C	38.60	34.0	46.9	46.9	26.1	26.1	26.1

European Site: (km away)		The Wash SPA / SAC			North Norfolk Coast SAC / SPA		
Allocation	Greater Wash SPA	The Wash SPA	The Wash Ramsar	The Wash & North Norfolk Coast SAC	North Norfolk Coast SPA	North Norfolk Coast SAC	North Norfolk Coast Ramsar
BLA01B	0.2	32.8	32.9	0.3	0.24	0.2	0.2
C10-1	0.23	51.3	51.5	11.1	11.2	11.2	11.2
C22-4 (Consolidated)	1.5	52.6	52.8	12.8	12.8	12.8	12.8
HV01C (Consolidated)	13.8	66.3	66.5	32.5	32.3	32.5	32.3
HV06A	13.6	66.7	66.9	32.9	32.7	32.9	32.7
LUD01C (Consolidated)	9.7	74.1	74.1	38.5	38.4	38.5	38.4
MUN03A (Consolidated)	0.16	61.9	62.1	22.4	22.4	22.4	22.3
NW16	5.3	60.6	62.5	22.7	22.6	22.7	22.6
ST04	4.7	70	71.5	32.8	32.7	32.8	32.7
ST19B (Consolidated)	4.5	70.9	72.4	33.7	33.7	33.7	33.6
BRI02C	11.1	37.7	37.7	11.1	11.1	11.1	11.1

European Site: (km away)	Roydon Common and Dersingham Bog SAC / Ramsar				
Allocation	Roydon Common and Dersingham Bog SAC	Roydon Common Ramsar	Dersingham Bog Ramsar	Norfolk Valley Fens SAC	Outer Thames Estuary SPA
BLA01B	36.3	38.1	36.3	8.4	56.3
C10-1	53.5	54.1	53.5	3.9	41.9
C22-4 (Consolidated)	54.1	54.3	54.1	5.5	39
HV01C (Consolidated)	60.1	60.7	63.1	13	18.8
HV06A	61.2	61.1	63.5	13.4	18.6
LUD01C (Consolidated)	68.5	68.5	70.8	20.6	12.3
MUN03A (Consolidated)	62.7	62.3	62.7	4.8	31.5
NW16	60.1	59.1	60.1	4.1	28.3
ST04	66.9	66.9	68.5	14	18.8
ST19B (Consolidated)	67.7	67.7	69.3	14.9	18.2
BRI02C	36.4	36.4	36.7	4.9	51.2

European Site: (km away)	Great Yarmouth North Denes SPA / Winterton-Horsey Dunes SAC				
Allocation	Great Yarmouth North Denes SPA	Winterton-Horsey Dunes SAC	Overstrand Cliffs SAC	Paston Great Barn SAC	River Wensum SAC
BLA01B	47.6	47.4	20.3	30.9	14.5
C10-1	30.8	30.7	1.8	13.5	25.2
C22-4 (Consolidated)	28.2	28	1.2	10.8	23.7
HV01C (Consolidated)	15.9	15.4	22.4	15.1	13.4
HV06A	15.6	15.2	22.7	15.2	13.8
LUD01C (Consolidated)	9.8	9.1	26.2	16.9	19.9
MUN03A (Consolidated)	19.3	19.3	7.2	2.2	26.4
NW16	18.3	18.1	10.1	4.1	21.1
ST04	8.7	8.4	19.3	9.6	25.6
ST19B (Consolidated)	8	7.7	20.2	10.5	24.6
BRI02C	41.4	41.2	19.6	26.8	8.8

## **Appendix 7: Inspectors Interim Findings Letter & Related Correspondence**

## North Norfolk Local Plan Examination

Russell Williams  
Assistant Director – Planning  
North Norfolk District Council  
Holt Road  
Cromer  
NR27 9EN

24 May 2024<sup>1</sup>

Dear Mr Williams

### NORTH NORFOLK LOCAL PLAN EXAMINATION

1. Following the three weeks of hearings held between January and March, I am now able to advise as to the main soundness issues raised by the plan and to seek the views of the Council as to how they might be addressed. Firstly however can I thank the Council for the arrangements which enabled the hearings to run smoothly and effectively, particularly to Mark Ashwell, the other officers and consultants who explained the plan, to Annette Feeney for all her work behind the scenes as programme officer and to Erika Temple & Charlotte Sandon for their invaluable assistance on sitting days. Can I also thank all the other participants who contributed to the discussions to enable a full and rounded debate to take place.
2. I am also grateful for the work carried out since the hearings to update and clarify various matters, particularly for the latest standard method calculation dated 26 April 2024 (document EH009(a)(i)) and the housing trajectory dated 2 May 2024 (EH013(I)) **which sets out the Council's latest position** regarding housing provision. These form key inputs to this letter.
3. Having taken full account of all the background evidence and representations submitted to date together with the hearing discussions, the main concerns relating to soundness that are relevant at this stage are set out in this letter. In addition, there are a number of other soundness issues but these could be corrected relatively simply in due course by modifications to the plan and will be the subject of a further letter.
4. This letter deals in turn with the plan period, local housing need and the housing requirement, the housing provision being made in the plan and its timing, employment provision and finally the policy for gypsy, traveller and travelling showpeople's accommodation, before bringing together the implications of these findings for the next stages of the examination.

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<sup>1</sup> Not released until 19 July 2024 due to the general election.

## Duty to Co-operate and Legal Requirements

5. I am satisfied that the Council has met the duty to co-operate and other legal requirements relating to plan preparation.

## Plan Period

6. No doubt due to its lengthy preparation process, the submitted plan covers a twenty-year period from 2016 to 2036. At present, there are only 12 years of the plan period remaining, and once the further steps necessary to ensure a sound plan have been taken, it is likely to be nearer to 11 years. The National Planning Policy Framework (NPPF) states in paragraph 22<sup>2</sup> that strategic policies should look ahead a minimum 15 years from adoption, and to be consistent with this the plan period should be extended to 31 March 2040 to allow for adoption during the next 12 months. Turning to the base date of the plan, this should correspond to the date from which the housing needs of the district are quantified. As set out in paragraph 12 below, this should be April 2024. The plan period should therefore be 2024-40. The latest housing monitoring data for permissions and projected completions reflect the position at 1 April 2023 but these are sufficiently up to date for local plan preparation purposes.

## Local Housing Need

7. The NPPF states in paragraph 61 that the minimum number of homes needed in the district should be determined by using the standard method set out in Planning Practice Guidance (PPG) unless exceptional circumstances justify an alternative approach. The standard method takes the 2014 based household projections as the demographic starting point to which an affordability uplift is applied and the figure potentially capped to limit any increase. However, the Council have used the lower 2016 based household projections for this exercise, which after the uplift and a 5% adjustment leads to a local housing need of 480 dwellings per annum (dpa) over the plan period 2016-2036, a total of 9,600 dwellings. The Council argues that there were significant errors in the 2014 based projections for the district that were corrected in the 2016 based projections. The latter are therefore more robust and should be used for the housing need calculation.
8. However, using the 2016 or more up to date 2018 based projection would be in direct conflict with national policy. PPG states that the 2014 projections should be used to provide stability, to ensure historic under-delivery and declining affordability are addressed, and to boost significantly the supply of homes. Where an alternative approach results in a lower housing need figure, as here, there need to be exceptional *local* circumstances that justify departing from the standard method. The PPG is also clear that whilst any alternative approach should be based on realistic assumptions, more recent

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<sup>2</sup> Throughout this letter, NPPF paragraph numbers relate to the September 2023 NPPF which is the relevant version for the purposes of this examination.

household projections are not appropriate for use in what would otherwise be the standard method<sup>3</sup>.

9. The **Council's** objection to the 2014 based household projections is that for North Norfolk they project forward a significantly higher rate of growth than was subsequently shown to have actually happened. The projections are derived from the mid-year population estimates which suggested an increase in population of 6,000 people between 2001-11. However, the 2011 census showed the increase was actually only 3,200 people. The 'unattributable population change' (UPC) of minus 2,800 people was almost certainly due to net in-migration being over-estimated, figures for births and deaths being broadly accurate. The 2014 based projections build in this over-estimate, taking no account of UPC, whereas the error was corrected in the 2016 based estimates resulting in a significantly lower projection for the district.
10. The existence of a UPC factor in the case of the North Norfolk projection is not disputed, the issue is whether this constitutes exceptional circumstances that justify a departure from the standard method which in any event is only intended to identify a minimum figure. All local authorities were affected by UPC to some extent, and 25 outside London were subject to a higher over-estimate of population growth than North Norfolk in percentage terms. Whilst UPC discrepancies have been taken into account in a small number of planning appeals when determining housing land supply, including in North Norfolk, no examples have been provided of this issue being put forward by Councils or accepted by Inspectors when examining development plans. National policy could have been updated to adopt the 2016 or 2018 based household projections for use in the standard method but instead PPG specifically precludes their use as set out above. The issue was the subject of a technical consultation when it was decided that later projections could not be used to justify lower housing need<sup>4</sup>. Despite **the Council's** concerns about their accuracy, however valid, the 2014 based projections are to be used to support the objective of boosting housing supply.
11. In conclusion, the UPC discrepancy does not amount to an exceptional local circumstance that justifies a departure from the standard method in North Norfolk. The discrepancy is not such an extreme outlier nor a specific local factor, and although use of the standard method leads to a significantly higher local housing need figure, this reflects national policy. Furthermore, there is no obvious reason why housing provision in the district should be unnecessarily restricted.

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<sup>3</sup> PPG paragraphs 2a-005-20190220 and 2a-015-20190220

<sup>4</sup> Technical consultation on updates to national planning policy and guidance, October 2018, and Government response to the technical consultation, February 2019.



12. Having concluded that the standard method should be followed instead of the **Council's** bespoke method, the latest available information should be used to derive the most up to date housing need figure for the district. With the latest affordability ratio published in March, it is possible to derive the local housing need figure as follows:

2014 based household projection for 2024-34	391 dpa
Latest affordability ratio 10.80 so uplift	1.425
Local Housing Need 2024-34	557 dpa <sup>5</sup>
Local Housing Need 2024-40 (16 years)	8,900 dwellings

13. The local housing need methodology takes account of any previous over or under supply, so there is no shortfall or surplus arising pre 2024 to add to this figure.

## Housing Requirement

14. The housing requirement to be delivered by the plan should be the same as the local housing need figure as there is no justification to increase the figure to accommodate an employment led approach or to meet the unmet needs of a neighbouring authority, nor to reduce the figure as a result of significant environmental or other constraints that mean the need cannot reasonably be met within the district.

## Five Year Housing Land Requirement

15. Paragraph 68 of the NPPF requires the plan to identify a supply of specific, deliverable sites for the first five years. With adoption likely by April 2025, the plan should identify a suitable supply for the period 2025-2030. With a 5% buffer<sup>6</sup>, this should be at least  $557 \times 5 + 5\% = 2,925$  dwellings, plus any shortfall from 2024/25.

## Spatial Strategy and Site Selection

16. The spatial strategy of the plan (Policy SS1) is based on a settlement hierarchy with five tiers – Large Growth Towns (Cromer, North Walsham and Fakenham), five Small Growth Towns, four Large Growth Villages, 22 Small Growth Villages and Countryside. For sustainability and accessibility reasons the plan aims to direct the majority of growth towards the larger towns with successively lower levels of growth in the case of the lower tiers with fewer services and facilities. This is a justified approach. The methodology for arriving at the hierarchy is set out in Background Paper 2 (C2) and the site selection methodology in Background Paper 6 (C6); neither were subject to serious dispute at the hearings. The apportionment of growth to the towns and large growth villages is not however prescriptive and site allocations are made on a detailed assessment of promoted sites for their availability and suitability. The results of this exercise are set out in the site assessment

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<sup>5</sup> The figure is uncapped as it is below 560 dpa

<sup>6</sup> NPPF Paragraph 74

booklets for each individual settlement (D1-D12) and the conclusions are supported by the evidence unless stated otherwise below.

## Overall Housing Provision in the Plan

17. During the plan period, housing would be provided in the following ways which are discussed in turn:
  - (i) allocations being made in the plan
  - (ii) the small growth village policy
  - (iii) large and small sites with planning permission as at April 2023
  - (iv) windfall sites that arise during the plan period
- (i) Allocations being made in the plan
18. The plan proposes a series of allocations which were selected using the process described above. With the exceptions set out below, the allocations are justified by the evidence and suitable for inclusion in the plan. In relation to the timing of development on these sites, **the Council's** latest trajectory (EH013(I)) acknowledges slippage in some cases from that expected in the submission plan. However, the trajectory still appears unduly optimistic in the case of the two large allocations at North Walsham and Fakenham and this has significant implications for housing delivery in the plan period. My conclusions in this respect are also explained below.

### North Walsham

19. North Walsham is a large growth town without significant environmental or landscape constraints and has been correctly identified as suitable for large scale development in the plan. There are however a number of highway concerns affecting key junctions and some residential roads caused by the nature of the road network, three low railway bridges and the location of the main industrial area to the north of the town. Without improvement, major development would exacerbate these issues and the strategy to concentrate growth to the west of the town in conjunction with a new western link road (WLR) is a well evidenced response.
20. The plan as submitted proposes a WLR linking Norwich Road, Cromer Road and the industrial estate in conjunction with the allocation of Site NW62/A (Land West of North Walsham) for mixed use including 2,000 dwellings<sup>7</sup>. However, the transport assessment dated November 2023 (EX017/EX018) concludes that a northern extension of the WLR over the railway line to the industrial estate is not necessary to mitigate the traffic impacts of the development. Such an extension would in any event involve major road widening/new construction and potentially a new railway bridge, with serious implications for scheme viability. In addition, the extension would encourage heavy goods vehicles (HGV) from the industrial estate to use the Norwich Road (B1150), increasing HGV flows on a sub-optimal route through the villages of Coltishall and Horstead.

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<sup>7</sup> 1,800 dwellings and elderly accommodation totalling 200 dwelling equivalents.

21. The Council therefore seek a modification to the plan to reduce the WLR to a link between Norwich Road and Cromer Road, with any northern extension a matter for the future. Whilst a shorter WLR would reduce its benefit to the town, with many HGV movements to and from the industrial estate still needing to pass through the town centre and along the residential Aylsham Road, the extension is effectively undeliverable at this time.
22. With this modification the potential access arrangements for a small part of the allocation to the north of the railway line are unclear. Intended to facilitate the WLR extension to the industrial estate, without the extension this area would comprise an isolated area of housing development, poorly related to the town and an unjustified intrusion into the countryside. This part of the allocation should therefore be deleted from the plan. This would not significantly affect the 2,000 dwelling capacity of the allocation.
23. The 2.4 ha employment allocation Land East of Bradfield Road (NW52) is also intended to facilitate a link from the industrial estate to the WLR and without it would undesirably increase HGV movements through the town. The site is not essential for employment purposes in the plan period as explained in paragraphs 50-53 below and would encroach into the countryside to the north-west of the town. The site should therefore be deleted from the plan pending consideration of any northern extension of the WLR in the future.
24. The timing of the development west of the town is not clear at this stage. Although much preparatory work has been done, the overall scheme is complex, with two roundabouts needed to gain access to the initial phases, off-site highway improvements, some before construction can commence in earnest, and much legal and technical work required. **The consortium's** evidence on timing has been inconsistent, indicating the situation is still fluid, and only a 'high level' Gantt chart with little detail has been produced. It is intended to submit an outline planning application in Summer 2024 with approval anticipated by the end of 2025, after which reserved matters, technical approvals and early site works will be required before house construction can commence. The viability assessment allows two years for these processes, to the end of 2027, and then 9 months until the first house completions in 2028/29. The plan as submitted assumed completions would commence in 2026/27 whilst the latest schedule indicates slippage of a year to 2027/28. However, the current level of uncertainty and clear scope for delay suggests 2028/29 for the first completions is more likely, slippage of two years from the submitted plan. Indeed, this is still optimistic in the light of the findings of the Lichfields Start to Finish research.
25. In terms of anticipated completion rates, the development will overlap with the build out of Site NW01/B (Land at Norwich Road & Nursery Drive), a more straightforward site with hybrid planning permission due to be issued shortly. House completions and a care home on this site from 2026/27 to 2033/34 are likely to compete with those coming forward on NW62/A. The completion rate provided at the hearing of an average of 100 dpa based on two outlets, with periodic tranches of elderly accommodation, as originally put forward in the submitted plan, is thus more realistic than the overly

optimistic and widely fluctuating profile of completions in the latest schedule. The plan should therefore assume the trajectory in the submitted plan but delayed by two years. The upshot of this is the provision of about 1,270 dwellings on the site during the plan period instead of the 1,596 shown on the **Council's** latest schedule, a reduction of 326.

## Fakenham

26. Significant development was proposed for Fakenham, another large growth town, when 85 ha of primarily agricultural land north of Rudham Stile Lane **was allocated in the Council's Site Allocations DPD adopted in 2011. Progress** in delivering the main site however has been slow, with a development brief approved in 2015 and outline planning permission for up to 950 dwellings on the area east of Water Moor Lane only granted in 2021 following a four-year determination period. Several reserved matters still remain to be resolved, the means to address the nutrient neutrality issue that emerged in 2022 are not yet fully identified, and no developer is currently in place. As a result, the latest trajectory assumes the scheme will start to deliver completions in 2027/28, three years later than the 2024/25 date in the plan as submitted. Completions are projected to rise to an average of 100 pa from two outlets. Whilst many steps still need to be taken, this should be achievable.
27. Whilst the site east of Water Moor Lane is thus a commitment, that to the west has no planning permission in place and consequently is reallocated in the local plan as Site F01/B (Land North of Rudham Stile Lane) for about 627 dwellings<sup>8</sup>. The site is in effect a continuation of that to the east and for the most part is in the hands of the same institutional landowner. The strategy for development of the allocation forms part of that drawn up for the wider site and there is little doubt that the necessary applications will be made in due course to enable the full site to be built out. However, the delays so far will have a knock-on effect on the timing of completions.
28. Whilst there may be some overlap between the development of the land east and west of Water Moor Lane the sites would be in direct competition. The plan as submitted assumed that building on the land to the west would pick up as that to the east winds down, the most likely scenario. However, the **Council's latest trajectory** for delivery of the site is the same as that in the submitted plan, with no allowance for slippage. There is no evidence for this, and delivery in parallel of up to 200 or so dwellings a year is unlikely. A more realistic assumption is that building on the land to the west would be delayed by three years from the date assumed in the submitted plan, like that to the east. Completions from both sites together would then peak at a maximum of 150 in a single year. This would mean Site F01/B starting delivery in 2035/36 with the profile then as in the submitted plan. The upshot of this is the provision of about 327 dwellings on the site during the plan period (plus 950 on the site to the east) instead of the 627 shown on **the Council's** schedule, a reduction of 300.

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<sup>8</sup> 560 dwellings and elderly accommodation totalling 67 dwelling equivalents.

## Cromer

29. The plan as submitted allocates three sites in Cromer, the third large growth town. Two lie in the Norfolk Coast National Landscape (formerly Area of Outstanding Natural Beauty), the Former Golf Practice Ground, Overstrand Road (C16) for 150 dwellings and Land West of Pine Tree Farm (C22/2) for 400 dwellings plus an element of elderly accommodation in each case. Whilst major developments in relation to Cromer the requirement for growth to meet local housing need **and the town's** position in the settlement hierarchy constitute exceptional circumstances to justify the developments in the public interest. However, a further site outside the National Landscape, Land at Runton Road/Clifton Park was proposed as an allocation for 90 dwellings in the 2019 draft plan but was not carried forward into the submitted plan. The merits of this site should clearly be reconsidered as one of the options under paragraph 48(i) below. Site CO7/2 (Land at Cromer High Station) has been allocated since 2011 without development coming forward and in the circumstances none should be assumed in this plan period.

## Wells

30. Wells lies within the Norfolk Coast National Landscape, but as a small growth town with particularly high house prices and second/holiday home ownership, there are exceptional circumstances that justify further housing development in the public interest where suitable sites are available. The submitted plan allocates two sites, with Site W01/1 (Land South of Ashburton Close) forming a natural extension to the Home Piece Road estate, a recent scheme which demonstrates how the town can acceptably expand away from the front.
31. However, the second allocation, Site W07/1 (Land adjacent Holkham Road) lies on the coastal side of the ridge which extends to the west of the town. The site comprises the top section of a grassed field which rises from the B1105 Holkham Road at about sea level up to the 20 m contour and the rear gardens of the houses fronting Mill Road on the ridge. The site enjoys wide views to the north over the Wells salt marshes, harbour, Holkham Meals and reclaimed farmland as far as **Lady Ann's Drive**, but the corollary of this exposed position is the impact that housing development on the site would have on this sensitive and nationally defined heritage coast landscape.
32. The site is well screened from Holkham Road by the roadside hedgerow but is clearly seen in intermittent long-distance views from the North Norfolk Coast **Path from the café at the end of Lady Ann's Drive to Wells beach car park**, and most seriously in ever closer views when approaching the town along the top of the Beach Road embankment, a heavily used route which also forms part of the long distance path. The scheme would also be intrusive when seen from the Wells Town football ground and overflow car park area. Whilst the houses along Mill Road would lie behind the development on the skyline, the trees within and at the back of their long rear gardens do much to mitigate their impact. By contrast, a new development of 50 dwellings along

the top of the field, however well designed and landscaped on its northern edge, would appear raw and intrusive in the landscape for many years.

33. The site itself lies just within the Rolling Open Farmland landscape character type (LCT)<sup>9</sup> but is heavily influenced by its position overlooking the Drained Coastal Marshes and Open Coastal Marshes LCTs. Contrary to the landscape guidance for these LCTs the proposed allocation would consolidate a form of linear sprawl along the undeveloped coast, intrude into views inland from the coastal marshes, detracting from their naturalistic nature and reducing their relative tranquillity and remoteness, including at night when additional light sources on the ridge would erode the dark night sky.
34. The proposed access to the site from Mill Road, cutting across an attractive grass paddock in front of the Mill Farm buildings and adjacent to Nos 106-110, would also be an unduly intrusive feature. It would be poorly related to the housing estate behind, an odd entrance to the scheme, both spoiling the existing paddock and urbanising the A149 western approach to the town.
35. For these reasons the evidence base supporting the allocation is flawed. In particular, the landscape impact assessment under the site selection methodology should be red – the landscape impact on a sensitive landscape cannot be mitigated – rather than amber – mitigation would be possible. There is no clear physical boundary on the ground to distinguish this site from the larger site W07 of which it forms part, and which has rightly been assessed as unsuitable for development. The allocation of Site W07/1 is not justified and thus it should be deleted from the plan.

#### Sheringham

36. Full planning permission has been granted and construction is well underway on Site SH07 (Former allotments, Weybourne Road, adjacent to The Reef). The allocation should now be deleted from the plan.

#### Hoveton

37. In the case of Site HV01/B (Land East of Tunstead Road), the Council are proposing that the allocation as submitted should be extended to the north with the site capacity increased from 120 to 150 dwellings plus elderly accommodation. Although there was some discussion about the larger site at the hearings, the extension proposal has not been subject to full public consultation, and this should be carried out as part of the process outlined in paragraph 58 below.

#### Ludham

38. Site LUD06/A (Land at Eastern End of Grange Road) has been allocated since 2011 with no development coming forward. The access is constrained by the presence of preserved trees with no evidence this can be overcome. The allocation should therefore be deleted from the plan.

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<sup>9</sup> As defined by the North Norfolk Landscape Character Assessment SPD January 2021

(ii) The Small Growth Villages Policy

39. The strategy in Policy SS1 and set out in Appendix 4 relating to Small Growth Villages is not justified or effective as submitted. Whilst it is potentially a sound approach to specify an acceptable percentage growth figure for such settlements rather than to allocate sites in the plan, the approach is inherently uncertain and brings significant disadvantages both for the communities concerned and other interested parties. However, there are precedents for such an approach (eg Breckland Local Plan Policy HOU04) and should the Council wish to pursue it, some modifications would be required.

40. In particular, these are:

- the stipulation that no further permissions will be granted after the village 'allowance' is reached is arbitrary and not justified. The policy should be reworded to allow 'not significantly more than' a 6% increase in dwellings.
- there is no justification for an arbitrary quantitative limit on new dwelling provision within the defined settlement boundaries at any time.
- criterion (e) should be deleted as there is no justification for small sites to incorporate substantial community benefits. Any requirements to make the development acceptable can be secured under Policy HC4.
- criterion (f) is not justified as currently worded and would render the policy ineffective by causing uncertainty and acting to deter schemes coming forward<sup>10</sup>. The criterion could however be reworded to state that suitable schemes proposed in partnership with a registered social landlord that would deliver affordable housing in excess of the normal Policy HOU2 requirement will receive particularly favourable consideration.
- **Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance (31 in the revised list in document A5.11) set at 0 as there is no realistic prospect of the local water recycling centre meeting the required environmental standards in the foreseeable future. This is due to unstable ground conditions and a permanently high water table leading to groundwater infiltration of the sewerage network for which no solutions have yet been identified.**

41. The total provision from this source over the plan period should therefore be reduced from 453 to 422 dwellings starting in 2027/28 as the policy only commences on adoption of the plan. However, there is considerable scope for widening the policy as explained in paragraph 48 below.

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<sup>10</sup> Breckland Local Plan Policy HOU04 does not contain such a criterion.

(iii) Large and Small Sites with Planning Permission as at April 2023

42. **The Council's** monitoring of sites with planning permission as at April 2023 indicates 1,646 dwellings are likely to come forward during the plan period 2024-40 on large sites of over 10 dwellings (950 of these on the site north of Rudham Stile Lane at Fakenham) and 441 on small sites. These figures allow for a non-implementation rate.

(iv) Windfall sites that arise during the plan period

43. The submitted plan was based on April 2021 monitoring data and assumed that previously unidentified windfall sites would start to contribute housing completions just one year later, in 2022/23. However, the latest trajectory, with planning permissions recorded as at April 2023, assumes a two-year gap with windfall sites making a contribution from 2025/26. This is a reasonable assumption. The likely contribution from this source can only ever be an estimate, with the submitted plan assuming 135 dpa, a cautious figure well below the historic average of 295 dpa which came forward from windfall sites during the period 2016-23. It should be noted that under Policy SS1 windfall sites in 22 small growth villages will now count towards a separate total.

44. In the letter dated 25 March 2024 (EH013(k)) the Council propose that the windfall allowance for the period 2029/30 to 2039/40 should be increased to 180 dpa, an additional contribution of 495 dwellings over the plan period. This is considered in paragraph 47 below.

## Overall Housing Provision in relation to the Requirement

45. With the adjustments set out above, the overall conclusion is that the plan would provide about 8,212 dwellings over the plan period 2024-40 towards the overall requirement of 8,900, a shortfall of about 700 dwellings. In relation to housing land supply for the five-year period 2025-30, the plan would provide about 2,893 dwellings compared to a requirement of 2,925 dwellings. When the shortfall from 2024/25 is added, this would amount to a significant undersupply and there would be no allowance for any unforeseen contingencies.

## Housing Provision – Way Forward

46. Unfortunately, for the reasons set out above, the plan does not at present provide sufficient housing to meet the housing needs of the district over the full plan period, with a projected shortfall in both the early and later years. There is an initial five-year housing land supply shortfall. Furthermore, should the planned allocations or other sites not come forward as currently anticipated, which is quite possible, the shortfall in the early years would increase. A standard plan review after five years would not address this early-years issue, although it could bring forward further land later in the plan period if necessary. I am not therefore able to conclude at present that the plan is positively prepared, meeting the objectively assessed needs of the district, one of the tests of soundness in paragraph 35 of the NPPF.



47. The shortfall is about 700 dwellings, but this allows no contingency for unforeseen events such as further slippage of the large allocations, the non-implementation of smaller allocations, the small growth villages policy not working as intended or insufficient windfall sites coming forward. The need for schemes to deliver nutrient neutrality in much of the district, with solutions still uncertain at the time of writing, is a factor here. Therefore, as matters currently stand, the provision made by the submitted plan should be increased by at least 1,000 dwellings to allow some flexibility. I do however agree that in North Norfolk with its numerous settlements and extensive countryside there is enough scope for windfall sites to come forward that the **Council's revised estimate of** an additional 495 dwellings from this source over the plan period can go some way to filling the gap.
48. However, excessive reliance on unspecified windfall sites adds uncertainty to the plan and more concrete steps need to be taken to bring forward more housing in the plan period, particularly in the early years. The options available include, and there may be others:
- (i) Additional or extended allocations in large and small growth towns and large growth villages in accordance with the spatial strategy and settlement hierarchy of the plan. Whilst further sites in Fakenham and North Walsham should not be ruled out, they may divert some demand from the large-scale developments already proposed for these towns.
  - (ii) Increasing the expansion of small growth villages above 6%.
  - (iii) Expansion of the list of small growth villages to include those with a single key service or (say) three secondary/desirable services. As document EX034(a) demonstrates, there are numerous villages with a primary school, convenience shop or other services that are sufficiently nucleated in form to allow for a coherent settlement boundary which are not currently included.
  - (iv) Inclusion of a new policy allowing sensitive infilling and rounding off in small villages and hamlets without a settlement boundary (Breckland Local Plan Policy HOU05 is an example in an area with a similarly dispersed settlement pattern). Alternatively, settlement boundaries could be defined but without any provision for development beyond the boundary.
  - (v) If the allocation in the Wells Neighbourhood Plan at Two Furlongs Hill is included in the finalised plan the proposed 45 dwellings could be included in the future supply.
49. Policy support for (ii) – (iv) above is provided by paragraph 79 of the NPPF which advises that housing should be located to enhance or maintain the vitality of rural communities, opportunities should be identified for villages to grow and thrive, especially where this will support local services, and where there are groups of smaller settlements, development in one village may **support services in a village nearby**. As submitted the plan's policies for smaller villages, even some with key services, are unusually restrictive.

## Employment Land

50. Whilst much of the employment in the district lies in other sectors, with jobs in food/accommodation, agriculture and retail above the regional average, it is important to provide and protect an adequate supply of employment land for industrial and other businesses to develop and thrive. To secure this, Policy E1 in the submitted plan seeks to allocate 200 ha of existing, 54 ha of undeveloped and 16 ha of new employment land in the various settlements across the district, 271 ha in all<sup>11</sup>. There is much redevelopment of existing employment land as the needs of individual businesses change, but the scope for 70 ha of new development is more than sufficient to accommodate the most optimistic projection for a take up of 40 ha during the submitted plan period 2016-36. Other projections indicate that the realistic requirement is in fact much less, perhaps as low as 6.5 ha.
51. Unfortunately, the owner of the proposed 6 ha employment allocation at Heath Farm, Holt (Site H27/1) does not now wish to pursue development, and as explained in paragraph 23, the 2.4 ha allocation east of Bradfield Road, North Walsham (Site NW52) should also be deleted from the plan. However, even with 8.4 ha less provision for new development and a plan period extended by four years to 2040, there would still be sufficient land being made available to meet the likely need.
52. This is particularly the case as it is proposed to amend Policy E3 to allow scope for employment development outside designated areas if no suitable land is available within them. In addition, Policy E3 could include support for alternative proposals to come forward in Holt if suitable sites become available, as the withdrawal of the allocation results in a lack of employment land options in the town.
53. Overall therefore, there are no significant soundness issues in relation to the provision of employment land in the plan.

## Gypsy, traveller and **travelling showpeople's** accommodation

54. Policy HOU5 seeks to meet the accommodation needs of gypsies, travellers and travelling showpeople in the district with a criteria-based policy on the basis that the latest needs assessment demonstrates that the requirement for further sites is likely to be very small. However, that assessment<sup>12</sup> is based on seven-year old fieldwork with its most accurate projections of need relating to the five-year period 2017-22.
55. With the passage of time the evidence base of the plan is not now sufficiently robust to assess future need in order to set pitch/plot targets in accordance with paragraph 9 of the Planning Policy for Traveller Sites<sup>13</sup>, nor, if necessary, to identify a supply of sites in accordance with paragraphs 10-11. The

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<sup>11</sup> Corrected figures, the new allocation at Stalham is 1 ha

<sup>12</sup> Norfolk Caravans and Houseboats Accommodation Needs Assessment including for Gypsies, Travellers and Travelling Show People, RRR Consultancy Ltd, October 2017

<sup>13</sup> December 2023 version

existing assessment also pre-dates the change in the definition of gypsies, travellers and travelling showpeople made in December 2023.

56. In order to ensure the plan is sound, the Council should therefore commission an updated study to assess need in accordance with latest best practice and then to consider what steps might need to be taken to address its findings in the plan, including if necessary proposing allocations or amending the criteria in Policy HOU5.

## Conclusion

57. Whilst the Council may be disappointed that it is not possible to move directly to the main modifications stage, there is a clear way forward for the plan if the shortfall in housing provision is addressed together with any implications of an up to date accommodation assessment for gypsies, travellers and travelling showpeople.
58. The Council will no doubt wish to take some time to consider how to address the housing provision issue. Please keep me informed of progress. In due course I should be advised of the suggested changes to the submitted plan to ensure they have the potential to overcome the soundness issue, after which the Council should carry out a six-week public consultation exercise on those changes. Assuming the Council wish to proceed in the light of the response, any representations made would be treated as representations on the local plan and would be considered as part of any future resumed hearings that may be necessary.
59. In due course I would be grateful for a formal response to this letter setting out how the Council wish to proceed and the anticipated timetable for the work that is necessary.
60. This letter should be placed on the examination website for information. I will ask the programme officer to inform hearing participants when it is published but I am not inviting or accepting submissions from other parties at this stage.

*David Reed*

INSPECTOR



16 August 2024

Mr David Reed  
Planning Inspector  
c/o Mrs Annette Feeney  
North Norfolk Local Plan Examination Programme Officer  
Sent via email

Dear Mr Reed,

#### **NORTH NORFOLK LOCAL PLAN EXAMINATION**

Thank you for your post-hearings letter of 24 May 2024 (received 22 July 2024), which sets out your initial findings of the main soundness issues and a number of options to address these.

The Council appreciates and is pleased with the positive view that there is a clear way forward for the Plan if the shortfall in housing provision is addressed together with any implications of an up-to-date accommodation assessment for gypsies, travellers and travelling showpeople.

In your letter you requested a formal response, setting out how the Council wishes to proceed and the anticipated timetable for undertaking the necessary work. Accordingly, the Council can advise the below broad actions to address the main soundness issues raised.

An action plan and anticipated timetable are included at the end of this letter.

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### **Plan Period**

**The Council agrees to adjusting the plan period from 2016-36 to 2024-40.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

It is understood that the latest housing monitoring data for permissions and projected completions which reflect the position at 1 April 2023 are considered to be sufficiently up to date as the base housing monitoring date for local plan preparation purposes, and as such will not be revisited.

## Local Housing Need

**The Council is disappointed with the stance taken and justification given on the calculation of local housing need, however, accepts the direction that, for the purposes of preparing this Local Plan, the standard method for calculating local housing need with 2014-based household projections is to be followed instead of the Council's proposed alternative method.**

**Action:** This change will result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

The Inspector concluded that the Unattributable Population Change (UPC) discrepancy does not amount to exceptional local circumstances that justify a departure from the standard method and 2014 based projections.

The implications of this, is a housing need of 8,900 dwellings over the new Plan period 2024-40 and an annual requirement of 557 dwellings per annum - an increase of 77 dpa.

It should be noted that the Council maintains the 2014 based projections do not provide an accurate assessment of future household growth in this local area as they project significantly higher population growth from inward migration than what has been proven to have occurred, referred to as 'Unattributable Population Change' (UPC). It is also considered that the lack of other examples strengthens rather than weakens its argument that these are exceptional local circumstances that justify the use of an alternative methodology.

The Council's alternative approach uses more recent official projections to provide robust assessment that "*reflects current and future demographic trends*" as required by the Framework. It then uses the same approach as the standard method to reflect "*market signals*". The use of the Council's alternative method was intended to provide an accurate assessment of need to enable it to properly plan for and support the objective of boosting housing supply.

Notwithstanding the Council's opinion on this matter, it is nevertheless, keen to address the concerns raised and to undertake the adjustments considered necessary as set out, to calculate and plan for the most up-to date housing need figure for the district. The Council does not want to unnecessarily delay the Plan and in taking a pragmatic stance considers that this is achievable as set out below in a reasonable time period.

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## Five Year Housing Land Supply

**The Council agrees that the plan should identify a suitable supply for the period 2025-2030 as set out in Paragraph 15 of the May 24 Letter. The Plan should identify a suitable supply for the 2025-2030 period incorporating a 5% buffer. This should be at least  $557 \times 5 + 5\% = 2,925$  dwelling plus any shortfall from 2024-25.**

**Action:** This change will result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

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## Allocations being made in the Plan

### CROMER

*Land at Cromer High Station, Norwich Road (C07/2)*

**The Council agrees that no dwelling completions should be assumed for this site during the plan period 2024-40.**

**Action:** The latest trajectory (EH013 (I)) has already been updated to reflect that zero dwellings are project within the Plan period. This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

*Land at Clifton Park (C10/1)*

**The Council agrees to reconsider the merits of Land at Runton Road/Clifton Park as one of the options under paragraph 48 (i) in the letter.**

**Action:** Subject to member endorsement, this change will result in a proposed Main Modification to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

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### FAKENHAM

*Land North of Rudham Stile Lane (F01/B)*

**The Council accepts that the delivery schedule for F01/B should show delivery starting in 2035/6 with the delivery profile then the same as the submitted Plan (January 2022).**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

Examination Library document EH013(I) projects first dwelling completions on the site in 2032/33. It is understood that the implications of moving the delivery schedule back by three years to 2035/36 results in 327 dwellings being delivered within the Plan period - a reduction of 300 dwellings.

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### NORTH WALSHAM

*Land West of North Walsham (NW62/A)*

**The Council accepts that the delivery schedule for NW62/A should show delivery starting in 2028/29 with the delivery profile then the same as the submitted Plan (January 2022).**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The submitted Local Plan trajectory timeline for North Walsham West (page 267) has been used as it is concluded to be a more realistic projection of likely delivery than the position set out in examination document EH013(I).

It is understood that the implications of moving the delivery schedule back by two years to 2028/29 results in 1,270 dwellings being delivered within the Plan period - a reduction of 326 dwellings.

**The Council agrees that delivery of an extension of the proposed Western Link Road over the railway line is shown to be undeliverable at this time and is not necessary to mitigate the wider traffic impacts of the development.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

**The Council agrees to remove a small part of the allocation north of the railway and that this does not materially affect the overall dwelling capacity of NW62/A.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

#### *Land East of Bradfield Road (NW52)*

**The Council accepts that the 2.4-hectare employment allocation should be deleted from the Plan pending consideration of any northern extension of the Western Link Road in the future.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

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## **WELLS-NEXT-THE-SEA**

### *Land Adjacent Holkham Road*

**The Council is disappointed with the conclusion to delete the site based on landscape impacts.**

**Action:** This change would result in a proposed Main Modification to the Plan which would potentially be subject to future public consultation. However, the Council supports the retention of the site as an allocation. It should be noted that a planning application has since the initial hearing sessions been submitted to the Council and as such the site may in any case benefit from a granted planning permission in due course.

The Council notes the issues raised but has concerns around the justification offered for deletion of the site. The application planning statement states that *“the proposed scheme has evolved in response to feedback received during detailed pre-application consultation with North Norfolk District Council, Wells-next-the-Sea Town Council and local residents. The result is a scheme that is tailored to meet local needs, respect the character of the area and the amenity of local residents”*. The application is also supported by a further independent landscape visibility impact assessment which along with evidence put forward by the Local Plan team, the

Wells Np steering group and the promoters through The Landscape Partnership conclude that the site can be mitigated. The site sits outside the Heritage Coast and it is considered that the site would appear as a natural extension to the settlement which could be carefully designed to minimise any adverse effect on the wider landscape through the use of (but not limited to) bungalows to reduce sale, buffer zone on the ridge and increased planting and as such represent an appropriate addition to the town which is broadly in keeping with the character of the area.

In addition, there are considerable material considerations as detailed through the Hearing sessions in the form of a bespoke housing approach designed to address the very specific local circumstances of Wells-Next-The-Sea. The approach agreed with the promoters, Wells Town Council and the Council and could be included in any site allocation policy achieves a mix of dwellings on the site that would help meet the unique and critical needs of the local community. The approach consists of 45% affordable dwellings and a further 10% for private rent to local people which is seen as beneficial in order to help replenish a diminishing resource due to the demand for holiday lets in the area. The remaining (21) dwellings would be for private sale. The site is also capable of being delivered in the first five years of the Plan period.

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## SHERINGHAM

*Former Allotments, Weybourne Road, Adjacent The Reef*

**The Council agrees to remove the allocation, which has full planning permission and is currently nearing completion.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

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## HOVETON

**The Council agrees to consult on the proposed extension of the site, as proposed during the earlier hearings.**

**Action:** This change will result in a proposed Main Modification to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

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## LUDHAM

**The Council agrees to remove the allocation due to access constraints.**

**Action:** This change will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

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## The Small Growth Villages Policy

**The Council agrees to the actions set out in the first three bullet points as set out in paragraph 40.**

**Action:** This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

**The Council agrees (in relation to para 40 bullet, point 4 of your letter) that modification is required to criterion 3(f) of Policy SS1.**

**Action:** Could it be clarified if one of the below proposed replacement criteria is suitable? This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

The Council has already proposed modifications (including PMIN/SS1/02 and through the earlier Hearings) to criterion 3(f) of Policy SS1 as follows:

*f. In the case of sites in excess of 0.5 hectares, the site, together with any adjacent developable land<sup>(2)</sup>, has first been offered to local Registered Providers<sup>(3)</sup> on agreed terms<sup>(4)</sup>, which would allow its development for affordable homes, and such an offer has been declined.*

2. 'adjacent developable land' relates to land all in the same ownership.

3. 'local Registered Providers' that are active in the area.

4. 'agreed terms' relates to the terms agreed with the Local Authority.

Alternative wording could be considered, more in line with the suggested wording set out in the May 24th letter which also reflects the reality and priorities around the delivery of exceptions sites in North Norfolk, as set out below:

*f. suitable schemes proposed in partnership with a Registered Provider that deliver a minimum of 50% affordable housing would receive favourable consideration.*

The reasons for this, is that the purpose of criterion 3(f) of Policy SS1 stems from the need to align the Small Growth Villages approach with Policy HOU3: Affordable Homes in the Countryside (Rural Exceptions Housing). From the experience of the Council's Housing Strategy team, the Small Growth Villages are (aside from the towns) the most 'desirable' places for Registered Providers to develop affordable housing (rural exceptions schemes) as they provide homes in the more sustainable locations with access to facilities. Consequently, without some form of appropriate wording at criterion 3(f) there is significant concern that, in reality, the remaining criteria would curtail future opportunities for such exception schemes in many of the Small Growth Village locations, not least because of residual hope value.

**The Council agrees that Horning should be treated as a 'Constrained Small Growth Village' and the indicative housing allowance removed.**

**Action:** This will result in a proposed main modification to the Plan which will be subject to future public consultation.

## Windfall sites that arise during the plan period

**The Council agrees that the likely contribution from this source of housing supply from 2029/30 to 2039/40 can increase to 180dpa and remains an acceptably cautious figure.**

**Action:** This will result in a proposed Main Modification to the Plan which will be subject to future public consultation.

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## Housing Provision - Way Forward

**The Council agrees to a number of proposed options as set out in paragraph 48, and will review the potential for:**

- a) Additional or extended allocations
- b) Increasing the expansion of small growth villages above 6% (to 8%)
- c) Expansion of the list of small growth villages to include those with a single key service and (say) three secondary/desirable services and in line with the further stages of review as set out in the Council's methodology for site selection background paper [C2]
- d) Inclusion of the allocated 45 dwellings at Two Furlong Hill in the adopted Wells-next-the-Sea Neighbourhood Plan in the future supply.

**Action:** These changes would result in a number of proposed Main Modifications to the Plan, which will need to be informed through further public consultation as part of the action plan detailed below.

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## Employment Land

**The Council agrees to the removal of H27/1 Land at Heath Farm, Holt, (site withdrawn by owner) and NW52, Land at Bradfield Road, North Walsham from the Plan.**

**Action:** These will result in proposed Main Modifications to the Plan which will be subject to future public consultation.

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## Gypsy, traveller and travelling showpeople's accommodation

**The Council agrees that an updated Gypsy & Traveller Accommodation Needs Assessment is required.**

**Action:** A revised Gypsy and Traveller Accommodation Need Assessment has already been commissioned and is expected to be available late August / early September. This evidence, and any resulting changes to the Plan, will be made publicly available through further public consultation as part of the action plan detailed below.

## Action Plan

The following details the substantive areas where additional work and/or evidence is required in order to address the main soundness issues. These changes will be subject to member endorsement, public consultation to enable feedback, to inform any required future hearing session(s) and the content of further Main Modifications so that the Local Plan addresses the concerns raised.

### 1. Gypsy, traveller and travelling showpeople's accommodation

A revised Gypsy and Traveller Accommodation Need Assessment has been commissioned based on best practice is expected to be available late August/ early September. Any necessary changes to the Plan that arise from the assessment will be drawn up.

### 2. The Small Growth Villages Policy

Pending officer review and member endorsement:

- a) Increase the growth allowance to 8%,
- b) Review the policy options and potential to Increase the number of SGVs to include those with a single key service and, say 3 secondary/desirable services, taking into account environmental and infrastructure constraints.

### 3. Local Housing Need & Overall Housing Provision in the Plan

In order to address the minimum 1,000 dwelling shortfall identified, the Council proposes a range of measures that could increase the supply and flexibility of housing delivery across the Plan period by approximately 1,300 -1,500 additional dwellings. This will be achieved by a combination of:

- a. **Additional Sites** - undertaking a high-level review of additional sites considered suitable for development but not previously selected, (approximately 430)
- b. **Extended Sites** - identification of existing proposed allocations with suitable scope to be extended. (approximately 220 dwellings)
- c. **Increased Capacity of Sites** - identification of existing proposed allocations with suitable scope for their dwelling yield to be increased. (approximately 100)
- d. **Small Growth Villages Policy**
  - i. Increasing the overall capacity of Small Growth Villages from 6% to 8%.
  - ii. A review of the potential to expand the number of Small Growth Villages and potential policy options [if endorsed, this approach would result in further additional housing supply over and above the 1,300 dwellings].
- e. **Windfall** - based on a proven historical delivery trend of delivering 295 dwellings per annum as 'windfall', the Council proposes to include in the housing supply from 2029/30 an annual windfall allowance of 180dpa. This will account for an addition 495 dwellings across the plan period.
- f. **Wells-next-the-Sea Neighbourhood Plan** - incorporating the 45 proposed dwellings from the adopted Neighbourhood Plan in the housing supply of the Local Plan.

## Timeline

Subject to member endorsement, it is anticipated that this work, including a six-week public consultation period, as set out below, could be achieved within five months meaning that any further hearing session(s) could be held early in the new year.

This would keep the Plan on track to meet anticipated adoption in April 2025, as anticipated in Paragraph 15. An indicative breakdown based on the work detailed above is set out below, where any further work could impact this:

Task		Date Expected
1.	Initial scoping and background work	August 2024
2.	Completion of Background Papers and detailed assessments	September 2024
3.	Member endorsement (Planning Policy & Built Heritage Working Party)	October 2024
4.	Member endorsement (Cabinet)	November 2024
5.	Six-week Public Consultation	Mid November - December 2024 (TBC)
6.	Further Public Hearing(s)	February 2025 (TBC)
7.	Consolidation and finalisation of proposed modifications and supporting documentation and required consultation	TBC
8.	Receipt of Inspector's Report	TBC

We trust that the above provides a pragmatic approach and brings clarity on the Council's intentions. We would be very grateful for your response in due course to clarify if the actions proposed at this time will, in your opinion, address the main soundness issues, subject to the outcomes of further public consultation, future public hearings and the ongoing examination process.

We would be grateful for your clarification on the question raised in relation to Policy SS1 3 (f)

We will of course provide the detailed policy proposals to be contained in the six-week public consultation following member endorsement.

In April the Council submitted draft schedules covering the strategic policies and sites which consolidated the main and additional modifications put forward through the earlier Hearings. Whilst recognising that some of these areas will now need to be informed by further consultation it is understood that the remaining issues can be corrected in due course through modifications to the plan once the specific wording has been agreed. Officers would welcome

timely feedback on these proposed so as to progress the work in a manageable way alongside the actions above.

Yours sincerely

**Iain Withington**

Acting Planning Policy Manager

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## North Norfolk Local Plan Examination

Russell Williams  
Assistant Director – Planning  
North Norfolk District Council  
Holt Road  
Cromer  
NR27 9EN

30 August 2024

Dear Mr Williams

### NORTH NORFOLK LOCAL PLAN EXAMINATION

Thank you for your letter dated 16 August 2024 in response to my post hearings letter dated 24 May 2024<sup>1</sup> and for the Council's mostly positive approach to seek to address the main soundness issues raised. I have the following response.

1. The intention to base the plan's examination on the housing monitoring information from April 2023 is in order to provide stability but may need to be reviewed if the timescale for the future steps set out in your letter slips significantly.
2. The receipt of a planning application for Site W07/1 at Wells is noted but this does not change the merits of the allocation set out in my previous letter and in the light of unallocated sites on the southern side of the town with little or no impact on the most sensitive coastal landscape character areas. Given the conclusion of the examination that the allocation be deleted any decision to approve the application should be considered a departure from the emerging local plan in conflict with its evidence base.
3. The plan places significant reliance on housing delivery from an untried and unproven (in this district) small growth villages policy, as opposed to the previous approach of allocating sites in such villages. It follows that the wording of Policy SS1(3) and criterion f must not render the policy ineffective by causing uncertainty and/or acting to deter schemes from coming forward. The matter can be discussed at any further public hearings, but the latest wording you suggest for criterion f seems encouraging of schemes and may therefore be acceptable.
4. I must emphasise that, in addition to publishing an updated Gypsy, Traveller and Travelling Showpeople accommodation needs assessment, the Council should consider what steps need to be taken to address the findings in the plan, including if necessary proposing allocations or amending the criteria in

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<sup>1</sup> Not released until 19 July 2024 due to the general election.

Policy HOU5. Any proposed changes to the plan should form part of the forthcoming six-week public consultation.

5. Turning to the Council's proposals to increase the supply and flexibility of housing delivery by approximately 1,300 to 1,500 additional dwellings over the plan period, depending on how it is done this should be a good basis for the examination to proceed. This is without prejudice to the future findings of the examination which will depend on the evidence presented, consultation responses and any further public hearings.
6. However, the Council will know better than anyone the latest position in relation to housing completions, unidentified sites coming forward, nutrient neutrality constraints and the latest progress in relation to large schemes, particularly those at Fakenham and North Walsham. These matters are likely to be raised at any future public hearings and will have a bearing on the number of additional dwellings needed to ensure an adequate housing land supply going forward.
7. The timeline the Council proposes for the various steps to progress the plan are acceptable but should not be allowed to slip significantly. Please keep me advised as to progress. The Council will be aware of the letter from the Minister of State dated 30 July 2024 regarding 'pragmatism' in local plan examinations and the reply from the Chief Executive of the Planning Inspectorate dated 1 August 2024. In this case the plan is capable of being found sound with limited additional work to address soundness issues, but that additional work should be progressed at pace.
8. This letter should be placed on the examination website for information. I will ask the programme officer to inform hearing participants when it is published but I am not inviting or accepting submissions from other parties at this stage.

*David Reed*

INSPECTOR