

Examination Library Document Reference - A11

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a ‘mock’ examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 ‘key questions’ in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the ‘tests’ as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#) and other statements of national planning policy, where relevant.

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

| | KEY QUESTIONS | <p align="center">Assessment</p> <p align="center"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> |
|------------------------|---|---|
| Growth Strategy | | |
| A | <p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p> | <p>The Spatial Strategy sets out the distribution of development and provides the framework to deliver growth that is necessary to meet the District’s existing and future needs for all types of development. The Strategy sets out the foundation to achieve the Plan’s Aims and Objectives, incorporates site allocations for new homes, employment and other needs, for identified large and small towns and large villages and provides an indicative housing growth allowance for identified small villages. Alongside the Settlement Hierarchy, the Plan makes allowances for a significant proportion of windfall development and for limited development in the remaining settlements and countryside in line with exceptions policies.</p> |
| B | <p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p> | <p>The Plan proposes a sustainable distribution of development taking account of all three strands of sustainability: economic, social and environmental. Location of growth is directly informed by a detailed assessment of development need and capacity of places to accommodate development and the associated impacts as evidenced in Background Paper 2 Distribution of Growth (updated) (May 2023) Examination Library [EL C2]. The Plan’s key principle centres on climate resilient sustainable growth, where new development requires the concentration of the majority of growth in those settlements that already have a range of services and employment opportunities in order to reduce the need to travel, namely the three identified Large Growth Towns and five Small Growth Towns. As a predominantly rural district, this approach is also significantly influenced by the need to protect the rich natural environment within the district, and the need to take account of flood risk and coastal erosion, alongside infrastructure constraints.</p> |
| C | <p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p> | <p>The main growth areas relate to the site allocations for the Large and Small Growth Towns as follows:</p> <ul style="list-style-type: none"> • Cromer – three largely residential sites (C07/2, C16 and C22/2) with off-site water supply reinforcement, foul sewerage network enhancement and localised highway improvements likely to be required. • Fakenham - four largely residential sites (F01/B, F02, F03, F10) with off-site water supply reinforcement, foul sewerage network enhancement and localised highway improvements likely to be required. • North Walsham – two mixed use sites and one employment site (NW01/B, NW62/A, NW52) with significant investment in supporting infrastructure likely to be needed, including a new primary school, a new western link road and off-site highway improvements, off-site water supply reinforcement, foul sewerage network enhancement and given the scale of growth envisaged in the town, requisite mitigation to health care provision. The approach will be supported by a development brief. |

| | KEY QUESTIONS | Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
|--|--|---|--|--|---|---|
| | | <ul style="list-style-type: none"> Holt – two residential sites and one employment site (H17, H20, H27/1) with off-site water supply reinforcement, foul sewerage network enhancement likely to be required, alongside a replacement primary school and mitigation to health care provision within the area. Hoveton – one residential site (HV01/B), which requires a water catchment strategy including appropriate foul water drainage mitigation measures and localised highway improvements. Sheringham – three residential sites (SH04, SH07, SH18/1B) with some off-site water supply reinforcement and foul sewerage network enhancement likely to be required. Stalham – one residential site and one mixed use site (ST19/A, ST23/2) with some off-site water supply reinforcement, foul sewerage network enhancement and localised highway improvements likely to be required. Wells-next-the-Sea – two residential sites (W01/1, W07/1) with some off-site water supply reinforcement, foul sewerage network enhancement and localised highway improvements likely to be required. | | | | |
| 1. | Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the four soundness tests can be demonstrated with regard to sustainable development : | | | | |
| | | <ul style="list-style-type: none"> The spatial strategy for sustainable growth, as set out in Policy SS1, in particular through the settlement hierarchy, and through the twenty-eight site allocations policies within the Plan. These policies are supported by evidence contained with a number of Background Papers, but mainly Distribution of Growth Background Paper 2 (updated) (May 2023) [EL C2] and the Site Assessment Booklets [EL D1- D12]. All of the topic based strategic policies provide further requirements on how climate resilient sustainable development will be delivered. All policies and allocated sites have been assessed against reasonable alternatives and further informed by the Sustainability Appraisal Report (January 2022) [EL A3], which considers how each would achieve sustainable development, site allocations have been tested for availability, suitability and deliverability. | | | | |
| | | Implications of taking no further action: N/A | | | | |
| Mitigation / Action required (if necessary) to move scale to right: N/A | | | | | | |
| Reviewer Comments: | | | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 2. | <p>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, the amount of development identified for growth areas is evidenced as follows,</p> <ul style="list-style-type: none"> Background Paper 2, Distribution of Growth (updated) (May 2023) [EL C2] clearly sets out the evidence as to how the Council has arrived at the proposed settlement hierarchy in the context of sustainable development. This is also complemented by other supporting Background Papers, such as Paper 6, Development Site Selection Methodology (updated)(January 2022) [EL C6], which evaluates the availability and deliverability as part of the site selection process. | | | | |
| | | Implications of taking no further action: N/A | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: N/A | | | | |
| Reviewer Comments: | | | | | | |
| 3. | <p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, the Council’s approach to setting the level of housing growth has been robustly evidenced:</p> <ul style="list-style-type: none"> The SHMA, Local Housing Needs Assessments (2017 & 2019) [EL E1 & E2] and Background Paper 1 Approach to Setting the Housing Requirement (updated)(May 2023) [EL C1] provides the evidence and justification for the District’s methodology to inform the local housing need requirement. It sets out in full detail the reasoning for using the 2016 based National Household Projections as the starting point for the standard methodology calculation. The authority has considered a range of higher and lower options but these are not supported by the evidence. A lower figure would fail to address identified needs and in particular would not address the need for affordable homes. Higher targets are equally not justified by the evidence and would raise concerns about capacity to deliver and the sustainability of the resulting levels of growth. | | | | |
| | | Implications of taking no further action: N/A | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: N/A | | | | |
| Reviewer Comments: | | | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | <ul style="list-style-type: none"> By applying the affordability uplift aspects of the standard requirement the resulting figure is already 37% up above demographic growth requirements and this alone justifies the approach not to include further upward revisions. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 4. | Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: N/A – There is no designated Green Belt in North Norfolk | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 5. | Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the sites selected have been clearly informed by; | | | | |
| | | <ul style="list-style-type: none"> The Housing and Economic Land Availability Assessment (HELAA 2018) [EL H1] sets out the potential housing and employment land supply. Background Paper 6 Site Selection Methodology (updated)(January 2022) [EL C6.1] sets out the methodology as to how all residential and employment sites were identified. The Site Appraisal Methodology incorporates at Stage 2a, the assessment of each site against measurable site assessment criteria based on the SA Objectives and SA Framework. The Sustainability Appraisal Report [EL A3] for the Plan appraises the site allocations against a framework for the delivery of sustainable development. Along with the Interim Local Plan Viability Assessment Report | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | | <p>(October 2018) [EL I11.1] and Local Plan Viability Assessment (September 2022), [EL I11] the matters on all of these documents have been used to inform the policies and site allocations.</p> <ul style="list-style-type: none"> The Site Assessment Booklets [D1 – D12] for each of the large and small growth towns and large growth villages provide a full assessment and justification for all of the selected sites and alternatives. | | | | |
| | | Implications of taking no further action; | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 6. | Does the local plan policies update identify a housing requirement for designated neighbourhood areas? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, Policy SS1 sets out the settlement hierarchy, which is supported by Table 2 that provides a combined Indicative Housing Allowance for Small Growth Villages, which is the lowest tier of the hierarchy. Policy HOU1 provides housing requirements for the upper three tiers of the settlement hierarchy. Policy SS3 sets out a positive approach to Community led development. The scale of growth appropriate in each tier of the Settlement Hierarchy is clear. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 7. | Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Each site allocation identified within the Plan includes a full description of the site and details of the site’s constraints, infrastructure, including where specific provision and/or enhancement will be required, as well as, information regarding deliverability. The District’s HELAA (2018) [EL H1] identifies an indicative quantum for each site to inform the more detailed site assessment stages. The Plan is accompanied by an iterative Infrastructure | | | | |
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| | | Assessment | | | | |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Delivery Plan Background Paper 4 November 2022 (updated May 2023) [EL C4], which updated the previous Infrastructure Position Statement published at Regulation 18 stage (May 2019) [EL C4.1]. The North Walsham West (NW62/A), as the largest allocation, also has supporting work in the form of a Feasibility Study for the link road (2020/ 2021) [EL D19, D20, D21] and its delivery is included as a requirement in the supporting North Walsham Sustainable Urban Extension Development Brief (weblink -May 2021) [EL D18] . | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| D | <p>What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period?</p> <p>List these targets and the evidence source for this 'need' target?</p> | <p>Policies E1 – E4, in particular, set out the strategy for economic growth in the District, including details regarding existing and new employment areas and projected retail floorspace.</p> <p>The Council in the proposed submission version of the local Plan is proposing to designate a total of 272.07 hectares of employment land inclusive of the 200.58 hectares which are already developed for employment purposes. This will increase the supply of undeveloped employment land in the District to 71.49 hectares and provide an increased supply in each area of the District in order to provide for choice and flexibility and to help meet the identified development and future needs.</p> <p>The economic policies are supported by a number of documents, including a Growth Sites Delivery Strategy (August 2021) [EL H6], which provides an assessment of the supply and demand for employment land in the District, as well as, assessing employment land not superseded by the Plan and allocated employment sites made through the Plan. The commissioned study provides analyses of a number of approaches and recommends an approach based on past take up rates for the emerging Local Plan. The findings of the study and policy approaches are built upon and informed through further review set out in detail in the supporting Background Paper 3 Approach to Employment (updated) [EL C3].</p> <p>The North Norfolk Retail & Main Town Centres Uses Study (March 2017) [EL H3] undertook a qualitative and quantitative assessment of the Districts Town centres and established the base line position with regards expenditure growth available to support new retail floor space across the district.</p> | | | | |
| 8. | Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |

| | KEY QUESTIONS | <p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> |
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| | <p>achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</p> | <p>Reason for score: The Annual Monitoring Report (AMR) will monitor the effectiveness of Policies E1-E4 in terms of economic growth</p> <p>Three specific site allocations for employment uses (H27/1, NW52, E7) have been designated in the Plan. The new allocations collectively provide 17.43 hectares of employment land.</p> <p>The District has a well-established retail hierarchy. The towns are geographically spread across the District and well placed to meet the shopping needs of a significant proportion of the population and visitors. The 2017 Retail Study [EL H3] reviewed expenditure growth expected across the District including anticipated tourist spending in order to establish the capacity to support retail floorspace growth. The quantitative and qualitative assessment suggests that there is limited scope for new convenience and comparison goods development. It also identified that there is generally good provision of food and beverage outlets such as restaurants/cafes, and pubs within the main tourist destinations, having a particular strong offer.</p> <p>The Plan seeks a criteria-based approach (Policy E4) to ensure that new retail proposals are located in sustainable and suitable locations and meet the evidenced retail needs for the District in line with national sequential approach and local requirements. Primarily, the Council will seek to ensure that retail development is located within central, accessible locations within the District which can be accessed sustainably and with regard to the retail hierarchy and functional relationships between places. Only where it has been demonstrated that this cannot be achieved, or is not appropriate, should alternative locations be considered. The 2017 Retail Study identified that much of the projected growth could be accommodate through the uptake of vacant units and through the development/ redevelopment of existing town centre sites and through thew broad range of permitted development rights that now exist s in relation to town centres. A review of the Town Centre boundaries and Primary Shopping Areas (PSAs) has also been undertaken, informed by the 2017 Retail Study in order to identify suitable sites and manage the town centres. The PSA is the area where the sequential approach indicates that Use Classes A1-A5 should be focussed and also provides the boundary to establish the extent of edge of centre locations in relation to retail. For all other main town centre uses, the town centre boundary is used. The proposed boundaries are shown on the Policies Map (weblink) [EL A1].</p> |
| | | <p>Implications of taking no further action:</p> |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> |
| | | <p>Reviewer Comments:</p> |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | | | | | |
| 9. | Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Each site allocation for the top three tiers of the Settlement Hierarchy contains details of infrastructure requirements necessary to support development. This is supported by Background Paper 4 Infrastructure Delivery Plan November 2022 (updated May 2023) [EL C4], which includes an Infrastructure Delivery Schedule, a live document that seeks to provide the most accurate picture of current infrastructure requirements and anticipated costs for each proposed allocation and other policy areas that require specific infrastructure provision.</p> <p>Each policy in the Plan, particularly the site-specific policies, identify infrastructure requirements that must be provided for to ensure any future application's conformity to the policy. The Infrastructure Delivery Schedule highlights how the Council expects the requirements to be delivered, either through site developer or Council provision, as set out in the Norfolk Strategic Infrastructure Delivery Plan (December 2022) [EL I3] and how these will be funded, mostly by developer contributions.</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 10. | Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, Policy HC4 – funded through S106 developer contributions, and third party investment. As above, this information is set out in Background Paper 4 Infrastructure Delivery Plan November 2022 (updated May 2023) [EL C4]. Together with the Norfolk Strategic Infrastructure Delivery Plan (December 2022) [EL I3] and the agreements set out in the Norfolk Strategic Planning Framework (May 2021) [EL A8.1], a Plan wide viability assessment has been undertaken of specific typologies and allocations which demonstrates that the Plan policies can</p> | | | | |

| | KEY QUESTIONS | <p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> |
|---|--|--|
| | <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p> | <p>be delivered with the proposed sites being viable and deliverable – Local Plan Viability Assessment (September 2022) [EL I11].</p> <p>The Infrastructure Delivery Schedule (IDS) contained in the Council’s Infrastructure Delivery Plan (IDP), Background Paper 4, November 2022, (updated May 2023) [EL C4], highlights how the Council expects site-specific infrastructure requirements to be delivered, whether these requirements will be provided through developer or Council led development, and how they will be funded which is mostly through developer contributions. The IDS also identifies ongoing infrastructure projects such as the improvements to the A148/A1065 which is being funded jointly through developer contributions and by the Council, and will help enable further development in the area. In addition, the Council’s IDP and IDS should be considered alongside Norfolk County Council’s own strategic IDP which details larger scale transport infrastructure projects.</p> <p>Funding gaps have not been identified, however, all infrastructure projects proposed in the IDS are tied into site-specific policies where developers are expected to deliver these requirements. Additionally, the Council are utilising Statements of Common Ground to ensure there is agreement between the Council and the Site owners/promoters in the principle of their allocation and delivering the site-specific policy requirements.</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</p> |
| <p>Process and Outcomes (see also Toolkit Parts 2 and 3)</p> | | |
| <p>E</p> | <p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p> | <p>The Council has worked collaboratively since 2015 on a range of key strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF, May 2021) [EL A8.1], which sets out approximately thirty Formal Agreements within a Statement of Common Ground. The document groups the strategic issues regarding:</p> <ul style="list-style-type: none"> • Economic issues, including specific reference to the Norfolk Coast; • Housing issues, including capacity and distribution, delivering housing growth and types of homes, such as specialist types of accommodation, elderly people; • Health, including the Health Infrastructure Protocol and design through healthy living and well-being. |

| | | Assessment | | | | |
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| KEY QUESTIONS | | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | | <ul style="list-style-type: none"> • Climate Change, including the reduction of greenhouse gas emissions and promoting the use of renewable and low carbon energy sources. • Infrastructure and environment issues, see below in relation to GIRAMS. <p>Other cross-boundary strategic matters include:</p> <ul style="list-style-type: none"> • Delivery of mitigation at European Sites caused by alone and in combination effects through the Norfolk Wide Green Infrastructure and Recreational impact avoidance strategy (GIRAMS) (March 2021) [EL G9], joint preparation with Norfolk authorities and Natural England; • Nutrient Neutrality – preparation of a Joint Venture with other Norfolk Authorities; • Coastal Management – Coastal Partnership East managing the coast across a number of Norfolk and Suffolk Local Planning Authority areas, including a Statement of Common Ground: Coastal Zone Planning (2018) [EL G4]. | | | | |
| 11. | <p>DStatement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, the Duty to Co-operate (May 2023) [EL A8] Statements of Common Ground;</p> | | | | |
| | | <ul style="list-style-type: none"> • identify the issues as set out above; • the bodies that the Council has engaged with/continue to engage with; | | | | |
| | | <p>Additional individual Statements of Common Ground are being prepared, where necessary, and will include areas of agreement and disagreement.</p> | | | | |
| | | <p>Implications of taking no further action:</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> | | | | |
| | | <p>Reviewer Comments:</p> | | | | |

| KEY QUESTIONS | | Assessment | | | | |
|----------------------|---|---|--|--|---|---|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| F | <p>Are there any aspects of the local plan policies update not in conformity with national policy (or where you will be relying on transitional provisions)? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p> | <ul style="list-style-type: none"> The Plan does not derive the housing requirement by using the required 2014 National Household Projections as part of the standard methodology calculation, but instead uses the 2016 National Household Projections to calculate the standard methodology. The SHMA Local Housing Needs Assessment (November 2019) [EL E1] sets out the justification for this in full detail. The Council is satisfied with the robustness of the evidence to justify the departure from the 2014 figures required by the NPPF. The Plan includes requirements for affordable housing provision on sites that fall below the threshold of major developments, being for schemes of 6 or more dwellings in Designated Rural Areas. To address the possible practical problems of providing affordable housing on small sites the policy also includes the option of making an equivalent financial contribution in order to deliver affordable housing elsewhere. The Plan seeks progressive and increased carbon reduction from development in order to achieve the road to zero aims and objectives and support the national transition. | | | | |
| 12. | <p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: No. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 13. | <p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any ‘higher level’ plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Plan has been positively prepared in alignment with the North Norfolk Corporate Plan, 2019-2023 (November 2019) [EL C13] and reflects provisions made within the adopted Neighbourhood Plans. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |

| KEY QUESTIONS | | Assessment | | | | |
|---------------------------|---|--|--|--|---|---|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 14. | Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the updated version of the Consultation Statement (May 2023) [EL A5] summarises how the Council has undertaken engagement in accordance with Paragraph 22 (1) of the 2012 regulations, as follows: <ul style="list-style-type: none"> • Which bodies and persons the Council invited to make representations under Regulation 18 (1); • How these bodies and persons were invited to make representations under Regulation 18; • A summary of the main issues raised by the representations made pursuant to Regulation 18; and, • How any representations made pursuant to regulation 18 have been taken into account. The statement includes Appendices that provide officer responses to a summary of the representations made against each policy and site allocation. | | | | |
| | | The consultation has been delivered in accordance with the Council’s Statement of Community Involvement (SCI) (January 2016) [EL A9], which sets out how the Council should undertake consultations on Local Plan documents. The Council is satisfied that the SCI remains up-to-date. At each of the consultation stages the Councils Planning Policy & Built Heritage Working Party has reviewed and signed off the communication strategy. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| Reviewer Comments: | | | | | | |
| 15. | Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the Sustainability Appraisal Report (January 2022) [EL A3] sets out a clear framework for the assessment of the Local Plan and the delivery of sustainable development. It assesses the policies, and the site allocations of the Plan against reasonable alternative options. The appraisal gives a written summary of each policy and site allocation and explains why the alternatives were not preferred. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Reviewer Comments: | | | | |
| 16. | Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, the Sustainability Appraisal Report (January 2022) [EL A3] assesses both the policies and proposals by testing them against a Sustainability Appraisal Framework, which is made up of a series of 16 Sustainability Objectives that are based on the key issues in the Interim SA Scoping Report. The predictions are evaluated individually and cumulatively in order to fully assess the impacts of the policies and proposals. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 17. | Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Sustainability Appraisal has influenced and refined changes to the policies and site allocations from the former Interim Sustainability Appraisal Report (May 2019) [EL B7] through to the Sustainability Appraisal Report (January 2022) [EL A3]. The latter document demonstrates increased positive effects across the majority of SA Indicators. In particular, many of the policies have been strengthened within the Climate Change and Environment sections of the Plan. How the SA informed site appraisals can be seen from the separate Sites Assessment Booklets [EL D1 – D12], which contain a detailed assessment of all the alternatives considered and the parameters around selection. Overall, the Plan is predicted to have a significant positive effect on the social, environmental and economic aspects of sustainability. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| KEY QUESTIONS | | <p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
|--|--|--|--|--|---|---|
| 18. | <p>Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?</p> | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, an Equalities Impact Assessment (EqIA) was undertaken and published at the first stage of the Local Plan preparation (the Regulation 18 Notification February 2016) [EL B16]. The evidence did not indicate that the broad themes proposed to be included in the Local Plan Regulation 18 notification document would adversely affect any of the equality groups identified in legislation. The results of this EqIA influenced consultation methods to ensure that they were accessible to all audiences and that the timings of consultations would be inclusive. All stages of the local Plan preparation have been undertaken in accordance with the Council’s Statement of Community Involvement (January 2016) [EL A9]. The Local Plan’s accompanying Consultation Statement (May 2023) [EL A5] sets out how the Council has involved the community and various bodies in the preparation of the Local Plan. A further EqIA (July 2022) [EL A7] reviews the Council’s Regulation 19 stage of local plan preparation and, tests the Plan against the protected characteristics set out in the Equalities Act 2010. The results of which, conclude that the Plan will have either a positive or neutral impact on the different protected characteristics. No identified adverse impacts have been identified. Therefore, it is not necessary to revise or remove any of the Local Plan policies. The identified benefits will also have benefits for the wider community. There are some policies that target certain groups, the justification for these approaches can be found within the Council’s evidence base and the framework provided by Government guidance.</p> | | | | |
| | | <p>Implications of taking no further action:</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> | | | | |
| | | <p>Reviewer Comments:</p> | | | | |
| 19. | <p>Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| <p>Reason for score: Yes, the emerging Plan has been through various iterations and each has been accompanied by the appropriate stage Habitats Regulation Assessment (HRA). The step-by-step process is summarised in Figure 1, page 9 of the final HRA (December 2021) [EL A4]. The HRA follows principles of case law, both UK and EU, and follows</p> | | | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | <p>appropriate Government guidance. The need to consider possible in-combination effects arises in stage 1 screening and stage 2, the appropriate assessment and integrity test. The effects of the plan in-combination with other plans or projects are the cumulative effects which will or might arise from the addition of the effects of other relevant plans or projects alongside the plan under consideration. Natural England have confirmed that the HRA provides a robust assessment of the proposed submission Plan in accordance with the requirements of the Conservations of Habitats and Species Regulations 2017 (as amended).</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</p> | | | | |
| 20. | <p>If the Habitats Regulations Assessment has identified, through ‘Appropriate Assessment’ that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes. Where required the site allocations policies include appropriate references. Specific policies contained in the Plan such as Policy ENV5: Impacts on International and European sites: Recreational Impact Avoidance & Mitigation Strategy ensure proposals are required to fully consider measures to ensure no likely effect.</p> <p>Implications of taking no further action:</p> <p>Mitigation / Action required (if necessary) to move scale to right:</p> <p>Reviewer Comments:</p> | | | | |
| 21. | <p>Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes. The process of habitat assessment is iterative. At each stage the HRA has been undertaken and/or updated and the findings have been incorporated into each stage of the Plan through specific site proposal criteria and are strategic policies. The final HRA December 2021) [EL A4] of the proposed submission version of Plan</p> | | | | |

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| | KEY QUESTIONS | Assessment | | | | |
| | | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | | <p>has been subject to appropriate assessment and integrity tests according to the statutory provisions laid out in the Habitats Regulations 2017 (as amended). It is concluded that the Plan is in conformity with the regulations and at a Plan level, a conclusion of <i>no</i> adverse effects, alone or in combination, on European site Integrity, is drawn.</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| | Housing Strategy | | | | | |
| 22. | <p>Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Yes, the policies and site allocations within the Plan can deliver the entire housing requirement. In conjunction with the Spatial Strategy, the housing targets are set out in detail in Policy HOU1 for each identified settlement, the remainder of the district and windfall development, which would deliver a minimum total of 9,600 new homes over the Plan period (2016-2036). The information is derived from the Housing & Economic Land Availability Assessment (HELAA) (April 2018) [EL H1], including capacities of the sites. Under the Duty to Cooperate Statement, Norfolk Strategic Planning Framework (May 2021) [EL A8.1] it has been agreed that North Norfolk will address its own needs and there is no need to address requirements from elsewhere.</p> | | | | |
| | | Implications of taking no further action for local plan soundness and/or effectiveness: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| G | <p>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</p> | <p>No, under the Duty to Cooperate Statement, Norfolk Strategic Planning Framework (May 2021) [EL A8.1] it has been agreed that North Norfolk will address its own needs and there is no need to address requirements from elsewhere.</p> | | | | |

| KEY QUESTIONS | | Assessment | | | | |
|----------------------|---|---|--|---|---|---|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 23. | Does your local plan policies update accommodate any of this unmet need where you can sustainably do so? | -2 No, we do not meet this requirement | -1 No, we may not fully meet this requirement | 0 Unclear whether our plan meets this requirement or not | +1 Yes, we are likely to meet this requirement | +2 Yes, we are confident our plan will meet this requirement |
| | | Reason for score: See above responses to Questions 22 and G. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 24. | Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period? Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory? | -2 No, we do not meet this requirement | -1 No, we may not fully meet this requirement | 0 Unclear whether our plan meets this requirement or not | +1 Yes, we are likely to meet this requirement | +2 Yes, we are confident our plan will meet this requirement |
| | | Reason for score: A Housing Trajectory has been prepared for the Plan, which sets out the total housing delivery that is made up of commitments, allocations and windfalls, taking account of a range of factors in relation to future delivery rates. The housing trajectory is set out in the Council's Annual Monitoring Report, the most recent report being 2021-2022 and Five Year Housing Land Supply Statement, most recent report being 2020. Delivery rates on the site allocations and in relation to commitments and future windfall have been tested. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 25. | Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery. | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Housing Trajectory and the HELAA (April 2018) [EL H1] demonstrate both (i) and (ii) in terms of a deliverable housing land supply on specific sites for the remainder of the Plan period to 2036. A 5% delivery buffer has been included within the trajectory to deal with under-delivery. The Council expects delivery rates to be variable over the Plan period, with the two largest identified sites at North Walsham and Fakenham likely to fully deliver beyond the Plan period. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 26. | Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes. In addition to the affordability uplift which is required by the standard methodology the target includes a delivery buffer to provide for flexibility. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| 27. | Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes. Windfall provision has been a steady and important historical source of development in North Norfolk and, is expected to continue to contribute to the supply in the future. However, in preparing the Plan the Council has been realistic and has reduced its expectations in relation to future windfall housing to a figure that | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | confirm that such sites will continue to come forward? | equates to around 50% of the historic rate and has carefully assessed the likely future supply of development derived in this way. As such, the Plan incorporates a windfall delivery figure of 1,890 dwellings (averaging at 135 dwellings between 2022-2036), as set out in the Council’s housing requirement in Policy HOU1 and the Housing Trajectory. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 28. | Does the local plan policies update make it clear what size, type and tenure of housing is required? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Policy HOU 2 Delivering the Right Mix of Homes, sets out the requirement for the type, size and tenure of homes that need to be provided in order to meet the needs of the existing and future local population, including in terms of affordable housing, self-build plots and specialist elderly/ care provision. This has been informed by the North Norfolk Local Housing Needs Assessment (updated)(November 2019) [EL E1]and Norfolk Older Persons Housing Options Study (November 2021) [EL E5]. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 29. | Does the local plan policies update specifically address the needs of different groups in the community? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, Policy HOU1 Delivering Sufficient Homes, addresses needs for elderly person’s accommodation and also, there are two topic based policies, Policy HOU4 Essential Rural Worker Accommodation and Policy HOU5 Gypsy, Traveller & Travelling Showpeople’s Accommodation that directly address the specific needs of these groups. Policy HOU3 in addition seeks to address a proven local need for affordable housing. | | | | |
| | | Implications of taking no further action: | | | | |

| KEY QUESTIONS | | Assessment | | | | |
|----------------------|--|--|--|--|---|---|
| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 30. | <p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: YES The affordable housing requirements within the Plan are robustly evidenced and justified through the Strategic Housing Marketing Assessment (update) (November 2019) [EL E1]. A need for 1,998 is identified in Figure 83 page 101. | | | | |
| | | The Plan includes a specific target (in Policy HOU1) to deliver a minimum of 2,000 affordable dwellings. Potential sources of affordable homes have been tested to ensure that at least this minimum can be provided. There is no upper limit to the amount of affordable homes, which can be provided via rural exceptions (Policy HOU3) and Community-Led Development (Policy SS3). | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 31. | <p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Policy HOU5 Gypsy, Traveller & Travelling Showpeople’s Accommodation sets out the approach to both permanently occupied and transit pitches for gypsy and traveller communities. This is supported by the Norfolk Caravans and Houseboats Accommodation Needs Assessment (October 2017) [EL E3], which concluded that future need for permanently occupied pitches in North Norfolk was likely to be very small and that existing transit pitches in Fakenham and Cromer have proved to be sufficient to address seasonal needs in the Plan period. | | | | |
| | | Implications of taking no further action: | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 32. | Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: As informed by the Norfolk Caravans and Houseboats Accommodation Needs Assessment (October 2017) [EL E3], there is currently no evidence that demonstrates that there is a need for additional pitches to be provided within the district. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| H | List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery | There are two existing dedicated transit traveller sites within the district at Cromer and Fakenham. No further sites are proposed within the Plan, as the evidence mentioned above, does not demonstrate such a need. | | | | |
| Justified approaches to plan policy and content | | | | | | |
| 33. | Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |

| | | Assessment | | | | |
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| | KEY QUESTIONS | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | [You may wish to check each policy setting a threshold] | <p>Reason for score: A number of strategic policies include thresholds that trigger certain policy requirements, for example Policy HOU2 Delivering the Right Mix of Homes, which sets a requirement for affordable housing and a threshold from which it applies. These thresholds are considered to be justified by relevant evidence, which is cited in the supporting text from national statistics to district studies. Further information is included in Background Paper 1, Approach to setting the Housing Requirement [EL C1]. A Local Plan Viability Assessment (September 2022) [EL I11] supports the delivery of the Plan. The full details for some policies, such as CC10 Biodiversity Net Gain, are still emerging and consequently it is likely that a future Supplementary Planning Document (SPD) will need to be created to support the implementation of the policy. The policy aligns with the thresholds supported in the Environment Act 2021.</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 34. | Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear why matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Plan is a standalone single local plan covering the Districts needs for the period 2016 – 2036. It incorporates strategic policies and strategic site allocations. Individual policies will be supported by existing and future Supplementary Planning Documents (SPDs) to provide further detail on certain aspects, for example, the existing Landscape Character Assessment 2021 SPD [EL J7]. Strategic matters are defined in the policies themselves and in all cases, a SPD is used to provide greater detail and guidance that is too great to include in the Plan.</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| | | -2 | -1 | 0 | +1 | +2 |

| | | Assessment | | | | |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 35. | <p>Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy?</p> <p>[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]</p> | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Settlement hierarchy, within the Spatial Strategy at Policy SS1, provides the overall framework and settlement hierarchy to deliver the necessary growth in the District, where the all of the other strategic policies support and complement this hierarchy, in accordance with the NPPF. Energy hierarchy, which forms the framework for the implementation of Policy CC3 Sustainable Construction, Energy Efficiency & Carbon Reduction. Drainage hierarchy, relates to Policy CC7 Flood Risk & Surface Water Drainage, where proposals must demonstrate that they have followed a hierarchy of drainage options. Biodiversity mitigation hierarchy, is set out in Policy CC10 Biodiversity Net Gain and in detail within Table 1: Applying the Mitigation Hierarchy, which ensures biodiversity net gain is achieved through avoidance, mitigation or compensation, as a last resort. Retail hierarchy, is contained within Policy E4, in order to maintain and enhance the vitality and viability of town centres and local centres. The cumulative strategic policies reflect these hierarchical approaches and as such, ensure the status and level of protection for environmental designations and heritage assets are taken into account. The approaches of the different hierarchies are considered to be consistent with the NPPF.</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 36. | <p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Policies that limit certain uses do so from the Council’s evidence base and are consistent with national policy. The Plan’s economic policies include employment, retail and tourism policies that refer to the approach to these respective uses. The supporting text clearly justifies them and references the relevant local evidence.</p> | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 37. | <p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development? Where relevant, are they consistent with the principles set out in the National Design Code and National Model Design Code?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Where policies refer to specific standards for proposed development, such as Policy HOU9 Minimum Space Standards, these are nationally described standards and as such, they are considered to be both justifiable and deliverable as set out in the policy. Where necessary, a detailed background paper accompanies and supports the Plan, for example, Background Paper 7, Housing Construction Standards (updated) (May 2023) [EL C7]. This Paper informs and justifies the requirements for the minimum space standards, the approach to energy efficiency and adaptable and accessible housing. Other policies, such as Policy HC7, Parking Provision, refer to Norfolk County Council parking guidelines (2022) [EL I4]. However, such policies build in enough flexibility so that they can be departed from where adequately justified.</p> <p>It is considered that where design standards have been proposed in the Plan they are consistent with the key principles of the National Design Guide and National Model Design Code.</p> <p>The setting of locally derived Open Space standards contained in Policy HC2 are justified through quantitative and qualitative review contained in the Open Space Assessment and Appendices (2020) [EL G11/ G12].</p> | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| Deliverability | | | | | | |
| 38. | <p>Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Plan has been comprehensively assessed for viability. The updated Local Plan Viability Assessment (September 2022) [EL I11] has been carried out by external consultants, which informs the Plan. All policies of the Plan have been tested and costs included in this final iteration of the viability assessment. The assessment has also informed the policy percentages for affordable housing and the affordable housing zones. The affordable housing requirements have not been set at the maximum levels of viability in order to provide a viability cushion. The Council has not implemented a CIL.</p> | | | | |
| | | <p>Implications of taking no further action:</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> | | | | |
| | | <p>Reviewer Comments:</p> | | | | |
| 39. | <p>Does the local plan policies update reflect the conclusions and recommendations of your viability evidence?</p> <p>Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: The Plan reflects the findings of the Viability Assessment. It concludes that the development proposed by the Plan is viable and deliverable taking account of the cost impacts of the policies and requirements for viability assessment set out in the NPPF. The affordable housing requirements have not been set at the maximum levels of viability in order to provide a viability cushion.</p> | | | | |
| | | <p>Implications of taking no further action:</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> | | | | |
| | | <p>Reviewer Comments:</p> | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 40. | Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: There is a monitoring framework set out in the Plan (at Chapter 24), which comprehensively sets out what matters will be monitored in relation to the strategic objectives (aligned with the Plans Aims and Objectives), by way of a set of key indicators and states any relevant targets. In addition, the Sustainability Appraisal objectives and their respective monitoring indicators are listed. The Council publishes an Annual Monitoring Report (AMR) where the content allows the Council to monitor progress against a range of Plan targets and also test the effectiveness of policies contained in the adopted local plan and where the information is used in the development of the Plan. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 41. | Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>? Where triggers for plan review and/or update are identified are they justified and proportionate? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: As stated above, the Council publishes an Annual Monitoring Report (AMR) where the content allows the Council to monitor progress against a range of targets and also test the effectiveness of policies contained in the Plan and where the information is used in the development of the emerging Plan. Going forward, the AMR will be used in part as a trigger to either initiate a review of the Plan or of specific policies. The NPPF para. 33 requires plans to be reviewed every five years. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| Plan effectiveness (and associated policy clarity) | | | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 42. | Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u>? Does the evidence relied on to support those policies correspond/cover this whole period? Where larger scale developments are proposed as part of the strategy, does the vision look further ahead (at least 30 years)? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Plan period is clearly defined as being 2016-2036. The Plan is mainly comprised of strategic policies. These are identified through Background Paper 12, Strategic Policies Identification (February 2023) [EL C12], which covers the identification of the relevant policies. A minor modification is proposed (PMIN/1.0/01) to the introduction of the Plan, which includes, amongst other matters, new paragraph 1.0.3, which states that the "...Plan contains the following elements... The Strategic Policies and Development Management policies, which guide..." and new paragraph 1.0.4, which states "The strategic policies are set out in Appendix 6". The proposed modification also seeks to add new Appendix 6, which details the strategic policies as identified through Background Paper 12. The evidence supporting the Plan covers the whole period. It is considered that the Plan provides for 15 years growth, and a policy framework which can be applied over 15 years in the way anticipated in the NPPF. In particular the Plan states at para 7.1.10 that the strategic urban extensions at North Walsham and Fakenham are likely to continue to deliver growth beyond 2036. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |
| 43. | Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The emerging Plan and Policies Map will entirely supersede the current Core Strategy, Site Allocations DPD and the Proposals Map. The purpose of the Plan has been further clarified by a minor modification to the Introduction, as set out above. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| 44. | Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The Aims and Objectives of the Plan are clearly set out in Chapter 2.2-2.4 of the document, which are grouped into 5 categories, and these are linked to achieve the Vision for North Norfolk and the key challenge to manage and adapt to climate change. These principles are embedded throughout the plan policies and site allocations. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| Reviewer Comments: | | | | | | |
| 45. | For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map? Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes. (i) Each policy area is clearly explained in the Plan and for consistency (ii) the same policy areas have been used to spatially navigate and define relevant policies on the Policies Map. The legibility of the maps and graphics are considered to be clear and comprehensive in aiding the understanding their purpose within the Plan. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| Reviewer Comments: | | | | | | |
| 46. | Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording? | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: The supporting text for each policy commences with a paragraph setting out the purpose of the policy. The Glossary also defines many development terms within the document. As such, it is clear what development type the policy applies to and it is phrased in a positive way to express the parameters for which | | | | |

| KEY QUESTIONS | | Assessment | | | | |
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| | | <p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p> | | | | |
| | | <p>planning permission will be supported, rather than through stating negatively what will not be acceptable. Consequently, the Plan is considered to have been positively prepared.</p> | | | | |
| | | <p>Implications of taking no further action:</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right:</p> | | | | |
| <p>47.</p> <p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p> <p>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p> | | <p>Reviewer Comments:</p> | | | | |
| | | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | <p>Reason for score: Many policies clearly stipulate the types of development/ uses, and many include the scale and location of these proposals. For example, Policy HOU2 comprehensively sets out the requirements for level, type and mix of affordable housing, mix of market dwellings, as well as self-build plots and specialist elderly/ care provision in relation to the number of dwellings proposed and affordable housing zones.</p> <p>There is a small number of policies which have emerging details, such as Policy CC10 Biodiversity Net Gain and Policy CC13 Protecting Environmental Quality (in regards to Nutrient Neutrality), where the policy has been as accurate as possible by using the term ‘qualifying development.’ A number of other policies, for example, Policy CC9 Sustainable Transport, Policy CC11 Green Infrastructure do not state any particular scale, use or locational criteria.</p> | | | | |
| | | <p>Implications of taking no further action: see below.</p> | | | | |
| | | <p>Mitigation / Action required (if necessary) to move scale to right: there would be potential to modify language, as informed by the Planning Inspector, to clarify the application of policies where this is differentiated based on scale, use or location, where this is not considered clear.</p> | | | | |
| | | <p>Reviewer Comments:</p> | | | | |

| | | Assessment | | | | |
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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| I | <p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p> | <p>There are seventy-eight policies in the Plan, consisting of one overarching policy relating to delivering climate resilient sustainable growth, one regarding spatial development strategy, forty-eight topic based policies and twenty-eight relating to each of the site allocations.</p> <p>The Plan has been checked to remove as much repetition of wording as possible between policies. Some references to the NPPF is inevitable within the Plan, in order to set the national planning context when introducing and adding local distinction and detail in order to ensure local priorities and aims are met. There is some cross referencing with the Plan to other policies, which is a deliberate approach to ensure users are signposted to other particularly relevant policies (notwithstanding the expectation that the Plan should be read as a whole).</p> | | | | |
| 48. | <p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: As above. The Plan has been written so as to minimise repetition of national policies. A degree of repetition is, however, inevitable in order to support the provide continuity to the Plan. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| Reviewer Comments: Any policy/ text repetitions that are deemed unnecessary can be filtered out through the examination process. | | | | | | |
| 49. | <p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: There are small areas of overlap, but where the policy requirements are more progressive. For example, Policy CC3, which incorporates carbon neutral increased standards in order to evoke technical standards in relation to local distinction in accordance with the NPPF. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |

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| KEY QUESTIONS | | <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i> | | | | |
| | | Reviewer Comments: It is recognised that there is the potential that increased standards may be introduced through future homes standards and further changes to building regulations. However, not introducing the minimum space standards and adaptable / accessible housing requirements will undermine the local need and not deliver on sustainable development for North Norfolk. | | | | |
| 50. | <p>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</p> <p>[For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]</p> | -2 | -1 | 0 | +1 | +2 |
| | | No, we do not meet this requirement | No, we may not fully meet this requirement | Unclear whether our plan meets this requirement or not | Yes, we are likely to meet this requirement | Yes, we are confident our plan will meet this requirement |
| | | Reason for score: Yes, there are a number of references to the ‘appropriate details’ or ‘appropriate information’ in some plan policies, however, these terms are contextualised within the supporting text or Appendices. For example, Policy CC7 Flood Risk & Surface Water Drainage refers to ‘appropriate information’ at criteria 7, but clearly signposts the reader to Appendix 1 for detailed information. | | | | |
| | | Implications of taking no further action: | | | | |
| | | Mitigation / Action required (if necessary) to move scale to right: | | | | |
| | | Reviewer Comments: | | | | |

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| Date of assessment: | May 2023 |
| Assessed by: | Caroline Dodden – Senior Planning Officer |
| Checked by: | Iain Withington – Planning Policy Team Leader |
| Overall Score: | 75/100 |
| Comments: | The Council considers that the submitted Plan, along with the proposed additional modifications, reflects the district’s ambitions. The Plan has been positively prepared and justified through robust and proportional evidence, which is consistent with national policy. |

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