



Intelligent Plans
and examinations

**FACILITATION REPORT TO HOLT TOWN COUNCIL
IN RESPECT OF
THE HOLT NEIGHBOURHOOD PLAN 2018-2036**

Report by Intelligent Plans and Examinations (IPE) Ltd

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Document update	
29.4.21 (AS)	Original Facilitation Report
20.5.21 (AS)	Inclusion of draft MoU
23.5.21 (AS)	Inclusion of Project Plan
10.6.21 (AS)	Final summary and MoU

Abbreviations commonly used in this report

HNP / the draft NP	Holt Neighbourhood Plan
HRA	Habitat Regulations Assessment
LGS	Local Green Space
MOU	Memorandum of Understanding
NPPF	National Planning Policy Framework
NNDC	North Norfolk District Council
PPG	Planning Practice Guidance
SEA	Strategic Environmental Assessment
TC	Holt Town Council
QB	Qualifying Body

Useful sources of information on Neighbourhood Planning include the following:

[National Planning Policy Framework](#)

[Planning Practice Guidance](#)

[Locality](#) including:

- [Step by Step Roadmap Guide](#)
- [Making Local Green Space Designations](#)
- [How to assess and allocate sites for development](#)
- [Achieving well designed places through neighbourhood planning](#)
- [How to write planning policies](#)

Facilitation Summary

Intelligent Plans & Examinations (IPE) has worked with Holt Town Council, and in particular its Finishing Group and Town Clerk, to progress the Neighbourhood Plan towards submission to North Norfolk District Council.

A Facilitation Report and Health Check was undertaken on the neighbourhood plan to enable HTC to identify areas of its original submission, including the Basic Conditions Statement and Consultation Statement, that require updating and revision. HTC are committed to updating its plan and resubmitting as soon as practical and ideally before the end of 2021.

Key progress points include:

- The formulation by the TC of a Finishing Group consisting of three key Councillors and the Town Clerk with terms of reference;
- An independent Facilitation Report with Health Check (see below and Appendix 2);
- Obtaining an editable version of previous documentation;
- A series of Zoom meetings to discuss matters arising including the scoping of new plan content, liaison with North Norfolk District Council, resources and project planning;
- Liaison and agreement with NNDC who will undertake HRA and SEA Screening with consultation;
- A verbally agreed Memorandum of Understanding between HTC and NNDC following the Locality template (see Appendix 4) (to be signed within two weeks);
- A draft project plan with key tasks and milestones indicative of a November 2021 submission (See Appendix 3).

The Finishing Group are scheduling appropriate meetings to agree a short term project plan with key tasks. The aspiration is to follow a targeted approach to updating the neighbourhood plan where necessary with new content as applicable.

The District Council acknowledge its role in supporting the neighbourhood plan making process and offers it support to the TC as reflected in the MoU.

1. Overview

Facilitation Brief

1.1 Intelligent Plans & Examinations (IPe) was commissioned by Locality on the request of Holt Town Council to undertake an independent review of the Holt Neighbourhood Plan, to assist in moving the plan towards successful submission and to assist in addressing the perceived impasse between the Town Council and North Norfolk District Council.

1.2 Practically the Facilitation support requires the following:

- A review of the draft NP to determine what work is required (if any) to ensure that it meets the Basic Conditions and flag any areas where the group may need to consider updating the evidence (if issues identified); (see Appendix 2)
- A determination of the position of NNDC with regard to the draft NP and agreement in writing from the QB and NNDC as to the way forward for the NP and the work remaining to be completed so that NNDC can validate the draft NP and move to Reg 16 Consultation; (see Appendix 1 and to include a Memorandum of Understanding)
- A short summary report setting out the advice and support provided to the group, along with outcomes and options. This report should set out clearly the work required on the draft NP so that it can be submitted to NNDC.

1.3 This report is iterative. It will be updated to align with progress being made on the HNP and it will form the basis for discharging the terms of the Brief.

Neighbourhood Plans - background and procedural context

1.4 Neighbourhood Planning is designed to give communities, such as at Holt, the direct power to develop a shared vision for their area and to shape its development and growth. As the government's Planning Practice Guidance (PPG) notes: "*Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area*¹."

1.5 The PPG is clear that a neighbourhood plan should complement any existing local plan such as the North Norfolk Local Plan/Core Strategy: "*A neighbourhood plan should support the delivery of strategic policies set out in the local plan or spatial development strategy and should shape and direct development that is outside of those strategic policies (as outlined in [paragraph 13](#) of the revised National Planning Policy Framework)*²" It is therefore necessary for plan making bodies such as Holt Town Council to seek to work constructively with North Norfolk District Council and vice versa.

¹ [Paragraph: 001 Reference ID: 41-001-20190509](#)

² [Paragraph: 004 Reference ID: 41-004-20190509](#)

1.6 The Holt Neighbourhood Plan, if it is to proceed to referendum, must meet the Basic Conditions set out in the Town and Country Planning Act 1990 (as amended).³ In summary these are:

- having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;
- the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations (under retained EU law); and
- meet prescribed conditions and comply with prescribed matters.

A further prescribed Basic Condition requires that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites. (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended) in relation to the examination of neighbourhood development plans.)

1.7 It is therefore essential that the Holt Neighbourhood Plan demonstrably meets these basic conditions and this must be supported by adequate evidence.

1.8 In preparation, the PPG⁴ advises that a Town Council should work actively with other members of the community who are interested in the neighbourhood plan and its content.

1.9 The PPG makes clear that North Norfolk District Council must

- take decisions at key stages in the neighbourhood planning process within the time limits that apply;
- provide advice or assistance to a parish council, neighbourhood forum or community organisation that is producing a neighbourhood plan or Order as required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended);
- should
 - be proactive in providing information to communities about neighbourhood planning;
 - fulfil its duties and take decisions as soon as possible, and within statutory time periods where these apply;
 - set out a clear and transparent decision making timetable and share this with those wishing to prepare a neighbourhood plan or an Order; and

³ Paragraph 8(2) of Schedule 4B.

⁴ PPG Reference ID: 41-015-020160211.

- constructively engage with the community throughout the process including when considering the recommendations of the independent examiner of a neighbourhood development plan or Order proposal.⁵

1.10 The PPG makes clear that the Town Council, as a qualifying body, should be inclusive and open in the preparation of its neighbourhood plan and ensure that the wider community:

- is kept fully informed of what is being proposed;
- is able to make their views known throughout the process;
- has opportunities to be actively involved in shaping the emerging neighbourhood plan or Order; and
- is made aware of how their views have informed the draft neighbourhood plan or Order.

1.11 NNDC must satisfy itself that a draft neighbourhood plan submitted to it for independent examination complies with all the relevant statutory requirements albeit the authority is considering the draft plan against the statutory requirements set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). A local planning authority has to be satisfied that a Basic Conditions Statement has been submitted but it is not required to consider at that stage whether the draft plan or order meets the Basic Conditions.

1.12 Following submission, NNDC must publicise the HNP for at least 6 weeks to invite representations and notify relevant consultation bodies prior to sending the plan for independent examination.

1.13 Thereafter an independent examination tests whether or not a draft neighbourhood plan meets the Basic Conditions, and other matters set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). If successful, feasibly with recommended modifications, the HNP would be subject to a neighbourhood planning referendum organised by NNDC. If a majority vote in favour of the HNP then the plan is 'made' and becomes part of the formal development plan for the area.

⁵ See PPG Reference ID: 41-021-20140306 and 41-022-20150209.

2. The Neighbourhood Plan

Evolution – a summary

2.1 Work began on the Holt Neighbourhood Plan in 2013. The parish of Holt was designated as a Neighbourhood Area by NNDC on 2 December 2013.

2.2 A Steering Group was established with agreed Terms of Reference⁶ (ToR) that were last updated in 2017. (It is assumed that the Steering Group is no longer operational based on the dates in the ToR. It is understood that a reduced steering group, known as the 'finishing group' is now in place).

2.3 A community launch event was undertaken in October 2014.

2.4 A hiatus in activity appears to have occurred before a presentation was made to the Town Meeting in March 2017 which sought to 'relaunch' the NP and seek feedback on a Mission Statement and Objectives for the plan.

2.5 From June 2017 to December 2017 a consultation event and open Steering Group meetings were held to develop the policies and plan's content.

2.6 In January 2018 a 6 week consultation was held to comply with the requirements of Regulation 14. This was followed by a presentation to the Town Meeting in March 2018 to share outcomes of the consultation and thereafter a series of open Steering Group meetings were held which reviewed the responses received.

2.7 The HNP was forwarded to NNDC in September 2019 with an intent to be formally submitted. NNDC did not accept the submission as valid for the reasons set out in its correspondence dated 29.1.2020 (Appendix 1).

2.8 Thereafter, the progression of the HNP stalled. 2021 has seen the Town Council initiate a resumption of work on the HNP with a view to submitting the plan to NNDC under Regulation 15, whereupon public consultation and subsequent independent Examination can occur.

The Current Plan and Evidence

2.9 The Town Council has the following submission documents:

- Holt Neighbourhood Plan 2018-2038 Examination Version;
- Basic Conditions Statement, August 2019; and
- Consultation Statement, August 2019.

2.10 In terms of supporting evidence, the HNP and the Town Council website also provides the following documents:

- Sustainability Appraisal Report, June 2019;

⁶ See Consultation Statement Appendix 3.

- Sustainability Appraisal Scoping Report Final, November 2017; and
- Habitat Regulations Assessment Screening Report, August 2019.

2.11 There are no further evidence documents provided. However, the HNP refers to:

- The National Planning Policy Framework;
- The Holt Vision 2012;
- Building For Life 12;
- Historic England's Streets for All;
- At a Glance: a checklist for Development Dementia Friendly Communities;
- Workshop Feedback Summaries 2016;
- ONS Annual Survey of Hours and Earnings (undated); and
- Better Broadband for Norfolk project.

The Sustainability Appraisal Scoping Report 2017 contains some baseline information relevant to the parish including 2011 Census data and information from government departments/agencies.

Documents produced by/for NNDC referred to include:

- Core Strategy;
- Sites Allocations;
- North Norfolk Design Guide SPD;
- North Norfolk Landscape Character Assessment 2009;
- Holt Conservation Area Character Appraisal and Management Proposals;
- Parts of the NNDC emerging Local Plan Evidence Base including
 - Retails and Town Centres Uses Study 2017;
 - Strategic Housing Market Assessment;
 - Et al.

2.12 All supporting evidence should be collated into a single list and be publicly provided with appropriate hyperlinks.

3. The Neighbourhood Plan

Summary

3.1 The foundations of the HNP are provided by the existing submission documents. Appendix 2 (below) is an independent Health Check of the current plan following the standard Locality template. This provides observations and recommendations on the existing plan designed to increase the chances of a successful submission to NNDC and subsequent Examination.

3.2 The HNP, the Basic Conditions Statement and the Consultation Statement all require updating to reflect the passage of time. At present, the TC will be significantly hindered without access to editable versions of the previous submission documents which are held by their previous consultant.

3.3 Liaison with NNDC is recommended to address the SEA screening, the HRA screening and to ensure the HNP is in general conformity with the strategic policies of the development plan whilst having due regard to the PPG advice in relation to the emerging Local Plan.⁷

Foreword, Executive Summary and Introduction/Background

3.4 The first three sections of the HNP would benefit from increased clarity on the vision for the parish, the relationship to the Vision for Holt and a reduction in length of the narrative around plan production. A focus on sustainable development would helpfully address one of the basic conditions against which the HNP will be assessed at Examination.

Mission Statement, Objectives

3.5 The rationale for the Mission Statement and the way in which the objectives have been derived needs to be provided. This should include reference to community engagement (and evidence of the outcomes of early consultation). Without further explanation of why the plan sets out to do what it does, it is at greater risk of being considered unjustified and arbitrary.

3.6 The links between the Mission Statement, the Objectives, the Themes and the Policies should be made clearer in the narrative whilst the inclusion of monitoring indicators would ensure that the HNP is measurably successful over time. The HNP should include the latest update position on the emerging Local Plan. All maps should be checked for accuracy.

Sustainable Growth and Development, Wider Spatial Context etc

3.7 These sections should emphasise the way in which the HNP will support sustainable forms of development and complement the existing and emerging development plan.

⁷ PPG Reference ID: 41-009-20190509

3.8 The purpose of the Table in paragraph 6.4 is unclear and should be reviewed/deleted/amended.

3.9 Chapter 7 of the HNP contains the policies. The majority of policies require amendment to better meet government guidance that requires:

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared”.*⁸

Design and Character

3.10 The supporting text to Policies 1-4 should be clarified in support of the policies and their content.

3.11 Policy 1 contains 13 criteria which are not all clear, fully justified and in some instances replicate national policy. Consideration should be given to refining the policy, feasibly into two (or more) where issues of physical design (eg bullets 1, 2, 3, 4, 8, 9, 10) are dealt with separately from housing size and occupation (eg bullets 3, 5) and infrastructure matters (eg bullets 4, 12, 13).

3.12 Policies 3 and 4 require additional evidence as to their content which should take account of the emerging Local Plan.

Environment

3.13 Policies 5, 6 and 7 require review to avoid repetition of national policy and the citation of appropriate evidence which justifies their content. Consideration could be given to the designation of Local Green Spaces.

Tourism and Employment

3.14 The evidence for this section of the HNP is rather old and could be updated by existing evidence held by NNDC in relation to its emerging Local Plan (eg retail, economic needs etc). The evidence for the approach towards hotel accommodation needs to be clearer.

Leisure and Culture

3.15 There is some replication of content in this part of the HNP in relation to demographics and open space. The policies should be reviewed to ensure they are locally distinct and not replicating existing development plan policies.

⁸ PPG Reference ID: 41-041-20140306

Infrastructure

3.16 Policies 12-14 are broad and rather generic. There is insufficient clarity in the evidence and supporting text as to why they are needed and how they will be effectively implemented. They should be reviewed.

Monitoring/glossary

3.17 The monitoring of the policies is a helpful opportunity to ensure the HNP is successfully implemented. Some indicators of success should be included.

3.18 The glossary should be shortened.

4. Options for HNP Completion.

4.1 For completion of the HNP there are two primary considerations to bear in mind:

- The need to produce a plan accompanied by the appropriate documentation that enables NNDC to accept it as a valid submission under Regulation 15 of the Neighbourhood Planning Regulations and to proceed to Examination. In this respect, NNDC considers this will include the need for further work in relation to SEA and HRA Screening.
- The plan should be submitted on the basis that it has optimised its likelihood of being successfully examined against the Basic Conditions and being able to proceed with the minimum of modification to a referendum.

4.2 There are two main options for the TC to consider if the HNP is to be progressed:

A) Holistic Review

4.3 Whilst the HNP has been progressed to a relatively advanced stage, there remains an opportunity to ensure that the content of the plan is meeting the land use aspirations of the Town Council and the community.

A holistic review of the HNP would assess its structure and content to ensure that its suite of policies represent the best means of delivering appropriate beneficial change to Holt. Such a review would enable the introduction of new content to the plan as appropriate, for example provision for community facilities (cemetery), economic development and housing.

The review could be informed by a high level analysis of the strengths and weaknesses of the current plan which would inform those areas that require further work and opportunities for new content.

For example

Strengths	Weaknesses
Community led by the TC Experience of previous consultations	Passage of time – out of date Some generic policies Limitations in evidence
Opportunities	Threats
Scope to strengthen policies and ensure distinctive to Holt Scope to include new policy provision (eg cemetery, LGS, economic land) Include emerging Local Plan provisions	Not legally compliant (SEA/HRA) Insufficient evidence Consultation fatigue etc

A holistic review will require additional time and effort to complete. A further Regulation 14 consultation will be necessary which would affect the timescales for overall HNP completion. The resulting plan is likely to be more successful in achieving its aims for the parish. This would also ensure there is consultation on the NNDC SEA and HRA screening prior to submission.

B) Targeted Update

4.4 The existing plan, Basic Conditions Statement and Consultation Statement would be updated to reflect the passage of time and incorporate identified priority changes to areas of greatest risk to a successful examination. These would be identified by the TC, with regard to Appendix 2, in liaison with NNDC (governed by the MoU).

The cost and delay of reaching submission stage would likely be reduced albeit the resulting plan may not maximise the opportunities for positive change in the parish.

In addition, there is a risk that the Regulation 14 consultation may be considered undermined given that NNDC takes the view that the SEA and HRA information provided is inadequate. This can be resolved when the scale of the HNP updates and the new screenings are undertaken.

5. Stages for Completion

5.1 The timescales leading to submission to NNDC will be dependent upon the selected option and the capacity of the TC/NDCC to undertake the necessary updates.

- a. Option Selection
- b. Project Plan – to determine tasks and timescales
- c. Concurrent liaison with NNDC informed by Memorandum of Understanding
- d. Plan update
- e. Submit to NNDC

6. Conclusion

6.1 The HNP is not currently suitable for submission to NNDC under Regulation 15. The Town Council must determine the most appropriate option for HNP completion as set out above.

6.2 Thereafter a project plan will be devised to support the delivery of the revised HNP which will include the completion of SEA/HRA screening as managed by an agreed Memorandum of Understanding with NNDC.

Andrew Seaman

IPe – Advisor and Examiner
April 2021



Appendix 1

Validation Correspondence from NNDC (converted from original pdf file)

North Norfolk District Council
Holt Road, Cromer NR27 9EN Telephone 01263 513811

NORTH
NORFOLK
DISTRICT
COUNCIL

29.01.20

RE Holt Neighbourhood Plan

Dear Gemma,

Following the submission of the Holt Neighbourhood Plan documents I have now had the opportunity to review the documents and check for compliance and validation requirements.

The neighbourhood planning regulations require that the Council must satisfy itself that the required documents have been provided, are in the correct format and contain the level of detail to enable publication, public participation and examination. In addition, there are separate regulations that the Council must adhere to in regard European legislation, namely in the Environmental Assessment of Plans and Programmes.

Unfortunately, the submission cannot be registered at this time as the required documentation is incomplete and does not comply with the relevant legislation:

1. The regulations require that NNDC as the "competent authority" undertake any HRA screening and issue a subsequent screening determination prior to submission in order to inform the plans production;

Although a shadow HRA screening document accompanies the Draft Plan it is not of sufficient detail, accuracy, nor sufficiently up to date to be relied upon to issue a retrospective screening determination or confirm adherence to the required basic conditions.

2. SEA screening determination issued by a responsible body;

Following our comments at pre-submission consultation no up-to-date SEA screening appears to have been undertaken or determination requested from the Council in order to satisfy and conclude appropriately and accord with the required basic condition requirements. Unfortunately, the information/assessment contained in the accompanying documents is not of sufficient detail, accuracy, nor sufficiently up to date in order to be relied upon for the Council to conclude appropriately and issue the required SEA determination. The appropriate HRA assessment is also required to feed into such an assessment before any conclusions can be drawn on environmental effects.

3. A word version and or editable version of the Draft Plan; .
4. A full list including contact details of local and statutory consultees previously engaged/participated with during the making of the Draft Plan;
5. All background evidence and topic papers that supports and informs the proposed plan and basic conditions statements;

Full guidance on the required documentation at this stage is published on the [Council's web site](#)¹ under submission check sheet NPC2 and was contained in the Council's pre-submission commentary on the then emerging Plan [dated February 2018](#)² and published on our web site.

Once the Council has all the required Documents and can successfully validate these the Town Council will be able to resubmit and we will arrange the required consultation and subsequent examination. We will undertake the SEA and HRA screening for you, however it will take some time to schedule in the required work into our busy work programme and I would suggest that you seek an early meeting with myself and the team to explain in more detail the requirements and agree the next stages.

Irrespective of the technical aspects of verification and the legal requirements placed upon the Council I would respectfully suggest that you may wish to take the intervening time to review the documents not only for content, structure, and appropriate evidence but also in the areas of general conformity. The submission would appear to contain many conformity

issues, which we would be duty bound to raise at any examination. The accompanying statements appear to list policies but without supplying analysis or justification from which people will be able review and base any subsequent commentary on. You should be aware that where a neighbourhood plan contravenes significant elements of the Local Plan, then generally it will require an SEA.

There are also considerable inconsistencies throughout the SA Scoping Report November 2017, the consultation statement and basic conditions statement with regard to the assessment, interpretation, who and when the statutory consultees were consulted, how the responses were interpreted and reported and how these have subsequently been taking into account. Consequently, there is significant concern that the approach has led to a potentially inappropriate conclusion. It is due to these that I cannot rely on the work to conclude appropriately at this stage.

The preparation of neighbourhood plans and any SEA have become increasingly professional, part as a response to legal challenges but also due to the greater emphasis now being placed on providing complete (rather than selective) and robust evidence.

As previously advised a conformity check sheet of Local Plan policies is available on our web site and it is recommended that further detailed assessments are undertaken prior to resubmission and the Plan altered accordingly to remove conflict. As it stands the Draft Plan could be seen as misleading to the general public in its ability to provide an effective planning framework. You should equally be aware that it is not the role of the inspector at examination to do this on your behalf, but purely to assess the Plan against the adequacy of the tests. If, however such a review concludes policies are not in general conformity then this casts doubt on quality of the assessments around how the overall plan contributes to sustainable development and could put the entire Plan at significant risk if the accompanying documents are also not updated and refined. I would strongly advise that you reevaluate the work done so far prior to any further submission.

I fully understand that the preparation of Neighbourhood Plans is a sizeable and complex challenge and consequently we routinely advise, including in our published guidance, that Neighbourhood Plan groups should work closely and collaboratively

¹ <https://www.north-norfolk.gov.uk/neighbourhoodplans>

² <https://www.north-norfolk.gov.uk/info/planning-policy/neighbourhood-plans/holt-neighbourhoodplan>

with the professional planning staff at the local planning authority throughout the process in order to avoid potential issues and pitfalls such as these. Unfortunately, the approach taken in the preparation of the HNP by the steering group has been

far more isolated than it should have been, and as a result we now regrettably need to draw your attention to the aforementioned issues.

You may wish to consider obtaining a professional and independent pre-submission review of the Plan. Some practices and organisations that provide the pool of qualified independent inspectors to examine Neighbourhood Plans offer such a service and we would be happy to provide further details upon request.

I would welcome the opportunity to meet with you to discuss how you wish to proceed and your expectations, and look forward to hearing from you in due course. .

ards



Regards

Iain Withington MRTPI Planning Policy Team leader
01263 516034

Appendix 2

Holt Neighbourhood Plan

Produced by Holt Town Council

Health Check – April 2021⁹: Undertaken by Andrew Seaman BA (Hons) MA MRTPI

Summary of Recommendations

1. Process

- The Holt Neighbourhood Plan (HNP) has been developed by the Town Council. Much work has clearly been undertaken, including a pre submission Regulation 14¹⁰ public consultation in 2018, prior to the submission of the HNP to North Norfolk District Council under Regulation 15 in 2019. At this point NNDC were unable to accept the TC submission for the reasons set out in correspondence dated 29.1.20.
- A Consultation Statement and a Basic Conditions Statement have been undertaken. These are important documents. The Consultation Statement and Basic Conditions Statement require further review in order to be finalised prior to the resubmission of the HNP to NNDC. These should contain the details of procedural compliance and up to date consideration of the applicable Basic Conditions that should be met by any Neighbourhood Plan (NP) intending to be made. (see below).
- Further liaison and correspondence with NNDC will be necessary to ensure, as far as practical, that the District Council is in agreement with the process of the HNP production and its final content. NNDC have offered to undertake a SEA and a further HRA. This should be accepted and undertaken. In the light of the new screenings, consideration should also be given to whether the SEA and HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage. Reference within the Basic

⁹ This Report is based on the information made available which primarily constitutes: the draft NP and Appendices A-F; the NP website, the NNDC Local Plan.

¹⁰ Town and Country Planning, England, The Neighbourhood Planning (General) Regulations 2012.

Conditions Statement will be required. Consequently, there is presently insufficient evidence on either issue to suggest that the legal requirements have been met.

2. Content

- The HNP is broadly drafted to take into account national planning policy which includes the requirement to plan positively for sustainable forms of development. However, the HNP has limited references to ‘sustainable development’ within its text. The HNP could therefore helpfully be amended to provide more explicit explanation as to how the plan will contribute towards sustainable forms of development. This should be rectified with additional content/commentary within the plan with cross references to the amended Basic Conditions Statement.
- The HNP does not have a stated Vision albeit does have a ‘mission statement’. It would be helpful to set out a brief explanation as to how, in all its parts, this has been derived with reference to the evidence base. The plan contains 14 separate policies grouped within 5 Themes (Design and Character, Environment, Tourism and Employment, Leisure and Culture, Infrastructure). The derivation of the mission statement and the links/origins to the themes should be more clearly explained, feasibly with additional text to the HNP and the Consultation Statement. The policies themselves require refinement. They should be clearer in their purpose, ensure they are supported by specific evidence where necessary and be positively stated land use policies. All should be reviewed to be more effective in implementation.
- Liaison with NNDC should be made to ensure the general conformity of the HNP with the current strategic policies of the relevant development plan and to take account, where appropriate, of the emerging new Local Plan.¹¹ This issue is addressed to a degree in the Basic Conditions Statement but would benefit from more analytical narrative as to how the condition is met. A ‘Memorandum of Understanding’ leading to a ‘Statement of Common Ground’ with NNDC would be a useful addition to the evidence base prior to formal submission for Examination.
- A more detailed Implementation and monitoring section could be introduced explaining how the policies will be monitored for their effectiveness. A helpful guide is available [here](#).

Andrew Seaman

¹¹ PPG Reference ID: 41-009-20190509.

Part 1 – Process

	Criteria	Source	Response/Comments
1.1	Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?	Holt NP Basic Conditions Statement	Yes, this requirement is met to date. Page 29 of the HNP (Basic Conditions Statement) confirms that the Town of Holt was confirmed as the designated area by NNDC on 17 April 2019. A map of the designated area is included on page 6. It would be useful to incorporate in the Basic Conditions Statement a copy of the confirmation from NNDC.
1.2	If the area does not have a Town council, have the necessary statutory requirements been met in terms of the designation of the neighbourhood forum?	Holt NP Basic Conditions Statement	The HNP is being produced by Holt Town Council.
1.3	Has the plan been the subject of appropriate pre-submission consultation and publicity, as set out in the legislation, or is this underway?	Holt NP Consultation Statement	The evidence which currently confirms the process of community involvement and engagement requires updating. The Consultation Statement would benefit from additional details of how consultation was undertaken and should ensure it contains adequate documentary evidence to demonstrate that the legislative requirements have been met. At present it cannot be concluded that the HNP has been the subject of appropriate pre-submission consultation.
1.4	Has there been a programme of community engagement proportionate to the scale and complexity of the plan?	Holt NP Consultation Statement	The Consultation Statement should confirm the extent of community involvement and associated activities which should include an analysis of outcomes and how they have influenced the current HNP. At present there is insufficient evidence of the extent of community engagement albeit a number of consultation activities have been undertaken. The methodology, results and actions arising from each activity should be provided in the Consultation Statement, including those between 2014 and 2018.

1.5	Are arrangements in place for an independent examiner to be appointed?	No source	<p>There is no information provided on this. Whilst the qualifying body has not yet reached the stage of submitting the HNP to NNDC under Regulation 15, it is advised that discussions could helpfully begin or be scheduled on how to identify a suitable independent examiner.</p> <p>Whilst the general approach is to assess the resumes/CVs provided by prospective examiners, you may also find it helpful in coming to a decision by reading examples of their reports on other Neighbourhood Plans.</p>
1.6	Are discussions taking place with the electoral services team on holding the referendum?	No source	It is not yet appropriate to put in place arrangements for a Referendum after the examination of the Plan. However, as the Plan continues to advance, discussions should be held with NNDC
1.7	Is there a clear project plan for bringing the plan into force and does it take account of local authority committee cycles?	No source	There is no process set out for bringing the HNP into force. This could be developed in liaison with NNDC.
1.8	Has a SEA screening been carried out by the LPA?	Holt NP	<p>No SEA screening has been undertaken by NNDC.</p> <p>A Sustainability Appraisal which includes a SEA has been carried out by the TC (consultant).</p> <p>This must be completed before submission of the Plan, and therefore form part of, the HNP consultation. This should include clearer evidence of the liaison with key stakeholders such as Natural England, the Environment Agency and others. The content of the SEA should demonstrably inform the content of the draft plan.</p> <p>Consideration should be given to whether the SEA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.</p>
1.9	Has a HRA screening been carried out by the LPA?	Holt NP Basic Conditions Statement	A HRA has been undertaken albeit its content is not fully accepted by NNDC. NNDC are willing to undertake a HRA (and SEA) for the Town Council. This offer should be

			<p>accepted. Again, consideration should be given to whether the HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.</p> <p>Attention is drawn to the fact that the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 were made on 5 December 2018 and came into force on 28 December 2018. These amend the prescribed Basic Condition related to Habitats Assessments - the revised Basic Condition took effect from 28 December 2018. See the following link: http://www.legislation.gov.uk/uksi/2018/1307/contents/made (Section 3).</p> <p>This amendment follows the ruling of the European Court in People over Wind and Sweetman on 12 April 2018.</p>
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Part 2 – Content

	Criteria	Source	Response/Comments
2.1	Are policies appropriately justified with a clear rationale?	Holt NP Basic Conditions Statement	<p>The HNP has no Vision but does have a Mission Statement. It would be informative and helpful to set out how the Mission Statement has been derived, particularly with reference to any community engagement on the point. Clarification as to whether this represents the Vision for the parish would be helpful.</p> <p>The HNP has 7 objectives and 5 themes. It is unclear how and why these have been identified (eg from any consultation analysis) and this should be addressed. The Consultation Statement could helpfully set out in more detail how these were identified. The themes address: design/character, environment, tourism/employment, leisure/culture, infrastructure. Each Theme has a total of 14 associated policies.</p> <p>The policies are generally positive. However, there is a necessity to ensure that the policies are justified and are clearer¹² in their wording and purpose so as to aid future effective implementation.</p> <p>There is useful advice to be found here: https://neighbourhoodplanning.org/wp-content/uploads/Writing-planning-policies-toolkit-HK-071218-0907-COMPLETED-JS-complete-.pdf</p> <p>Each policy is clearly identified by a separated and colour coded text box. There is no doubt what constitutes proposed planning policy.</p> <p>Many of the policies would benefit (and require) review/redrafting to ensure that they have regard to national policy, are justified and capable of effective implementation. The supporting text to the policies of the HNP often does not cite sufficient evidence and quite frequently includes issues and subject matter which is broader than the eventual policy which follows. Generally there is a need for more focussed supporting text/justification of each specific policy.</p>

¹² See PPG Reference ID: 41-041-20140306.

2.2	Is it clear which parts of the draft plan form the 'neighbourhood plan proposal' (i.e. the neighbourhood <i>development plan</i>) under the Localism Act, subject to the independent examination, and which parts do not form part of the 'plan proposal', and would not be tested by the independent examination?	Holt NP	<p>The HNP is supported by a contents table and runs to 96 pages. The document is legibly laid out.</p> <p>The Policies are clearly separated from 'Community Projects'. Subject to clarifications (as recommended) there is sufficient clarity as to what is the HNP and what will be the subject of examination.</p>
2.3	Are there any obvious conflicts with the NPPF?	Holt NP	Section 3 below identifies matters of potential conflict with the National Planning Policy Framework (NPPF) which should be resolved.
2.4	Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?	Holt NP Basic Conditions Statement	<p>The HNP is drafted in a broadly positive manner albeit there is scant reference in support of sustainable forms of development. The plan should be revised to explain clearly how the HNP will contribute to the achievement of sustainable development.</p> <p>The Basic Conditions Statement acknowledges the principle of sustainable development. However, there is insufficient detail provided, either within the HNP or in the Basic Conditions Statement, as to how this will be secured. More narrative explanation is required and recommended.</p>
2.5	Are there any issues around compatibility with human rights or EU obligations?	Holt NP Basic Conditions Statement	There is little specific information on this point. From an assessment of the documents received there would appear to be no outstanding issues regarding compatibility with human rights albeit this must be explained further in an updated Basic Conditions Statement. For example, an equalities impact assessment could be completed.
2.6	Does the plan avoid dealing with excluded development including nationally	Holt NP Basic Conditions Statement	Yes, the HNP does avoid dealing with such excluded development, and there are no potential issues regarding this matter.

	significant infrastructure, waste and minerals?		
2.7	Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?	Holt NP Basic Conditions Statement	<p>There is no current consensus between Holt TC and NNDC.</p> <p>This should be remedied (by further minuted meetings/correspondence) before submission. Any areas of obvious disagreement should be obviated or minimised. A statement of common ground would be helpful.</p> <p>The Town Council should consider the Locality advice on establishing a Memorandum of Understanding with NNDC (and others). A guide is available here. This could subsequently lead to a Statement of Common Ground.</p> <p>It cannot be concluded at the present time that there are no potential issues of general non-conformity (i.e. disagreement) with the strategic development plan policies of the extant development plan (as flagged in Regulation 14 consultation comments). This matter should be addressed with additional details within the Basic Conditions Statement.</p> <p>Advice on the issue of ‘conformity’ is available here.</p>
2.8	Are there any obvious errors in the plan?	Holt NP	Some suggestions are made in Part 3 below.
2.9	Are the plan’s policies clear and unambiguous and do they reflect the community’s land use aspirations?	Holt NP	<p>Detailed comments are made below on the content and drafting of the HNP’s Policies.</p> <p>Various policies would benefit from greater clarity to aid their implementation, and a further ‘sense check’ and potential refinement to ensure that they are clear land use policies and not general assertions of aspiration (which might be contained to a degree within the text of the HNP, balanced with the advice in the PPG¹³).</p>

¹³ See PPG Reference ID: 41-004-20190509.

Part 3 - Detailed Comments

1. These detailed comments address all matters, both of significance and of a more minor nature, across the current HNP and are presented in Page order.
2. Title page. The plan period should be reviewed/amended on the title page. For example, 'Holt Neighbourhood Plan 2021 – 2038'.
3. Page 3. The foreword could be reviewed to reflect the current priorities for the town and parish in the national context for sustainable development. The second paragraph could be more positively worded; as an example for consideration: "The Holt Neighbourhood Plan will have a positive impact on many aspects of possible improvements and future development. We have to be realistic about housing in that there is a necessity for more homes is nationwide and we can ensure that Holt's allocation will be well designed and appropriate. we shall not escape certain numbers being allocated to Holt. However, with a Neighbourhood Plan addressing topics such as character, style and size, we at least can guide planning influence development to suit the needs of our community. own residents and necessary infrastructure. We shall always have to compromise to some degree, but The Holt Neighbourhood Plan will be a document which supports sustainable development and gives legal weight and good reasoning to our choices."
4. Page 4. The 2nd sub-heading refers to the protection of green space and the bullet points recite the criteria within the NPPF which relate to designated Local Green Space (LGS). However, the HNP does not subsequently include any such LGS nor does it refer to these criteria again. Consequently there is an inconsistency between the foreword and the content of the plan which should be resolved.

The foreword includes a 'Vision for Holt'. However, this Vision is not subsequently reiterated within the HNP which includes a Mission Statement. It would be helpful to explain how the Vision was derived (for example with reference to community consultation and feedback etc) and how that relates to the Mission Statement.
5. Page 5. It would be helpful if the map of the designated boundary was more clearly presented and the date of designation should be included.
6. Page 6. A contents page is always helpful and good to see.
7. Page 8. Paragraph 2.1.4 (and elsewhere) should be updated to reflect the passage of time since the HNP was drafted. For example, it could say that the HNP covers a period to 2038 with a review intended every 5 years.
8. Page 11. Section 2.3 rehearses the Holt Vision Document. This section could be more clearly explain why it is relevant to the HNP (for example, how has it informed the work undertaken for the HNP (if it has)?).

9. Pages 12-18 explains how the HNP process has been undertaken leading to referendum. There is scope to edit and reduce the length of this narrative which does not add substance to the content of the plan itself. For example, a shorter summary could cross reference the Consultation and Basic Conditions Statements where the details could be contained.

Map 3 repeats Map 1 and seems unnecessary.

Paragraph 2.6.2 repeats paragraph 2.5.2 unnecessarily.

Paragraph 2.7.2 refers to a community survey in 2014. The details of the survey, its responses, the analysis and conclusions drawn should be referenced and provided in evidence. The current version of the Consultation Statement does not include sufficient detail of this key activity and should be updated.

Similarly, paragraph 2.7.3 refers to workshops led by Planning Aid. It would be helpful to include the details of these and their outcomes in the Consultation Statement. The Consultation Statement does not contain substantive details of how the early engagement work was undertaken; for example, HNP paragraph 2.7.5 refers to articles in The Chronicle but these (from 2014) are not included. Screenshots of the early website would be helpful, plus details of the letter sent to businesses and households.

The Consultation Statement should also explain the apparent hiatus of activity between 2014 and the Community Consultation Event in June 2017. A narrative explanation with reference to the feedback received should be provided explaining how the Mission Statement, objectives and themes were derived – this will helpfully provide the evidence for the Examination as to how the priorities of the HNP have been selected with due engagement with the community.

10. Page 19. The derivation method for the Mission Statement should be explained (ie with reference to the community survey and other feedback). Additionally the relationship between this Statement and the Vision on page 4 should be clarified.
11. Page 20. Similar to above, the derivation of the specific objectives should be explained briefly within the text (with any cross referencing to the Consultation Statement). For example, the analysis of the survey and other community feedback could be cited in support of the 7 objectives identified. It would also be helpful to set out how the Vision/Statement and the objectives informed the identification of the 5 policy themes within the plan. The objectives do not explicitly include any reference to the natural environment which may represent an omission, particularly in light of the

environmental objective which underpins national policy (see NPPF paragraph 8) and the specific content of the HNP which, in places, incorporates matters affecting the natural environment.

The relationship of the sections of the plan to one another is critical if the HNP is to be effective in its operation: essentially, the Vision/Mission Statement is delivered by ensuring the Objectives are met. To meet the Objectives the HNP has identified 5 Themes within which individual policies are located. The implementation of the policies should ensure the Themes are addressed, the Objectives are met and the Mission Statement delivered. Therefore there is scope to diagrammatically illustrate this relationship within the plan feasibly supported by a table along the following lines:

Mission Statement	Objectives	Themes	Policies	Monitoring Indicators
As the gateway to the North Norfolk coast, Holt will be recognised as an historic market town, based in a rural setting with a vibrant town centre. Harnessing its growth potential, whilst retaining a strong local identity and distinctiveness.	1) to preserve the character of Holt, including the spatial balance between the rural, built and historic environment, character and ethos whilst improving design based on styles in keeping with the locality.	Design and Character	Policy 1 Design and Character Policy 2 Policy 3 Policy 4	To be devised (possibly in association with NNDC) Eg: proportion of developments incorporating 1 and 2 bedroom homes. etc
	2) etc	etc	etc	etc

12. Page 21. Section 5 of the HNP refers to ‘sustainable growth and development’. There is an opportunity here to explicitly confirm (with reference to the updated NPPF) that the plan seeks to contribute to the achievement of sustainable development thereby affirming that the relevant Basic Condition will be satisfied.

To maintain a tone of positivity, paragraph 5.3 could simply say: “The HNP is not anti-development and the community understands the need to accommodate housing growth...”

13. Pages 22 – 27. Section 6 is helpful in principle but could be shorter and needs to be updated to reflect the progress of NNDC on its new Local Plan and feasibly with regard to land that may have been developed over the last two years. The accuracy of Map 4 should be verified with NNDC.

Paragraph 6.4 seems unduly long and the purpose of its inclusion could be clearer. If the purpose is to illustrate that the HNP has had due regard to the existing development plan then this could be more succinctly summarised with the detail (as shown in the blue table) relocated to the appropriate section of the Basic Conditions Statement.

14. Page 28. The emerging Local Plan will have developed further since the current version of the HNP was produced. Consequently, Section 6.5 should be updated to reflect any changes that affect Holt (including the intended adoption date which is likely to be 2022 onwards).
15. Page 29. Map 5 may require updating in line with the emerging version of the Local Plan. The boundary positions shown on Map 6 should be double checked.
16. Chapter 7 of the HNP contains the policies of the plan set within its 5 themes. As noted above, the rationale for the themes should be explained (eg, why these 5 in particular, were they derived from the community engagement exercises?). Structurally, Chapter 7 takes each theme in turn and provides narrative supporting text/supporting reasoning for the individual policies which follow. This is of critical importance in justifying the content of the plan and it should always ensure that it is cogent, cohesive and is supported by sufficient evidence of why policies are required and how they will be effective in their implementation. These sections should be reviewed for their clarity and relevance to the policies which follow.

It is important to note that as part of any Examination, the policies will be scrutinised particularly in relation to how they meet the expectations of the government's PPG which sets out that "A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared."¹⁴

Furthermore, Localities publish helpful advice¹⁵ on how to write planning policies which includes some top tips on how to construct an effective policy and how to ensure it is linked to the vision and objectives. This includes:

- The need to avoid duplication with issues covered elsewhere in the development plan;

¹⁴ PPG Reference ID: 41-041-20140306..

¹⁵ <https://neighbourhoodplanning.org/toolkits-and-guidance/write-planning-policies-neighbourhood-plan/>

- The need to be clear and precise (keep things simple); and
- The need to ensure policies are supported by evidence.

The advice also contains some examples of possible policy wording which may be helpful including the following structural suggestion:

- Introduce each policy with a short explanation that provides any necessary context and robust evidence behind its inclusion;
- Summarise the intent of each policy;
- Word your policies clearly and concisely;
- Visibly separate the actual policies from other text – many plans use boxes and/or put policy text in bold/italics; and
- Clearly number the policies to aid navigation around the plan - it is customary to use the letters relating to the different topics – e.g. Housing policies are numbered H1, H2, H3; Open Space policies are numbered OS1, OS2, OS3 etc.

As currently presented the HNP policies do not universally meet these requirements. It is recommended that each of the policies of the HNP be subject to a review with this advice in mind.

Design and Character

17. Pages 32-42 are the explanatory text and reasoned justification for Policies 1-4 which follow. This section is important in explaining why the policies are required and in setting out the evidence which supports their individual content. As currently presented, pages 32-42 contain a raft of narrative which would benefit from a clearer structure and presentation. For example, the transition from an explanation of Building for Life 12 (paragraphs 8.6-8.11) to population demographics (paragraph 8.12 onwards) is not clear in terms of the narrative that the Plan is explaining and which ultimately should support Policy 1. It is possible that the use of sub-headings would be helpful (eg Importance of Design within Holt, Demographics and Design, etc) albeit there would be benefits to reviewing the intent of the Themes and the suitability of the topic matter which is included within each.
18. The content of the supporting text should be checked and updated, particularly the latest housing need figures which will have altered (due to changes in the method of calculation) since the HNP was drafted. The provision of hyperlinks or signposting to where the supporting evidence can be found is necessary (paragraph 8.42). The evidence base of NNDC in support of its emerging Local Plan will likely be helpful.
19. Policy 1 itself consists of 13 separate bullet points which represent criteria that new development will be expected to meet. However, the policy is broad in its content, seeking to address general design considerations, house size and development mix, affordability and occupation, access and roads, water infrastructure and arboricultural matters. Consideration should be given to refining the policy, feasibly into two (or more) where issues of

physical design (eg bullets 1, 2, 3, 4, 8, 9, 10) are dealt with separately from housing size and occupation (eg bullets 3, 5) and infrastructure matters (eg bullets 4, 12, 13).

20. Regardless, the criteria themselves should ensure that they do not repeat either national policy or existing development plan policy as this would be unnecessary.¹⁶ For example, bullet point 2 repeats the statutory provisions which apply to development in Conservation Areas and therefore is not required in a planning policy; furthermore, the NPPF already requires that good design should contribute towards high quality buildings and places (paragraph 124). The policy criteria should be evidentially relevant to Holt which would ensure that the objectives and mission statement of the HNP are capable of being delivered. For example, bullet point 1 is a general assertion that design should reinforce a strong sense of place but there is no substantive reference in either the policy or in the supporting text as to what that sense of place may consist of (for example reference to any character appraisal of the town or analysis of local building forms). It is recommended that this be reviewed to ensure that the design aspirations of the HNP are clearly set out within the Holt context so that decision makers and developers are clear as to what is likely to be required in terms of appropriately designed new developments. Further liaison with NNDC on the content of each policy would be prudent to ensure that the HNP does not repeat (or potentially unjustifiably conflict) with the existing development plan (or indeed the emerging Local Plan as far as is relevant).
21. As alluded to above, the retained criteria must be justified by evidence. Therefore the specific criteria which require a garage in the curtilage of each dwelling or requiring all new roads to an adoptable county standard should be explained. Currently, there is a risk that such aspirations are not justified, not deliverable and would not contribute to an effective plan. For example, if the purpose of requiring a garage is to ensure adequate off street parking to maintain the character of the town, then this should be stated but, if so, the policy may require amendment to simply require adequate off street parking rather than a specific garage.
22. Policy 2 relates to ‘Dementia Friendly Communities’. This is clearly relevant to Holt albeit there is scope for the policy to be more strongly worded: for example “Development proposals will be expected to incorporate the principles of dementia friendly communities unless demonstrably impractical, ...etc”.
23. Policy 3 relates to ‘Residential Care Accommodation’. The policy is broadly supported by the assertions in the supporting text (paragraphs 8.12-8.15) but this should be refined further with evidence of the particular needs which may apply to Holt or at the very least North Norfolk, drawing on the most recent statistical support that exists. At present the policy is generally supportive of new residential care provision but it is unclear what the level of need is and why a specific policy is therefore required in the HNP. Ideally, the policy should be supported by specific evidence of needs for this type of

¹⁶ NPPF, paragraph 16 f).

housing (eg a local housing needs survey perhaps?). Critically, the final sentence of the policy requires evidence of identified local needs but how this is to be demonstrated is not explained whilst the reference to other policies of the development plan (here and elsewhere) is unnecessary (as all relevant policies apply to all schemes at all times).

24. Policy 4 relates to 'Affordable Housing' and introduces the concept of a local lettings policy for the allocation of homes to Holt parish residents. As noted above, the HNP should be reviewed to assess whether a policy on affordable housing is best located within a theme/section of 'Design and Character'. Nevertheless, this will be a critical policy for any future examination where the evidence for its inclusion and content will be scrutinised. While the intention of the policy is clear, the justification for its detail is not. It is noted that NNDC raised reservations on its content and its relationship with the existing and emerging policies of the development plan, including Core Strategy policy HO2. Therefore, the wording of the policy must be explicitly supported by local evidence (eg the rationale for up to 25% and the nature of the 'cascade'). It is recommended that further liaison with NNDC be undertaken to seek a mutually beneficial policy proposal that will be robust at the point of HNP Examination.

Environment

25. Pages 47-55 provide the supporting justification to Policies 5, 6 and 7. Paragraph 9.2 helpfully refers to the public perception of landscape value and this should be reinforced with a particular citation of the evidence (feasibly with a cross reference to the Consultation Statement). Similarly, paragraphs 9.15 and 9.16 identify the importance of connectivity and access to the countryside which should be supported with evidence from the public engagement exercises.
26. The HNP does not identify any Local Green Spaces (LGS) as provided for by the NPPF (paragraphs 99-101). Alternatively, Table 1 identifies a number of 'important open spaces' but the evidence for how these were selected is absent (not listed at paragraph 9.31) and should be provided. Furthermore, the relationship between Policy 6 of the HNP and Policy CT1 of the Core Strategy should be more clearly set out – for example it is not clear how the HNP 'important open spaces' equate to the land protected by Policy CT1. This should be clarified and, if practical, agreed with NNDC.

However, Table 1 includes open spaces which may satisfy the LGS criteria. It is recommended that the HNP is reviewed in this respect, particularly as to whether the formal designation of LGS is likely to provide greater protection for identified spaces. Should the HNP wish to designate LGS, further evidence would be required setting out how the spaces were selected with due regard to the criteria of national policy; helpful advice is available [here](#) and NNDC have produced a guide available [here](#).

27. Policy 5 supports biodiversity. However, it could be more forcefully constructed (to reflect provisions in the Environment Bill)¹⁷ to require biodiversity gains relevant to (and within) the parish. NNDC may be able to assist on this point.
28. Policy 6 could be amended to reflect the creation of LGS designations if applicable and would thereby distinguish itself from the provisions of the current development plan (policy CT1).
29. Policy 7 relates to heritage protection but as worded is a generic policy that repeats the provisions of national policy and the development plan. It is therefore unnecessary and could be deleted. Alternatively, it should be amended to be more specific to Holt and its assets.

Tourism and Employment

30. Pages 58 to 62 establish contextual background to the economy within Holt. Whilst some of the information is helpful, the section would benefit from further review to ensure it is specific to Holt, supported by publicly available evidence and is clear in how it relates to the policies of the HNP.
31. Paragraph 10.1 should make clear who identifies Holt, Cromer and Sheringham as performing complementary roles (NNDC, Chamber of Commerce, TC?).
32. Paragraph 10.9 refers to a 2017 town centre uses study which is now rather old evidence. Ideally this should be updated by a specific analysis of Holt town centre which could show vacancy rates, retail uses etc. Overall, the purpose of paragraphs 10.9 to 10.14 should be more clearly explained, particularly in relation to the policies which follow. At present the HNP is rather repeating national policy and providing statements of fact without consequential analysis.
33. Paragraph 10.15 requires amendment to ensure it is cogent.
34. The evidence referred to within paragraph 10.19 needs to be publicly available and signposted (eg A Vision for Holt, the Holt Emerging Policy Statement Discussion Document et al).
35. Policy 8 relates to 'Employment Growth'. The policy supports new employment with the exclusion of new hotel accommodation but the reasoning for this should be set out in the supporting text. The reference to other policies of the development plan is unnecessary and should be omitted. The 4th bullet point also requires further explanation with reference to any available evidence. For example, the policy only supports small scale development

¹⁷ View progress here: [Environment Bill - Parliamentary Bills - UK Parliament](#)

on existing employment sites but this does not explicitly align with national policy which does not restrict the scale of development which, in this instance, would be controlled to a degree by bullet point 1. This should be reviewed for consistency with national policy and the development plan, avoid repetition and be amended as necessary.

36. Policy 9 relates to hotel accommodation but would benefit from further explanation in the supporting text as to why its requirements are necessary and how it relates to (and is in general conformity with) Core Strategy Policy EC7. Furthermore, there appears to be a typo in the use of the word 'boundary/boundaries'. The reference to other policies is once again unnecessary and the policy should ensure it does not simply repeat other provisions of the development plan (eg Core Strategy Policy EC7).

Leisure and Culture

37. Pages 65-69 provide the context for Policies 10 and 11. However, page 65 repeats information on the age structure of the community already cited in the HNP. This should be revised.
38. Paragraph 11.4 refers to NPPF paragraph 17, but this has been updated and the HNP should be revised accordingly.
39. Paragraphs 11.15-11.18 refer to playing fields and open spaces which appear to overlap with those referenced within the Environment section of the HNP, for example the Kelling Road Sports Club and the Methodist Memorial Gardens. Such overlap should be clarified, feasibly by ensuring a single reference is made within the plan linked, for example, to the identification of LGS.
40. Policy 10 supports the provision of additional community facilities. There is beneficial scope to edit the policy to be more focussed on the needs of Holt if they are quantifiable (eg new facilities) – is there evidence of local needs in this respect? This will ensure the policy is distinct to the community. The reference to other policies is unnecessary.
41. Policy 11 could replace 'the Developer will be required to demonstrate' with 'development proposals must include' to be more effective in its implementation.

Infrastructure

42. Pages 71 -74 provide the context for Policies 12-14. The references within this section to the NPPF need to be updated as does the reference to the Better Broadband for Norfolk initiative (paragraph 12.7).

43. Policy 12 supports the roll out of superfast broadband. The policy is rather generic and could be more targeted in its content. For example, it could explicitly state that proposals for such development will be supported (albeit subject to acceptable impacts on amenity and character) and could consider whether provision should be made within new developments for infrastructure to accommodate appropriate technologies.
44. Policy 13 should be reviewed as it is unclear precisely what is required in terms of traffic quantification (traffic assessment/statement?) and why a threshold of 11+ dwellings has been set. National policy should be considered in setting the terms of Policy 13 as the former refers to significant and unacceptable impacts arising from development on the highway network. Liaison with the Highway Authority and NNDC on the policy wording may be fruitful to ensure the policy adds value to the development plan, has due regard to national policy and will be effective in its operation.
45. It is unclear why Policy 14 (healthcare) is currently required. For example, are there quantifiable deficiencies now (or in the future) which could be evidenced by the supporting justification and addressed by the HNP Policy requirements? As currently presented, the policy does not secure any specific level of additional health infrastructure.

Delivery, Implementation and Monitoring

46. It is good to see a delivery and implementation section within the HNP. However, it is unclear as to how the policies will be monitored for their success in contributing to the vision for the town. Feasibly specific monitoring indicators could be devised for each Theme/Policy which can be reviewed to assess the success of the plan and its potential need for amendment in the future.
47. The glossary, whilst helpful in principle, is too long and should be reviewed to ensure its definitions are justified (for example 'affordable housing' is defined in the NPPF; terms such as 'curtilage' have no need to be defined in the HNP etc).

Basic Conditions Statement

48. The available Basic Conditions Statement is dated August 2019 and runs to 38 pages excluding the appendix. The Statement will require updates to reflect the passage of time that has elapsed up until the point of submission to NNDC.

In particular, Section 3 and Tables 1 and 2 will need to be revised to incorporate changes that may have occurred with regard to the emerging Local Plan of NNDC and to review how regard has been had to the NPPF. Liaison with NNDC is recommended on these matters.

The applicable Basic Conditions that must be met by the HNP exclude items b) and c) of paragraph 3.2 and consequently analysis is not necessary in paragraphs 3.11 to 3.16.

The Basic Conditions Statement should include evidence of how the plan is compatible with Human Rights and therefore paragraph 3.37 requires expansion; NNDC may be able to advise further on this matter.

Consultation Statement

49. The Local Plan Regulations require the submission of a consultation statement alongside the HNP to NNDC. A Consultation Statement should (see the Neighbourhood Planning Regulations) fulfil the following:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted; and
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The available Consultation Statement is dated August 2019, acknowledges the regulatory requirements and runs to 24 pages excluding appendices.

The current statement requires further updates to reflect the passage of time. In addition, the Executive Summary at paragraph 1.3 highlights three key messages arising from the local community:

- Affordability of new homes and access to affordable housing;
- Town centre parking; and
- Pedestrian accessibility from the other side of the bypass and suitability of footpaths for those with mobility difficulties in the town centre.

However, these matters are largely not addressed within the HNP and therefore there appears to be a disconnect between the Consultation Statement summary and the HNP, specifically in that the final Plan does not address the community issues. This should be resolved.

Sections 3 and 4 of the Consultation Statement describe the creation of a Communications Strategy and the timeline of activities undertaken in producing the HNP. However, at present there are gaps in the detailed evidence of how consultation was undertaken, when and with what results. This should be rectified in an updated Consultation Statement. Ideally, the Consultation Statement should explain how the communications strategy was applied to the stages of HNP production, including the activities from 2013-2017. For example, the table at 4.2 refers to articles within the Holt Chronicle but Appendix 6 only contains examples from 2017/2018 which omits the early stages of community engagement. This should be supplemented by evidence of how the community were engaged throughout the HNP process.

Similarly, the website screenshots only relate to 2018 and presumably additional evidence can be provided of how the internet was used to publicise the HNP and how engagement was sought/received. This should be included.

A narrative description of what comments were received and how they informed the mission strategy, objectives, themes and policies of the plan should be added to Chapter 4; this would expand the summary comments of the tables provided which refer to the responses received (with only limited detail). Evidence should be provided (in appendices) detailing in particular the responses and outcomes of the engagement activities (including those before 2018); for example, where is the evidence which supports the summary table of 4.16 to 4.18 (Policy Development Workshops etc)?

Section 5 of the Consultation Statement addresses the Regulation 14 Consultation. An expansion of the narrative on pages 21-24 is recommended. This should provide more explanation and detail about the responses received and how they were assessed, considered and how the HNP was altered as a result. Whilst the comments are contained in Appendix 13, the bullet point summary of main issues/concerns is a limited list which, for example, does not explicitly reference the environment or tourism (which are key policy themes in the plan) which is anomalous.

The Consultation Statement is an opportunity for the Town Council to tell the story of why the HNP has been produced and how it has engaged with the community in creating a plan which responds to local concerns. Consequently, the necessary redraft of the submission Consultation Statement should take the opportunity to explain cohesively how the HNP meets the regulatory requirements and is shaped by its own community.

SEA

50. The HNP is accompanied by a Sustainability Appraisal. Appendix A of the SA includes a Strategic Environmental Screening Determination (SEA) which concludes that the HNP would be unlikely to have any significant environmental effect and will not require a Strategic Environmental Assessment. Whilst some of the information within the Appendix is broadly helpful, there is no evidence of the detailed responses from the consultation bodies (Natural England, Historic England and the Environment Agency) in relation to the SEA Screening, instead the general comments of these bodies in relation to the HNP Scoping Report are incorporated into the final version of the Scoping Report where no clear reference is made to the SEA Screening. This is therefore unclear and it is uncertain as to whether the Regulations have been satisfied. Furthermore, NNDC remain to be satisfied that the SA objectives were appropriately selected and that the SEA Screening is sufficiently robust to support the plan. As previously noted, a view will need to be taken as to whether the SEA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.

It is recommended that the SEA Screening is undertaken in liaison with NNDC and that appropriate consultation is clearly undertaken and reported upon.

HRA

51. A HRA Screening Report has been prepared to accompany the HNP (August 2019) which concludes that there is likely to be no significant negative effects on the European Designated Sites arising from the HNP. Natural England agree with that outcome.

The report relies heavily on previous work undertaken in support of the NNDC Core Strategy and the Norfolk Strategic Framework. This work is somewhat dated and the HRA Report does not provide any more recent evidence of environmental assets and potential considerations, for example, the emerging Local Plan.

The HRA requires further update to reflect the passage of time and to ensure it is evidentially robust. Liaison with NNDC is recommended and a view will need to be taken as to whether the HRA information provided at Regulation 14 was sufficient to meet the legal requirements at that stage.

General

52. The main focus of this report has been on undertaking an assessment of the HNP, and in particular its policies, in its current draft form.

53. It is understood that there may be other matters that the TC may consider to be included within the HNP. If so, these should be considered and supported by evidence before their inclusion which may necessitate further public consultation before final submission to NNDC.

Andrew Seaman
Examiner

Appendix 3. Draft MoU.

Neighbourhood Planning

Memorandum of Understanding (MoU) between

Holt Town Council (HTC) and North Norfolk District Council (NNDC)

Date: xx May 2021

Introduction

MoUs are recognised as being a useful tool to aid the efficient production of a neighbourhood plan (NP). A MoU is designed to clarify the expectations and the working relationships between key parties involved in the preparation of a neighbourhood plan. This MoU is based on the template clauses recommended by Locality in its ‘toolkit for neighbourhood planners: Developing a Memorandum of Understanding’¹⁸.

Holt Neighbourhood Plan and North Norfolk District Council

Holt Town Council (HTC) is intending to update and submit its neighbourhood plan to NNDC as soon as practical.

This MoU aims to put working relationships on the best possible footing and is designed to be both a practical and aspirational document that sets out how to successfully complete the submission of the Holt NP and move to the referendum stage.

The clauses below represent the in-principle agreement on how the next stages of plan preparation can be effectively completed.

It does not attempt to influence the content of the NP but does recognise the value of a collaborative approach where the crucial support of NNDC to HTC can be delivered in a positive and timely fashion whilst, in return, the HTC can ensure it is engaging clearly and co-operatively with NNDC to the benefit of its community and a clear development plan.

Signatories

.....

On behalf of Holt Town Council

.....

On behalf of North Norfolk District Council

Xx May 2021

¹⁸ <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

Clauses

Section 1: Working Relationship

1.0 HTC and NNDC across all its departments seek an open and constructive relationship in relation to both strategic (such as the emerging Local Plan) and neighbourhood planning issues. This is expected to lead to regular and informed contact on matters of relevance to neighbourhood planning.

The parties to this memorandum seek:

- An open and constructive working relationship;
- To respect each others' views and, where these differ, after discussion ensure proper understanding of the reasons for such differences;
- To have a 'no surprises' policy, based on notifying each other well in advance, where possible, of significant announcements and developments in policy;
- To minimise duplication of activity wherever possible; and
- To inform other relevant stakeholders about our relationship so as to reduce uncertainty.

Section 2: NNDC 'Duty to advise and assist'

2.0 As a minimum NNDC will meet its statutory duty to HTC as defined by Paragraph 3 of Schedule 4B of the Town and Country Planning Act 1990. This will include, but is not limited to:

Preparation Phase (timely support to be provided to assist the delivery of the HTC Project Plan)

- Provision of details and electronic copies and reasonable explanation of existing and emerging local planning policy;
- Providing electronic copies of any existing relevant evidence base;
- Providing copies of Ordnance Survey maps to an appropriate scale;
- Providing advice on the regulations and legislation;
- Advising what needs to be produced in order to comply with EU obligations (under retained EU law);
- Ensuring appropriate Officer attendance at any workshops/meetings to brief the HTC on the local plan context, stage and direction;
- Providing a screening opinion in relation to the Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA) at the earliest opportunity after a full draft plan is developed and advise on a Scoping Report if required;
- Providing links to useful guidance, websites, published research studies, support bodies and networks;

- Advising on necessary consultees for SEA/HRA and other purposes; and
- Providing timely advice to ensure the draft plan or order complies with the Equality Act 2010.

Submission Phase

- Confirm that the draft plan meets the criteria in the Localism Act¹⁹ (following Regulation 15) – [X] weeks [insert number] following submission to NNDC;
- Publicise the submission plan and other relevant documentation (Regulation 16) – within [X] weeks of receiving the submission documents which meet the criteria and pass on representations to the Independent Examiner within [X] weeks of the close of the consultation period (Regulation 17);
- Identify up to three potential examiners and appoint one of these in agreement with the HTC:
- Undertake final checks of the plan for legal compliance;
- Submit the draft plan and supporting documents to the Independent Examiner (Regulation 17) – within [X] weeks of close of pre-submission publicity period;
- Consideration of the recommendations in the Examiners' Report, that the draft plan meets the basic conditions and publication of a 'Decision Statement' (Regulation 18/19) – [X] weeks following the receipt of the Examiner's report;
- Make arrangements, including the setting of a date for the holding of the referendum – within [X] days of the publication of the decision statement including naming a Project Officer for electoral services;
- Verify the selection of the electoral base with the HTC; and
- Making of the plan (Regulation 19/20) – at the first available meeting of cabinet/planning committee/council (delete as applicable) following a positive referendum vote.

2.1 The lead individual for the HTC will be (insert name and contact details). This person will endeavour to keep in regular contact with NNDC, this being not less than monthly. The lead officer for NNDC will be (name/details). Direct requests for information from NNDC/HTC shall be responded to within 10 working days.

2.2 Full meetings of the HTC in relation to HNP items will normally be open to the NNDC Lead Officer, and Local Councillors as de-facto members, notwithstanding the right of the Qualifying Body (QB) to sometimes meet without those parties being present;

2.3 NNDC will initiate and service an annual monitoring meeting with the QB to review progress in meeting the policies of the made neighbourhood plan and also respond to enquiries from the HTC within 10 working days in relation to progress.

¹⁹ The Localism Act inserts Schedule 4B into the Town and Country Planning Act 1990 (as amended) – see paragraphs 5 and 6.

2.4 In addition to the above NNDC will, subject to resources, provide practical assistance within 15 working days with regards to:

- The drafting of NP policies on request;
- Advice on the general conformity of policies within the neighbourhood plan with the strategic policies of the development plan;
- The signposting/provision of relevant evidence held or produced by NNDC; and
- Comments relating to any draft review of NP revised chapters/policies on reasonable and timely request in line with the HTC Project Plan - (see below)

Section 3 - HTC commitment to engage with its community

3.0 HTC undertakes, as always, to use a wide range of engagement and communications channels and techniques to listen to and hear from all sections of the community throughout the neighbourhood planning process.

3.1 HTC will produce a project plan with timescales which will form the basis of its consultation with its community and with NNDC.

3.2 “The HTC monthly meetings are held regularly. The Neighbourhood Plan shall be a frequent item on the agenda. The meetings are well-advertised and take Public questions, verbally, or in writing prior to the meeting, and are always open to the Community. The Finishing Group shall present a Neighbourhood Plan update, whenever on the agenda, and issue relevant articles as necessary throughout the year. NNDC have a full list of HTC meetings and can, therefore, plan forward so that they can attend when appropriate.”

General Provisions

Nothing in this memorandum shall fetter either party in exercising their statutory duties and powers. Nor does it prevent either party from exceeding the minimum level of service stated, either voluntarily or by the specific agreement of both parties.

Final MoU to be signed (as discussed and verbally agreed with HTC and NNDC)

Neighbourhood Planning

Memorandum of Understanding (MoU) between

Holt Town Council (HTC) and North Norfolk District Council (NNDC)

Date: 11th June 2021

Document control –

V1	Received discussed NNDC 19.5.21
V2 19.5.21	Updated with tracked changes and time lines – IW NNDC
V3 1/6/21	Amended with regard to HTC feedback -AS (IPe)
V4 2/6/21	Amended to reflect discussion with IW NNDC – AS (IPe) Discussed with HTC 10.6.21

Introduction

MoUs are recognised as being a useful tool to aid the efficient production of a neighbourhood plan (NP). A MoU is designed to clarify the expectations and the working relationships between key parties involved in the preparation of a neighbourhood plan. This MoU is based on some of the template clauses recommended by Locality in its ‘toolkit for neighbourhood planners: Developing a Memorandum of Understanding’²⁰.

Holt Neighbourhood Plan and North Norfolk District Council

Holt Town Council (HTC) is intending to update and submit its neighbourhood plan to NNDC as soon as practical.

This MoU aims to put working relationships on the best possible footing and is designed to be both a practical and aspirational document that sets out how to successfully complete the submission of the Holt NP and move to the referendum stage.

The clauses below represent the in-principle agreement on how the next stages of plan preparation can be effectively completed.

It does not attempt to influence the content of the NP but does recognise the value of a collaborative approach where the crucial support of NNDC to HTC can be delivered in a positive and timely fashion whilst, in return, the HTC can ensure it is engaging clearly and co-operatively with NNDC to the benefit of its community and a clear development plan.

Signatories

.....

²⁰ <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

On behalf of Holt Town Council

.....

On behalf of North Norfolk District Council

11th June 2021

Clauses

Section 1: Working Relationship

1.0 HTC and NNDC across all its departments seek an open and constructive relationship in relation to both strategic (such as the emerging Local Plan) and neighbourhood planning issues. This is expected to lead to regular and informed contact on matters of relevance to neighbourhood planning.

The parties to this memorandum seek:

- An open and constructive working relationship;
- To respect each others' views and, where these differ, after discussion ensure proper understanding of the reasons for such differences;
- To have a 'no surprises' policy, based on notifying each other well in advance, where possible, of significant announcements and developments in policy;
- To minimise duplication of activity wherever possible; and
- To inform other relevant stakeholders about our relationship so as to reduce uncertainty.

Section 2: NNDC 'Duty to advise and assist'

2.0 As a minimum NNDC will meet its statutory duty to HTC as defined by Paragraph 3 of Schedule 4B of the Town and Country Planning Act 1990. This will include, but is not limited to:

Preparation Phase (timely support to be provided to assist the delivery of the HTC Project Plan)

- Provision of details and electronic copies and reasonable explanation of existing and emerging local planning policy;
- Providing electronic copies of any existing relevant evidence base;
- Providing copies of Ordnance Survey maps to an appropriate scale;
- Providing advice on the regulations and legislation;

- Advising what needs to be produced in order to comply with EU obligations (under retained EU law);
- Ensuring appropriate Officer attendance at any workshops/meetings to brief the HTC on the local plan context, stage and direction;
- Providing a screening opinion in relation to the Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA) at the earliest opportunity after a full draft plan is developed and advise on a Scoping Report if required;
- Providing links to useful guidance, websites, published research studies, support bodies and networks;
- Advising on necessary consultees for SEA/HRA and other purposes, including undertaking the necessary consultation on the screening opinions.

Submission Phase

- Confirm that the draft plan meets the criteria in the Localism Act²¹ (following Regulation 15) and has regard to the submission validation requirements contained in the published NNDC neighbourhood planning submission check sheet – usually 2 weeks following submission to NNDC; (no assessment is made on whether the Draft Plan meets the Basic Conditions).
- As soon as reasonably possible after receiving the validated submission documents and examination material NNDC will publicise the Draft Plan in accordance with the regulations, appoint an Examiner and provide the appropriate supporting documentation. The timing of the appointment is a matter of judgment for the Council. The aim is to ensure that the chosen examiner has sufficient availability to commence the examination in the coming weeks after the minimum 6-week period for representations has closed.
- The appointment will be preceded by a process to identify an appropriately qualified and independent examiner, such as by seeking ‘expressions of interest’ (EoI) including the involvement of HTC. The process will take approximately 6-7 weeks including a 4 week response time for EoI.
- Consideration of the recommendations in the Examiners’ Report, that the draft plan meets the basic conditions and publication of a ‘Decision Statement’ (Regulation 18/19) The Decision Document must be published

²¹ The Localism Act inserts Schedule 4B into the Town and Country Planning Act 1990 (as amended) – see paragraphs 5 and 6.

within 5 weeks following receipt of the Examiners final report, or at an alternate time agreed with the QB (note this is in line with the regulations).

- Make arrangements, including the setting of a date for the holding of the referendum. NNDC will aim to hold the referendum in line with the regulatory requirements within 56 working days following issue of the Decision Document, or at an alternate time agreed with the QB.
- Verify the selection of the electoral base with the HTC; and
- Making of the plan (Regulation 19/20) – at the first available meeting of cabinet-following a positive referendum vote.

2.1 The lead individual for the HTC will be (Gemma Harrison/Clerk). This person will endeavour to keep in regular contact with NNDC, this being not less than monthly. The lead officer for NNDC will be (Iain Withington, planning policy Team leader). Direct requests for information from NNDC/HTC shall be responded to within 10 working days.

2.2 Full meetings of the HTC in relation to HNP items will normally be open to the NNDC Lead Officer, and Local Councillors as de-facto members, notwithstanding the right of the Qualifying Body (QB) to sometimes meet without those parties being present.

2.3 In addition to the above NNDC will, subject to resources, provide practical assistance within 15 working days with regards to:

- The drafting of NP policies on request;
- Advice on the general conformity of policies within the neighbourhood plan with the strategic policies of the development plan;
- The signposting/provision of relevant evidence and guidance held or produced by NNDC; and
- Comments relating to any draft review of NP revised chapters/policies on reasonable and timely request in line with the HTC Project Plan – subject to internal work priorities and staff resource (see below)
- It is acknowledged that the TC reserve the right to progress the content of the plan in any event.

Section 3 - HTC commitment to engage with its community

3.0 HTC undertakes, as always, to use a wide range of engagement and communications channels and techniques to listen to and hear from all sections of the community throughout the neighbourhood planning process.

3.1 HTC will produce an ongoing and updated project plan for the production of the NP, with timescales, which will form the basis of its consultation with its community and with NNDC.

3.2 “The HTC monthly meetings are held regularly. The Neighbourhood Plan shall be a frequent item on the agenda. The meetings are well-advertised and take Public questions, verbally, or in writing prior to the meeting, and are always open to the Community. The Finishing Group shall present a Neighbourhood Plan update, whenever on the agenda, and

issue relevant articles as necessary throughout the year. NNDC have a full list of HTC meetings and can, therefore, plan forward so that they can attend when appropriate.”

General Provisions

4.0 Nothing in this memorandum shall fetter either party in exercising their statutory duties and powers. Nor does it prevent either party from exceeding the minimum level of service stated, either voluntarily or by the specific agreement of both parties.

Appendix 4. Holt NP Project Plan/Road Map to Submission

Note:

To update the HNP to a point where it may be submitted and accepted by NNDC, the TC Finishing Group agree with the principle of a project plan to guide the additional work required. Additional guidance on project planning is available from Locality²². Ownership of this Project Plan rests with the TC.

Whilst this is a flexible plan, it sets out three key stages to be undertaken each with key tasks (other tasks will be required). Firstly, having agreed a Memorandum of Understanding with NNDC, a review of the existing HNP, its evidence and policies to include consideration of the scope for the addition of additional matters/issues and mindful of the Facilitation Report Health Check. Secondly, an update of the HNP, its policies and supporting documents. Finally, the submission of the HNP and its associated documents to NNDC. The target submission date will be dependent on the preferred changes to the HNP.

The Project Plan will be maintained by Holt TC and V1 is available here (appropriate ProjectLibre software required).

Project
Libre

Holt NP PP.pod

Review

Update

Submit



May 2021

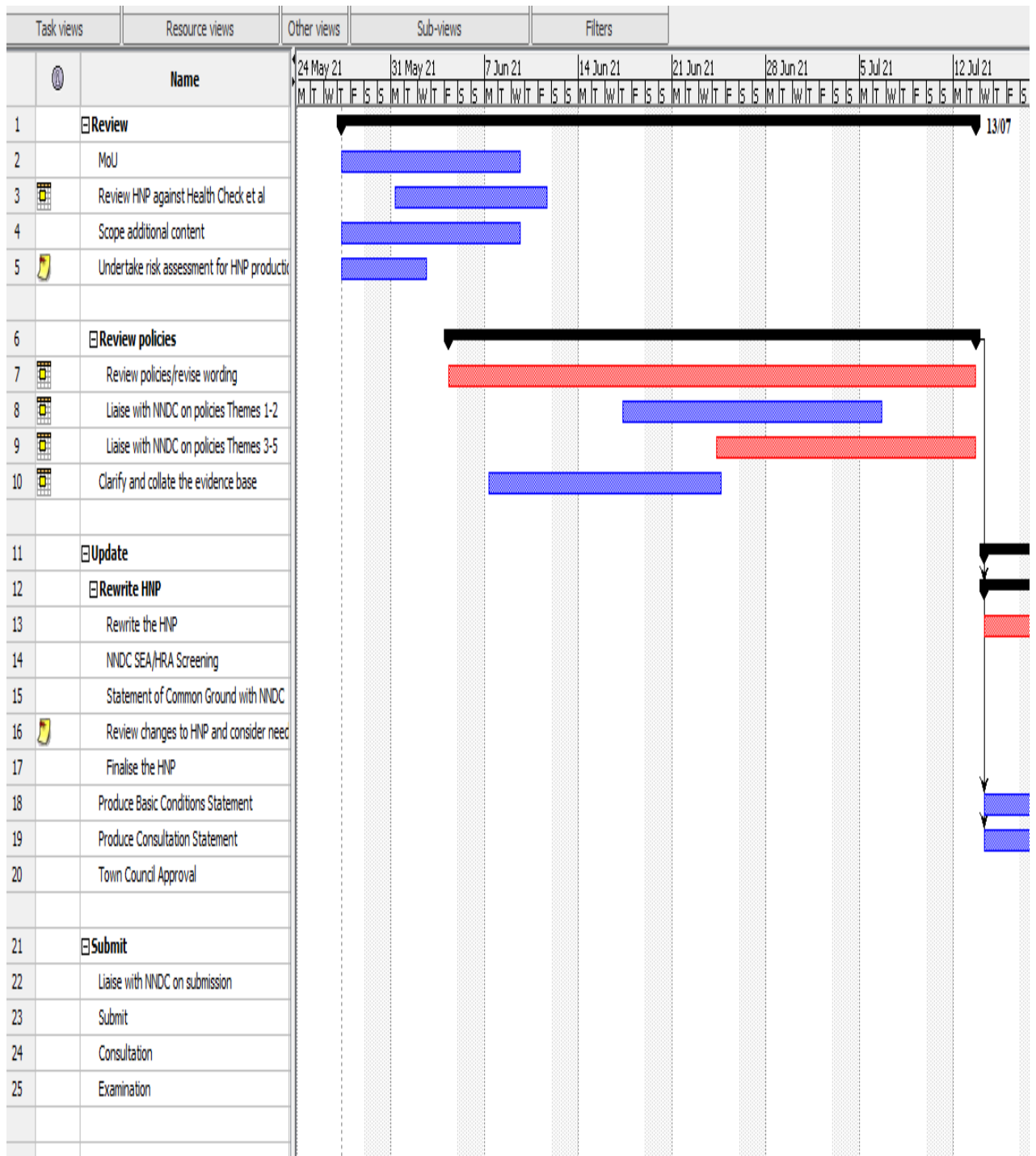
November 2021

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²² <https://neighbourhoodplanning.org/toolkits-and-guidance/project-planning-tool/>

A partial snap-shot of the project plan overview is below:



Stages:

A: Review Tasks

Agree Memorandum of Understanding with NNDC

Purpose: to ensure clear and timely collaboration/communication with NNDC and vice versa

Responsible person/group:

Task:

- To complete an agreed MoU

Output:

- An agreed MoU.

Time frame:

- 10 days

Useful References:

- Draft MoU
- <https://neighbourhoodplanning.org/toolkits-and-guidance/developing-memorandum-understanding/>

Review current HNP against Health Check Facilitation Report and current circumstances

Purpose: to identify the specific parts of the current HNP that require updating.

Responsible person/group:

Task:

- read the HNP against the HC report;
- By chapter, identify areas within the HNP that require updating and alteration.

Output:

- A written note detailing pages, paragraphs, maps, figures and general content that require alteration.

Time frame:

- 10 days

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

Scope Additional Matters for Inclusion

Purpose: to identify which additional matters/issues could be included within the HNP

Responsible person/group:

Task:

- To identify if any additional matters/issues should be included within the HNP; if so, to identify which ones;
- To assess whether the additional matters/issues can be practically achieved in a reasonable time frame and with available resources (personnel, expertise, funding) including community engagement where necessary.

Output:

- A summary report/note of how the scoping was undertaken, what it included and what actions are recommended.

Time Frame:

- 10 days

Useful References:

- [North Norfolk District Council - policy](#)

Review and Update Policies

Purpose: to review and update each existing policy of the HNP and ensure it meets the requirements for a justified and effective planning policy and had due regard to national policy and is not contrary to the strategic policies of the development plan.

Responsible person/group:

Task:

- To update, where necessary, each policy of the HNP
- To ensure each policy is supported by appropriate evidence.
- To update the supporting text of each policy chapter to ensure it cogently explains the rationale for the policies which follow.
- Coordinated liaison with NNDC to discuss policy amendments (by chapter) and their relationship with the emerging/extant Local Plan

Output:

- A written document containing necessary policy amendments and supporting text updates.
- One document per Policy Chapter/Theme.

Time Frame:

- 28 days

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

Review the existing Evidence base (and compile evidence list)

Purpose: to demonstrate that the HNP (to date) has been based on sufficient and adequate evidence.

Responsible person/group:

Task:

- to compile a list of all relevant evidence sources used in the compilation of the HNP to date.

Output:

- A list of evidence, with links to where each can be found (this can be included into the Basic Conditions Statement in due course).

Time Frame:

- 14 days

References:

- [NPPF](#)
- [North Norfolk District Council – policy](#)
- [Holt Town Council NP website](#)

MILESTONE:

Complete the review stage.

TC to consider the outcomes and the extent of further updates to the HNP necessitated. This will enable determination of the next steps, including the need for any additional evidence to support the plan and any additional consultation/engagement with stakeholders. Liaison with NNDC at this point recommended leading to the production of a draft Statement of Common Ground.

B: Update Tasks

Amend/Rewrite the HNP.

Purpose: to produce a pre-submission version of the HNP that is up to date, meets the Basic Conditions and is clear/justified/effective.

Responsible person/group:

Task:

- To update the HNP to reflect the passage of time since 2019.
- To include necessary amendments to policies, supporting text and evidence;
- To incorporate new matters/issues where appropriate but only where supported by suitable evidence and allowing for community engagement;
- To assess whether the additional matters/issues can be practically included in a reasonable time frame and with available resources (personnel, expertise, funding).

Output:

- A fully revised draft of the HNP. Two versions should be drafted:
 - i) a track changed version if possible to enable ease of comparison between the previous HNP and its successor;
 - ii) a 'clean' new version.

Note:

- The extent of the changes to the previous version of the HNP will need to be assessed for a necessity to engage in further consultation with the community and stakeholders.
- The revised HNP can be submitted to NNDC for SEA/HRA Screening. The outcomes of the Screening will need to be assessed for their implications on the need for further updates to the HNP.

Time Frame:

- 42 days after receipt of preceding Review Stage

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – How to create a NP \(roadmap\)](#)
- [Locality – How to write planning policies](#)
- [Locality – various toolkits and advice](#)

Basic Conditions Statement

Purpose: to complete a Basic Conditions Statement which adequately demonstrates how the HNP has been produced to meet the applicable Basic Conditions for a NP.

Responsible person/group:

Task:

- To finalise a Basic Conditions Statement which clearly shows how the revised HNP, allowing for the passage of time and addressing the hiatus since 2019, meets the Basic Conditions applicable to any NP.

Output:

- A Basic Conditions Statement.

Time Frame:

- 42 days after receipt of preceding Review Stage

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – General conformity with strategic local planning policy](#)

Consultation Statement

Purpose: to complete a Consultation Statement which adequately demonstrates how the HNP has been produced to satisfy the requirements applicable to community engagement in the production of a NP.

Responsible person/group:

Task:

- To finalise a Consultation Statement which clearly shows how the revised HNP, allowing for the passage of time and addressing the hiatus since 2019, meets the consultation requirements applicable to any NP.

Output:

- A Consultation Statement.

Time Frame:

- 42 days after receipt of preceding Review Stage

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)
- [Locality – Engaging with your community](#)
- [Locality – consult with environment statutory consultees](#)

MILESTONE:

The Update Stage will be completed following the production of the above documents.

Note: The revised draft plan should be submitted to NNDC for SEA/HRA Screening asap. Upon substantive completion of the draft, a copy should be sent to NNDC and a draft Statement of Common Ground prepared to support the submission version.

The TC must consider the scope and scale of changes to the HNP and implications for consultation. Substantive material changes to the HNP will require further Regulation 14 consultation before formal submission to NNDC.

C: Submission Task

Submit to NNDC

Purpose: to meet Regulation 15 of the Neighbourhood Planning Regulations (2012) and to enable the HNP to proceed for Examination.

Responsible person/group:

Task:

- To finalise the HNP, the Basic Conditions Statement and the Consultation Statement and submit to NNDC.

Output:

- A successful submission accepted by NNDC.

Time Frame:

- As soon as practical following Town Council resolution (as necessary) for the submission of the HNP documents.

Useful References:

- Facilitation Report with Health Check
- [National Planning Policy Framework](#)
- [Planning Practice Guidance](#)
- [North Norfolk District Council - policy](#)

MILESTONE successful submission date