

North Norfolk District Council

North Norfolk Local Plan Statement of Compliance with the Duty to Cooperate

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1. Introduction & Context

- 1.1 The Duty to Cooperate places a legal duty on local planning authorities, county councils and some public bodies to engage on strategic cross boundary matters that have a bearing on local plan preparation. A local planning authority must demonstrate how it has complied with the duty at the independent examination of its Local Plan. An authority will need to satisfy itself particularly that cooperation has produced effective and deliverable policies on strategic cross boundary matters. As compliance with the duty is a legal requirement and relates to the process of preparing a plan the examining Inspector will not have the opportunity to modify the Plan to ensure the duty has been discharged.
- 1.2 In late 2022 government consulted on proposed changes to the planning system in England including a streamlining of the plan making process and the potential abolition of the duty to cooperate and its replacement with an 'alignment' test. At the time of writing the results of the consultation had not been published. North Norfolk indicated its support for removal of the Duty provided an alternative method of addressing cross boundary issues was instigated.
- 1.3 The purpose of this statement is to set out how North Norfolk District Council has discharged the Duty and how the outcomes of cooperation have influenced the preparation of the North Norfolk Local Plan 2036 and, more particularly, its policies.
- 1.4 As a result of co-operation across the administrative boundaries of Norfolk, plan making has been demonstrably more effective across a number of strategic issues and has directly informed policy development. In some instances, it has resulted in standardised policies and approaches being applied across all authorities in Norfolk.
- 1.5 **Section 2** of this statement provides an overview of how the duty to cooperate is intended to operate in practice, including the relevant legislation and guidance.
- 1.6 **Section 3** considers those strategic cross boundary issues that are relevant to the preparation of the local plan in North Norfolk; explains what the local planning authority has done proactively to meet the duty to cooperate on relevant strategic issues and details the policy outcomes.

Context

- 1.7 North Norfolk is a large rural District located on the North Sea coast of Norfolk. It shares borders with Kings Lynn and West Norfolk Borough Council, Breckland District Council, Broadland District Council, Great Yarmouth Borough Council and the Broads Authority. Norfolk County Council is the Minerals and Waste Planning Authority, Lead Flood Risk Authority and Education Authority and the provider of many key services. North Norfolk is preparing a new Local Plan for the District with policies and proposals for the future use and development of land, some of which will have impacts beyond the administrative boundaries of the District. Similarly, adjacent Planning Authorities are also at various stages of the plan making process.
- 1.8 In 2015 these Authorities and other key 'cooperative' bodies formed the Norfolk Strategic Planning Forum. This Forum has the remit to identify and ensure that cross boundary strategic planning issues are properly considered in the Plan making process on behalf of all Norfolk Authorities. To this end the Forum has prepared and published the Norfolk Strategic Planning Framework and Statement of Common Ground which

documents the process and outcomes of co-operation [EL A8.1 and A8.2]. These outcomes take the form of specific formal agreements between the partners some of which have resulted in joint policy approaches.

1.9 Principle co-operative activities of the Forum include:

- Defining an appropriate geography within which the duty should be applied
- Identification of key strategic cross boundary issues
- Development of a shared vision for growth in the County
- Joint commissioning of topic-based evidence
- Completion of shared Agreements
- Development of shared policies and approaches.
- Ongoing review.

1.10 Alongside the preparation of the NSPF, North Norfolk has worked closely with a number of strategic partners and consultees to ensure that cross boundary issues are properly considered and that policy outcomes are effective and deliverable. This is particularly the case in relation to the preparation of aspects of the Plans evidence base including capacity studies (HELAAs), Sustainability Appraisal, Habitat Regulation Assessment and Heritage Impact Assessments which have all been prepared with input from statutory consultees and partners. The selection of site allocations has included extensive input from a broad range of bodies to ensure their suitability and deliverability.

1.11 Outside of two larger growth towns (North Walsham and Fakenham) the growth proposed in the Local Plan is comparatively modest in scale and its impacts are mainly localised and contained to North Norfolk. However, key service and infrastructure providers such as the County Council and the Health Authorities operate over geographical areas which are not contiguous with those of the District Council. Housing markets, travel to work areas, service provision, transport networks and many other aspects of daily life have impacts across administrative boundaries. Principle issues (not limited too) of strategic significance applicable to the production of the North Norfolk Local Plan which relate to two or more Authorities include:

- Reducing and mitigating the impacts of climate change
- Delivery of sufficient homes, including gypsy and traveller provision
- Management of designated landscapes
- Disposal of foul and surface water in accordance with the Habitat Regulations (Nutrient Neutrality)
- Cross boundary highway impacts
- Delivery of supporting infrastructure such as health and education
- Efficient use of water
- Hoveton/Wroxham (Cross boundary community/shared town centre)
- Coastal management
- Green Infrastructure and Recreational impact Avoidance Strategy (GIRAMS)

1.10 Each of these areas are considered in **Section 3**.

2. Legislative Background

- 2.1. This section provides an overview of the legislative background to the duty to cooperate and related national guidance.

Statutory Requirements

- 2.2. The statutory provisions relating to the duty to cooperate are set out in section 110 of the Localism Act 2011. This section amends section 33 of the Planning and Compulsory Purchase Act 2004 by setting out the *“duty to cooperate in relation to planning of sustainable development”*.
- 2.3. The main provisions are to require cooperation between local planning authorities, county councils and prescribed bodies, or persons, in the preparation of development plan documents so far as this relates to a strategic matter applicable to two or more administrative areas. The duty requires the relevant bodies to engage *“constructively, actively and on an ongoing basis”*.
- 2.4. *“Strategic matter”* is defined as sustainable development or land use, including for strategic infrastructure, which would have a significant impact on at least two local authorities’ administrative planning areas; and in a two-tier area where the development or use is a county matter or has or would have a significant impact on a county matter.
- 2.5. The legislation also requires assessment of whether the local planning authority has complied with the duty to be considered as part of the independent examination of its Plan. A local planning authority and other duty to cooperate bodies must have regard to any guidance given by the Secretary of State about *how* the duty is to be complied with. Currently, there is no prescribed method which must be followed to discharge the duty.

National Guidance

- 2.6. The *National Planning Policy Framework* (the Framework) includes general and specific guidance with regard to the duty to cooperate. It states that, amongst other criteria, local plans should *“be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations”*.
- 2.7. The Framework also states that *“public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in the framework; that “local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual local plans”; and that “local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination”*.

- 2.8. The *Planning Practice Guidance* (PPG) includes a section on the duty to cooperate. This reiterates the statutory requirements and elaborates on the guidance included in the Framework. The main points are:
- Local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their local plans for examination.
 - The prescribed public bodies (see below) play a key role in delivering local aspirations and cooperation between them and local planning authorities is vital to make local plans as effective as possible on strategic cross boundary matters.
 - Local planning authorities must cooperate with Local Enterprise Partnerships and Local Nature Partnerships and have regard to their activities when they are preparing their local plans, so long as those activities are relevant to local plan making.
- 2.9. The duty requires active and on-going engagement. Local planning authorities and other public bodies must work together constructively from the outset of plan preparation to maximise the effectiveness of strategic planning policies.
- 2.10. Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination (this statement).
- 2.11. Local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. That will help to identify and assess the implications of any strategic cross boundary issues on which they to work together and maximise the effectiveness of local plans.
- 2.12. Planning for infrastructure is a key requirement of the effectiveness element of the test of local plan soundness, which requires plans to be deliverable and based on effective joint working on cross boundary strategic priorities.
- 2.13. Close cooperation between district local planning authorities and county councils in 2-tier areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.
- 2.14. The local planning authorities and public bodies that a local planning authority needs to cooperate with will depend on the strategic matters that the local planning authority is planning for and the most appropriate functional geography to gather evidence and develop planning policies.
- 2.15. It is important to adopt a pragmatic approach in deciding the area over which cooperation is needed and who to work with.
- 2.16. The Framework lists strategic priorities that should be addressed through strategic policies in the local plan, to deliver:
- The homes, including affordable housing, and jobs needed in the area;
 - The provision of retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - The provision of health, education, security, community and cultural infrastructure and other local facilities; and

- Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscapes and green infrastructure.
- 2.17. Additional guidance on how these strategic priorities should be addressed is set out in the Framework. More specifically, guidance is included that explicitly requires joint working where these strategic priorities might have cross boundary implications, and therefore clearly requires the duty to be enacted.
- 2.18. Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development, including large scale facilities such as rail freight interchanges, roadside facilities for motorists or transport investment necessary to support strategies for the growth of ports, airports or other major generators of travel demand in their areas.
- 2.19. In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate.
- 2.20. Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries.
- 2.21. Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market.
- 2.22. Local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.
- 2.23. The prescribed bodies for the purposes of the duty to cooperate, referred to in the primary legislation, are set out in regulations. These bodies are:
- the Environment Agency;
 - the Historic Buildings and Monuments Commission for England (known as English Heritage);
 - Natural England;
 - the Mayor of London;
 - the Civil Aviation Authority;
 - the Homes and Communities Agency;
 - each Clinical Commissioning Group established under section 14D of the National Health Service Act 2006;
 - the National Health Service Commissioning Board;
 - the Office of Rail Regulation;
 - Transport for London;

- each Integrated Transport Authority;
- each highway authority within the meaning of section 1 of the Highways Act 1980 (including the
- Secretary of State where the Secretary of State is the highways authority); and the Marine Management Organisation.

3. Process & Outcomes of Cooperation

3.1. North Norfolk has worked with a wide range of bodies and stakeholders in producing the North Norfolk Local Plan. The sections below demonstrate how strategic issues have been considered, the process followed, and how cooperation has contributed towards more effective policy outcomes where these issues impact more than one administrative area. Further details are published in the Consultation Statement that supports the Plan [EL A5].

The Norfolk Strategic Planning Framework (NSPF) & Statement of Common Ground

3.2. Norfolk's local planning authorities including Norfolk County Council have a long track record of working together to achieve shared objectives. In early 2015 the Strategic Planning Member Forum was established and agreed to formally cooperate on a range of cross-boundary approaches to strategic infrastructure, housing and jobs numbers and common policy approaches through the preparation of a Norfolk Strategic Framework document (NSPF). The first iteration of the NSPF was endorsed in October 2019. A revised and updated version was endorsed by the partners in spring 2021 and the partners are committed to a process of regular and on-going review. To prepare each Framework the partners have commissioned a wide range of joint evidence.

3.3. The first version of the NSPF (2019) set out twenty-five formal Agreements. The Agreements reflected the revisions to the NPPF made in 2019 including the requirement to apply a new standardised methodology to assessing housing need and to produce Statements of Common Ground as part of the Duty.

3.4. The revised NSPF 2021 sets out thirty joint Agreements across a wide range of cross boundary issues with the overall aim to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of local plans;
- Demonstrate compliance with the duty to co-operate and consistency with the revisions to the NPPF made in 2019;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence high-level plans (such as the New Anglia LEP's Economic Strategy, the Local Industrial Strategy, the Covid 19 Recovery Start Plan) and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

3.5. The updates in 2021 sought to ensure the NSPF is up-to-date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- Green infrastructure and recreational avoidance and mitigation and the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites;
- An assessment of the housing needs of the elderly and the types of accommodation required;
- Consideration of the actions that LPAs can take to help mitigate and adapt to climate change;

- A new health section to highlight the importance of health provision and healthy living as a strategic cross boundary issue;
- Shared guidance on the role out of 5G and to help improve fibre broadband connectivity;
- Updates to take account of new information.

NSPF Coverage - Parties Involved

- 3.6. There are seven separate Local Planning Authorities in Norfolk – Norwich City Council, Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, Borough Council of King’s Lynn and West Norfolk, North Norfolk District Council and South Norfolk Council. In addition, the Broads Authority is the local planning authority for parts of some districts. All are active members of the forum and to varying extents share overlapping housing markets and travel to work areas.
- 3.7. Norfolk County Council is the local planning authority responsible for minerals and waste planning and highways, as well as certain operational development related to their functions (most notably education). Norfolk County Council is a member of the forum, provides the secretariat, and manages the partnership web site. The Partnership employs a single staff member, co-funded by the partners and employed by Norwich City Council. Further staff resource is provided by each of the member Authorities comprising policy leads or team leaders with work progressed via topic based sub-groups.

Working arrangements

- 3.8. The Forum comprises of elected members from each of the Norfolk district councils and the Broads Authority together with Norfolk County Council (the ‘Core Group’) which meet quarterly. They are supported by the Norfolk Strategic Planning Officer Group (NSPG) which meets on a monthly basis to progress strategic matters under the Duty.
- 3.9. The forum’s overall purpose is to ensure that the requirements of the D to C when preparing development plans are discharged in a way which enhances the coverage of strategic planning matters and minimises the risk of unsound plans. It provides the political input and steerage necessary to discharge the Duty. Although the forum is not a decision-making body, it recommends actions to partner authorities, aiming to reach a consensus where possible. Its recommendations are not binding on the actions of any of the partners although all have accepted and endorsed its recommendations to date.
- 3.10. Several working groups recently updated the NSPF. These groups consist of local authority staff assisted by other organisations including the Environment Agency, Natural England, NHS Sustainability and Transformation Partnership (STP), Anglian Water, UK Power Networks and the New Anglia Local Enterprise Partnership. Further information on the work of the Norfolk Strategic Planning Member Forum and about the process for updating the framework, including the minutes of the meetings, are available on the Norfolk County Council’s website (www.norfolk.gov.uk/nsf)
- 3.11. Through the NSPF, all Norfolk LPAs have agreed to plan to at least 2036 in their emerging local plans. This is reflected in the evidence base for the Framework which provides statistical information for this period as well as in the formal agreements entered into within the Framework. The Framework includes a shared vision for the management of development across the county which is the foundation for the

preparation of Local Plans including the North Norfolk Local Plan. The overall vision and key objectives of the North Norfolk Local Plan are fully aligned with the agreed county wide vision, and these visions are the foundation for subsequent policy development.

- 3.12. The NSPF, states that LPAs, with the exception of the Broads Authority, will provide for their own housing and jobs growth needs within their own boundaries, strengthen the economy, respond to climate change, address housing needs, aim to improve quality of life and health, improve and conserve Norfolk's rich and diverse environment and work jointly to maximise the opportunities to secure external funding to deliver against agreed objectives.

The Norfolk Strategic Planning Officers Group (NSPG)

- 3.13. The NSPG supports the Member Forum. It consists of planning policy officers from each LPA in Norfolk, the County Council and the Environment Agency, as well as other disciplines and key statutory agencies which attend meetings as appropriate. The group reviews the progress of NSPF updating on a monthly basis, ensuring that the document progresses to the timetable and meets any government and legislative requirements. Meetings remain ongoing.

Liaison with regional organisations

- 3.14. A representative of the NSPG sits on the regional Strategic Spatial Planning Officer Liaison Group (SSPOLG) which supports planning cooperation across the Region.

Additional Partnership Working

- 3.15. In addition to, and alongside the work undertaken by the forum, the Authority has worked in partnership with a wide range of organisations in the preparation of the Plan. This includes but is not limited to:

County Local Plan Meetings

- 3.16. Between North Norfolk District Council and Norfolk County Council: Senior Officer Group with a core member of the NNDC Policy Manager and Team Leader and NCC department leads for infrastructure/spatial planning, Highways, Children's services (education), Public Health, Minerals and Waste, Natural Environment, Lead Local Flood Authority, (LLFA) and Norfolk Property Services, (NPS) held approximately every six months.

Development Management Officers Group (DMO Group)

- 3.17. Senior DM officer group with a core membership of Officers including Norfolk County Council, South Norfolk Council, Broadland District Council, Norwich City Council, King's Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, the Broads Authority, Breckland District Council, the Lead Local Flood Authority and Norfolk County Highways. Meetings are held on a quarterly basis. The main aim of the group is to provide a strategic level update on issues affecting each District in attendance in relation to Development management practices.

Norfolk Coast Partnership (AONB)

- 3.18. Officer and Councillor representation on the Core Management Group, with other key stakeholders being Kings Lynn and West Norfolk Borough Council, Great Yarmouth Borough Council, Natural England, Norfolk County Council, Broads Authority and Community representatives. Meetings are held approximately four times a year. The

main aim of The Partnership is to deliver statutory duties required from Section 85 of the Countryside and Rights of Way Act 2000, which places a duty on relevant local authorities and public bodies, in exercising or performing any functions in relation to, or which affect, land in an AONB to have regard to the purpose of conserving and enhancing the natural beauty of an AONB. An updated 5-year Management Plan, 2019-2024 has recently been endorsed by the Council. A Partnership Forum meets twice yearly and is made up of representatives from all of the partners and five community representatives elected by parishes in the area.

Coastal Partnership East

- 3.19. Coastal Partnership East brings together the coastal management expertise from three coastal local authorities into a single team; North Norfolk District Council, Great Yarmouth Borough Council, and East Suffolk Council. Coastal Partnership East is responsible for 92km of the 173km of coastline in Norfolk and Suffolk, from Holkham in North Norfolk to Landguard Point in Felixstowe. The three Councils covering most of the Norfolk and Suffolk coast, agreed to a partnership model to address these jointly shared issues. The partnership authorities operate through an integrated Coastal Zone Management, (ICZM) approach as evidenced by the Norfolk and Suffolk Coastal Authorities Statement of Common Ground for Coastal Zone Planning 2018. As coastal erosion risk management authorities, East Suffolk Council, Great Yarmouth Borough Council, and North Norfolk District Council are signatories to the Coastal Concordat for England.
- 3.20. Local Plan policies in coastal locations along with wider approaches to coastal change management have been informed and evidenced through the joint approach and the utilisation of shared evidence bases such as Shore Line Management Plans, (SMPs). As key sources of evidence SMPs are integral to the formulation of Local Plan policy in respect of the coast, in particular the identification of the Coastal Change Management Area, (CCMA).
- 3.21. An emerging Coastal Adaptation Supplementary Planning Document, SPD has been prepared through the partnership with The Broads Authority (The Broads). An initial consultation was held between 4 September 2020 and 16 October 2020 and the responses received have helped to prepare a final draft document which was consulted on between January 25th 2023 and March 8th 2023.
- 3.22. The Coastal Adaptation SPD provides guidance to the implementation of the four authorities Local Plans and emerging Local policy approaches along the coastline and supports the implementation of the policies, providing case study examples of coastal adaptation best practice and will:
 - Ensure Coastal Communities continue to prosper and can adapt to coastal change; and
 - Provide detailed guidance for developers, landowners, development management teams, and elected members on the interpretation of policies with a whole coast approach.

Further information can be obtained from: <https://www.coasteast.org.uk/about-us>

Further information on the emerging SPD and associated documents can be found <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/planning-policy-consultations>

Public Engagement

- 3.23. Members of the public, as well as developers, landowners and agents were encouraged to sign up to the Local Plan Database. Subscribers were kept up to date on progress and opportunities to get involved via newsletters and other notifications were sent where appropriate. Registration was through the following web link: www.north-norfolk.gov.uk/tasks/planning-policy/register-for-updates-on-the-local-plan
- 3.24. The following section sets out on a thematic basis how the Norfolk authorities have sought to address the strategic priorities listed in NPPF 2019 and 2021. In some cases, reference is made to partnership working in addition to the work undertaken through the NSPF Statement of Common Ground. The section sets out, in brief, how the NSPF and other evidence on strategic cross-boundary issues has informed the content of the North Norfolk Local Plan on the key themes. Some additional evidence studies have included collaboration with bodies prescribed under the D to C. The evidence, which has been updated where required as plan-making has progressed, is highlighted in the sections below. Much of the evidence has also been subject to separate processes of consultation and engagement.
- 3.25. Where relevant, the Council has been working with, and will continue to liaise on agreeing Statements of Common Ground to provide clarity on any issues raised for the examination.

4. Housing

Strategic Planning Issue

Meeting Housing Need including affordable housing and Gypsy and Traveller Accommodation – Setting the scale, distribution and location of housing and addressing housing need for North Norfolk and the surrounding area.

Evidence Base

- NSPF (2019) [EL A8.2] and NSPF (2021) [EL A8.1]
- HELAA Addendum III (Dec 2020) [EL D13-D16]
- HELAA Addendum II (January 2020) [EL D13-D16]
- HELAA Addendum I (October 2018) [EL D13-D16]
- Housing and Economic Land Availability Assessment (HELAA) (December 2017) [EL D13-D16]
- North Norfolk Housing Needs Assessment (HNA) (2019) [EL E1]
- Central Norfolk Strategic Housing Market Assessment (SHMA) (2017) [EL E2]
- Norfolk Caravans and Houseboats Accommodation Needs Assessment (ANA) including for Gypsies, Travellers and Travelling Show people (October 2017) [EL E3]
- Norfolk Older Persons Housing Options Study (Nov 2021) [EL E5]
- Accommodation for Older People- Current Supply, Current Need and Future Need [EL E8]

Strategic Partners

- SHMA: Norfolk County Council, Breckland District Council, Broadland District Council, South Norfolk District Council, Norwich City Council, and the Broads Authority
- HELAA: Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council
- Caravans and Houseboats Study: South Norfolk, Broads Authority, Norwich City Council, Norfolk County Council, Broadland DC, North Norfolk DC, Great Yarmouth BC. Consultations with: King's Lynn and West Norfolk, Mid Suffolk, and Waveney.
- Older Persons Housing Options Study: County Council, all Norfolk planning authorities
- Accommodation for Older people (Supply and Need Study): County Council, all Norfolk planning authorities

Summary of Evidence

- Strategic Housing Market Assessment (SHMA) (2017)

The overall housing requirement for North Norfolk is based on the Government's standard methodology with a local variation using an alternative demographic starting point. It is supported by evidence from the Strategic Housing Market Assessment SHMA (2017) and Housing Needs Assessment 2019. The SHMA was jointly commissioned by the five Central Norfolk local authorities to provide a consistent evidence base for housing across Central Norfolk area and to demonstrate that they had effectively cooperated with adjoining authorities on meeting development requirements. The study built on the work of the Central Norfolk SHMA

(2015) which was jointly commissioned by Norwich City, Broadland, Breckland and North Norfolk, together with the Broads (with Norfolk County Council also a non-commissioner partner).

- **The North Norfolk Housing Needs Assessment (HNA) (2019)**

The North Norfolk Housing Needs Assessment (HNA) 2019 update was commissioned to look in detail at the underlying demographic evidence used in the calculation of housing need, and in particular, to consider the difference between the 2014 and 2016 based national population and household projections. It concluded that the key differences could be explained by Unattributable Population Change (UPC) errors in the 2014 based projections and the improved forecasting in the later 2016 projections, rather than any evidence of suppressed household formation rates.

- **Norfolk Caravans and Houseboats Accommodation Needs Assessment Including for Gypsies, Travellers and Travelling Show people (2017) and Gypsy and Travellers Addendum (2021)**

The Accommodation Needs Assessment (ANA) (2017) assessed the supply and accommodation needs of Gypsies and Travellers, Travelling Show People, residential boat dwellers and residential caravan dwellers for much of Norfolk, along with the Broads Authority, North Norfolk and Great Yarmouth, for the period 2017-2036. For North Norfolk it concludes very modest levels of additional need for these types of accommodation. These needs are part of, and not an addition to, the overall assessment of need in the Strategic Housing Market Assessment.

- **Housing Options and older persons supply and need studies**

Quantify the specific needs of the elderly, the quantity, type and distribution of existing supply, likely future needs, and need requirements for defined catchment areas up to 2036.

- **Norfolk Housing and Economic Land Availability Assessment (HELAA) (2018-20)**

The Housing and Economic Land Availability Assessments (HELAA) are key evidence documents which support the preparation of local plans. As part of the D to C, they use a consistent methodology across all of the planning authorities in Norfolk.

HELAA establish how much suitable development land is available in any area and how much growth can be accommodated as a result. The Norfolk HELAA has provided the evidence to show that the district LPAs in the county can meet their own growth needs in their own areas (as set out in Agreement 11 of the NSPF 2021). The HELAA has also been used in the Norfolk local plans including the North Norfolk Local Plan to assist the site selection process by helping to identify the most suitable sites for further assessment and finally allocation. As part of the HELAA Assessment a number of key organisations have contributed to this work such as: Anglian Water, Highways England, Norfolk Wildlife Trust, Norfolk Historic Environment, Highway Authority, Environmental Services, Children Services, LLFA, NCC Minerals and Waste.

The approach taken by North Norfolk on the use of the HELAA is in accordance with NSPF (2021) Agreement 16 (see below).

Outcomes of co-operation: Agreed commissioning of joint evidence, common approach to capacity assessment, housing agreements in NSPF (as below), local plan

policy development and final policies in Local Plan, on -going review and co-operation.

Agreement 4 - To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Agreement 13 - South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 16 - All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Outcomes set out in the North Norfolk Local Plan

The plan provides for all of North Norfolk's housing growth needs within its own area and does not provide for overspill from neighbouring districts as this has not been necessary (Policy HOU1). Notwithstanding that the Broads Authority has separately established and planned to meet its needs, the North Norfolk Local Plan also includes sufficient growth to address the Broads requirement as North Norfolk's assessment of need covers the entirety of the District, including that part administered by the Broads Authority.

Policies HOU1 - HOU5 and the Site Allocation policies provide for the housing needs of different parts of our community including Gypsies and Travellers, older people, and those in need of affordable homes.

Policies for larger site allocations include specific requirements to deliver a proportion of homes as various types of specialist accommodation for the elderly.

The policies of the Plan seek to address the needs for affordable homes and include a specific target to deliver 2,000 affordable dwellings.

Ongoing Cooperation

The Norfolk authorities continue to work cooperatively with neighbouring authorities on strategic housing issues as part of the on-going Norfolk Strategic Planning Framework and the Norfolk Strategic Member Forum. The evidence and the Framework will be subject to periodic review as required.

5. Economy

Strategic Planning Issue:

Delivering sustainable economic growth: Planning for the jobs needed in North Norfolk and the wider area, allocating employment land and working cooperatively to drive economic growth.

Evidence Base

- East of England Forecasting Model
- Norfolk and Suffolk Economic Strategy
- Local Industrial Strategy - New Anglia LEP
- North Norfolk Retail and Town Centre Study [EL.H3]
- Business Growth and Investment Opportunities Study (Nov 2015) [EL H7]
- Growth Sites Delivery Strategy (Nov 2021) [EL H6]

Strategic Partners D to C

- **Norfolk and Suffolk Economic Strategy:**
Babergh and Mid Suffolk Councils, Breckland District Council ,Broadland District Council ,Forest Heath District Council, Great Yarmouth Borough Council, Ipswich Borough Council ,Norfolk County Council, Norwich City Council, North Norfolk District Council, South Norfolk Council, St Edmundsbury Borough Council, Suffolk Coastal District Council, Suffolk County Council Waveney District Council, West Norfolk Council.
- **Regional Economic Strategies**
Regional strategies and initiatives include the New Anglia Local Enterprise Partnership's existing Norfolk and Suffolk Economic Strategy (NSES), the emerging Norfolk and Suffolk Local Industrial Strategy, which builds on the NSES, and the Cambridge Norwich Tech Corridor initiative.

Summary of Evidence

- **East of England Forecasting Model (EEFM).**
The EEFM has provided consistent economic forecasts annually for a range of partners including the New Anglia LEP, Norfolk CC, the NSPF, Greater Norwich and individual districts across the East of England. It therefore provides coverage for all the areas of the County supporting cross boundary cooperation on strategic matters and the setting of benchmark figures to monitor performance. It also provides a robust evidence base for fund bidding. The EEFM is overseen by a steering group of officers from upper tier authorities and the LEPs from the model area. It is prepared by the independent forecasting house Cambridge Economics.
- **North Norfolk Retail & Main Town Centre Uses Study (March 2017)**
Lichfield consultancy completed the Retail and Town Centre Study in 2017. It provides a quantitative and qualitative assessment of the health of the districts town centres and identifies likely future retail expenditure and floor space requirements.

The villages of Hoveton in North Norfolk and Wroxham in Broadland share a joint town centre. The main commercial area is administered by North Norfolk District Council with smaller areas controlled by the Broads Authority. NNDC and the Broads Authority have agreed a designated town centre area and adopted complementary policies in relation to retail developments in their respective Local Plans.

Outcomes set out in the NSPF

NSPF Agreement 9 - NSPF table 7 lists the Tier One Employment sites. It states the main employment uses on specific sites that should be the focus of investment to drive sustainable economic development in key sectors and that such sites should be protected from loss to other uses. Scottow Enterprise Park in North Norfolk is identified as a Teir 1 site.

The NSPF also outlines in section 5.4 Key Cross-Boundary Economic Issues and Interventions:

- That the Norwich urban area and its hinterland is a major regional centre and draws trade from an extensive catchment across Norfolk and the wider region. This forms part of the strong cross boundary functional economic relationships within Norfolk
- The importance of the Cambridge Norwich Tech Corridor to “maximise the economic benefits of this high-quality location with its world class universities, research institutes and business clusters” and the A47 east-west corridor.

Accordingly, NSPF agreement 10 states that local plans will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Outcomes set out in the North Norfolk Local Plan

Policies E1-E3 support and enable growth in the local economy, safeguard existing employment sites and provide a supply of future employment land.

Policy E4 maintains the vitality and viability of the districts town centres, guiding new retail development to town centre locations and ensures that the scale of growth is appropriate to each location.

Policies E6-E9 provide for sustainable growth of the local tourism economy.

Ongoing cooperation

Cooperation will be ongoing through future reviews of the NSPF, the Local Plan and other plans and programmes in the wider area.

6. Infrastructure/ Transport / Education / Utilities

Strategic Planning Issue

Provision of strategic infrastructure required to serve growth.

Evidence Base

- NSPF
- North Norfolk Infrastructure Position Statement [EL C4.1]
- North Norfolk Infrastructure Delivery Plan [EL C4]
- Site Assessment Booklets [EL D1-D12]

Strategic Partners D to C

- NSPF: Norfolk County Council (NCC), Network Rail, Highways England

Infrastructure Position Statement and Delivery Plan: Fire Department, the NHS (Strategic Transformation Panel (STP)), Active Norfolk, NCC Children's services (education), NCC Green Infrastructure Team, Norfolk Constabulary, UK Power Networks, EDF Energy, Anglian Water, NCC as the Lead Local Flood Authority, the Environment Agency.

Actions

Preparation of the Local Plan and much of the supporting evidence base has involved extensive engagement and input from the providers of key infrastructure and services required to support the growth in the Local Plan. Where specific infrastructure deficiencies have been identified these are identified in the Infrastructure Delivery Plan and are transposed into policy requirements either in the site-specific policies of the Plan or as generic requirements in Policy HC4, which expressly requires development proposals to be supported by all necessary infrastructure improvements. The costs of such improvements are factored into the district wide viability Assessment. NCC, the local highways authority which produces transport plans for the area, is also a partner in the production of the Local as well as the NSPF. All proposed site allocations have been subject to high level highways assessment to ensure that safe and convenient site access can be provided and that the policies of the Plan ensure that highway impacts are properly considered. None of the proposed sites are subject to strategic highway objections.

Norfolk County Council: Highway Authority, Education, LLFA, M&W, Children Services, Environment, and Historic Environment all contributed to the HELAA and the Site selection process, which assisted in formulating the Site policies.

More recently a consortium including all of the Norfolk Planning Authorities and Anglian Water have launched a not-for-profit Joint Venture to source, and make available, phosphate and nitrate credits (and other environmental credits) to address the impacts arising from the requirements of the Habitat Regulations (Nutrient Neutrality)

Summary of Evidence Base

Infrastructure includes a wide range of facilities and services including schools, medical facilities, community facilities, open space, roads, railways, cycle paths and flood defences.

As part Plan preparation, Norfolk County Council officers on behalf of North Norfolk consulted internally with officers from the Lead Local Flooding Authority section, Children's services (education) and the Green Infrastructure team.

The evidence on infrastructure informs the content of the plan as a whole, most specifically Policy HC4 on infrastructure provision and the individual site allocation policies.

Outcomes set out in the NSPF

Strategic infrastructure to support growth is primarily provided by partners working with North Norfolk on the local plan. The following agreements in the NSPF (2021) cover the strategic infrastructure on which the LPAs can have the most influence on delivery:

Agreement 23 - The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high-speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require highspeed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26 - Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

Outcomes set out in the North Norfolk Local Plan

Policy HC4 Requires the delivery of all supporting infrastructure shown to be necessary to deliver sustainable communities.

Policy CC4 Introduces a requirement for higher water efficiency standards (agreed with all Norfolk planning authorities and Anglian Water).

Policy CC8 requires delivery of electric vehicle charging points.

All site allocation policies identify and require the delivery of critical supporting infrastructure necessary to make development proposals acceptable in land use terms including where applicable off-site road improvements, drainage, school site provision, school place funding, footpaths and any other enabling infrastructure.

Ongoing Cooperation

Ongoing cooperation through the review of the NSPF.

7. Health & Wellbeing

Strategic Planning Issue

Planning and Health: collaboration between local planning authorities, health service organisations and public health agencies to plan health care facilities to serve future growth and to ensure new development promotes healthy and active lifestyles.

Evidence Base

- Planning in Health Protocol Revised (2019) [EL I1 and I2]

Strategic Partners (D to C)

NHS Norfolk and Waveney Clinical Commissioning Group; Norfolk and Norwich University Hospital NHS Foundation Trust; Norfolk Community Health and Care NHS Trust; Norfolk and Suffolk NHS Foundation Trust; East of England Ambulance Service NHS Trust; East Coast Community Healthcare CIC Clinical Commissioning Groups, Health Partners and Public Health Norfolk / Public Health Suffolk Norfolk County Council and all Norfolk Planning Authorities

Actions

Planning in Health Protocol (Revised 2019)

This is an engagement protocol between local planning authorities, the Norfolk and Waveney Sustainability and Transformation Partnership (STP), Clinical Commissioning Groups, Health Partners and Public Health Norfolk and Public Health Suffolk. Its aim is to provide greater coordination between health care providers and planning, enabling long term strategic coordination of the health care facilities required to serve growth and to assist the development of new communities which promote healthy and active lifestyles (see further below).

The engagement protocol for planning and health in Norfolk has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations and public health agencies to plan for future growth and to promote health. It reflects a change in national planning policy and the need for health service organisations to deliver on the commitments within the 5 year forward view. The 2017 version of the protocol has been updated to take into account of the emergence of the NHS Sustainability and Transformation Partnership (STP). The revision also includes updates to include East Suffolk Council which is responsible for the Waveney part of the Great Yarmouth and Waveney CCG and the Norfolk and Waveney STP. The Protocol is subject to on-going review to reflect changes to health care structures.

The Protocol covers both plan making and significant planning applications and has assisted health care professionals to gain a greater understanding of, and input on, where additional facilities will be required to serve growth.

Outcomes set out in the NSPF

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Outcomes set out in the North Norfolk Local Plan

Policy HC1 - Health and Wellbeing includes a requirement for Health Impact Assessments for allocated sites of 500 dwellings and many other aspects of Policy are intended to contribute towards more healthy lifestyles.

Policy HC4 - Infrastructure sets out that North Norfolk, working with the partners in the STP, will seek the timely delivery of the health care infrastructure required to serve growth via necessary contributions.

Ongoing cooperation

Cooperation will be ongoing through future reviews of the NSPF and the Planning in Health Protocol 2021

8. Climate Change: including Flood Risk / Water / Energy Efficiency

Strategic Planning Issue

Tackling the challenges of Climate Change, addressing the challenge of flood risk and coastal erosion, planning for water resources, wastewater management and energy efficiency.

Evidence Base

- North Norfolk Strategic Flood Risk Assessment (Level 1) Nov 2017 [EL.G5 and G6]

Strategic Partners

SFRA Level 1: Environment Agency, Norfolk County Council (the Lead Local Flood authority (LLFA)), The Broads Authority, Anglian Water, Internal Drainage Boards, Broadland District Council, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council South Norfolk Council, All the commissioning authorities; The Lead Local Flood Authority (Norfolk County Council); Environment Agency; Internal Drainage Boards (Downham Market Group of IDBs, East Harling IDB, Middle Level Commissioners, Water Management Alliance, Waveney IDB); Anglian Water; Highways England; and, Planners at the neighbouring authorities and LLFAs.

Summary of Evidence Base

- North Norfolk Area Strategic Flood Risk Assessment (SFRA) Level 1 (2017)

We held a series of meeting with the LPA's, EA, AW and LLFA to scope out the legislative and modelling requirements and agree the climate change allowances that had to be built into the modelling in order to meet the new guidance requirements. These meeting were held in addition and outside the infrastructure group set up by the NSF. There were seven meetings in total May – Oct which led to us agreeing the scope of the SFRA, the modelling requirements to be undertaken and the agreement to work together following a combined approach across Norfolk LPAs (except Breckland who had already undertaken a separate and independent SFRA at the time) . This work was commissioned and project managed by NNDC on behalf of all the LPAs, including the BA but excluding Breckland.

After that a steering group (project management by NNDC) was set up with a core body with representation from NNDC, KLWN, BA, EA. and a wider stakeholder group which included relevant stakeholders below:

LPAs (including Breckland cross boundary impacts only), LLFA, AW, Essex and Suffolk Water, EA, JBA consulting, NCC highways, Cambridgeshire County council (in relation to KLWN) fire and rescue, MMO, Downham Market Group of IDBs, Water Management Alliance Group of IDBs, Ely Group of IDBs, Waveney, Lower Yare and

Lothingland IDB, East Harling IDB, Babergh and Mid Suffolk DC, Waveney DC, Fenland DC

This led to the production of a suite of SFRA's across Norfolk towards the end of 2017 with an update early 2018 which incorporated the delayed coastal modelling around the wash.

A consortium of Norfolk LPAs commissioned a Level 1 SFRA to inform strategic planning decisions, the preparation of local plans and to inform development management decisions. Its main output is mapping identifying areas at risk of flood including an allowance for climate change. SFRA's form part of the evidence base of local plans and inform Sustainability Appraisal. The report was produced by JBA Consulting and contains the follow up Level 2 SFRA report.

Outcome set out in the NSPF 2021

NSPF Agreement 3 (relevant section) - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To reduce Norfolk's **greenhouse gas emissions** and improving air quality as well as reducing the impact from, exposure to, and effects of climate change.

Agreement 19 - Local Planning Authorities in Norfolk agree that **climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans.**

To do this, Local Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against Norfolk Strategic Planning Framework Page 4 local factors including viability of developments. Local Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 20 - Norfolk Local Planning Authorities agree to work together to investigate the production of a **county wide climate change best practice guide/design guide** and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.

Agreement 21 - Norfolk Authorities have agreed to become members of Water Resources East (WRE), and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 - Norfolk is identified as an area of serious **water stress**; the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 - The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed **utility projects** to ensure that development is aligned with **water and wastewater infrastructure**.

Flood Risk - although there is not a specific flood risk agreement, section 9.9 of the NSPF covers the issue and states “To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk including the opportunities not only for mitigation but also adaptation”. It points to the importance of flood risk assessments being used to ensure development is located away from areas of flood risk wherever possible. It also identifies the importance of high-quality urban design, natural flood risk management including green infrastructure and Sustainable Drainage Systems (SUDs) as part of an integrated approach to water management with water re-use measures forming part of the overall design of developments.

Outcome set out in the North Norfolk Local Plan

The Plan contains policies which cover all relevant aspects of the NSPF agreements for how local plans in the county should address the strategic issue of climate change. The policies of the Plan cover a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, resource efficiency, the minimisation of pollution, and green infrastructure delivery.

More specifically -

Water

Policy CC4 addresses water efficiency requiring developments to achieve the higher optional standard of the Building Regs of 110 litres per day per person. The protection of water quality is addressed in **Policy CC13** and a proposed modification to the Plan to address the legal requirements of the Habitat Regulations in relation to Nutrient Neutrality.

Flood Risk

The Local Plan locates development away from areas at risk of flood and promotes development which supports more natural functioning of the water environment.

In accordance with **Policy CC7**, development must mitigate flood risk.

Energy Efficiency

Policy CC2 supports the supply of renewable and low carbon energy. **Policy CC3** requires Energy Efficient Construction in both residential and commercial proposals. **Policy CC8** requires the delivery of electric vehicle charging points within development.

Coastal Adaptation

Policies CC5 and CC6 ensure that new development is limited in areas identified as potentially subject to coastal erosion and a supportive policy context for the relocation of developments already at risk

The Strategic Location of Growth

The great majority of growth in the North Norfolk Local Plan is located in and on the edge of the main towns and larger villages in the District. A limited amount of growth is located in the on the edge of other villages to help to retain their services, reducing the need for residents to travel to access those services (**Policy HOU1**).

Ongoing cooperation

Cooperation will be ongoing through the review of the NSPF.

9. Natural Environment

Strategic Planning Issue

Conservation and enhancement of the natural environment including biodiversity.

Evidence Base

- North Norfolk Habitat Regulations Assessment (HRA) December 2021 [EL A4]
- Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy GIRAMS [EL G9]

Strategic Partners D to C

- SA Report: Natural England and the Environment Agency.
- HRA/ GI Study/ GIRAMS: Natural England, Environment Agency, Norfolk County Council Environment Team
- NSPF: the MMO has recently been a signatory body (2021)

Summary of Evidence Base

The **Habitat Regulations Assessment (HRA)** was prepared by Footprint Ecology. This has been an ongoing and iterative process which has consisted of:

- a) A draft scoping report that reviewed existing evidence and started to draw together available evidence relating to potential impacts on European sites and possible opportunities to prevent those impacts from occurring, which was completed in May 2017. The purpose being to scope out and inform the identification of policy options and alternatives as well as the identification and appraisal of site-specific options in the emerging plan;
- b) An Interim HRA was completed which provided the initial screening of the emerging policies and site allocations based on the First Draft Local Plan stage (Regulation 18) and which in particular, identified likely significant effects for a range of European sites, in relation to urban effects, recreation pressure and hydrological issues, which were taken to appropriate assessment;
- c) Following appropriate assessment, the Submission Version of the HRA concluded that the proposed submission version of North Norfolk Local Plan (Regulation 19) is in conformity with the Habitats Regulations and at a plan level a conclusion of no adverse effects, alone or in-combination, on European site integrity, was drawn.

The preparation of the HRA has involved ongoing work and cooperation with key partners including Natural England and the Environment Agency.

Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) is a county wide document that has been jointly produced. The output includes:

- a review of strategically significant opportunities for the provision of new and enhanced Green Infrastructure;

- the current management measures for visitors to the European sites and evidence for recreational disturbance “hotspots” or particular concerns with locations proposed for housing growth;
- developing the mitigation necessary to avoid the significant adverse effects from “in-combination” impacts from residential development and the identification of a detailed programme of strategic mitigation measures, which is to be funded by developer contributions from residential development.

The study proposes a tariff-based payment that will be used to fund a package of avoidance and mitigation measures to be delivered at Habitat Sites.

The GIRAMS measures are considered to be sufficient for the submission version of the HRA assessment to draw the conclusion at a plan level that no adverse effect upon the integrity of any European site from either alone or in-combination effects. As this has implications outside the North Norfolk boundary and in the wider area, this study has been part of the NSPF update (see agreement 28 below).

Policies CC11, HC4 and ENV5 of the North Norfolk Local Plan incorporate requirements, including a tariff that has been implemented, to address these issues.

This project has involved other external partners including Natural England and the Environment Agency under the duty to cooperate.

NSPF 2021 coverage

NSPF Agreement 23 - The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

The MMO recently became a signatory in the NSPF:

Agreement 28 - In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;
- b) the pressure that development in Norfolk could place on these assets; and
- c) the importance of ecological connections between habitats

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

North Norfolk Local Plan coverage

Reflecting the agreements in the NSPF, identified measures in the GIRAMS and the content of the NPPF and legislation, the North Norfolk Local Plan seeks to protect, conserve and enhance

the natural environment in a significant number of ways, which collectively, ensure the full consideration of the district's landscape, biodiversity and geodiversity.

More specifically:

Policies ENV1, ENV2 and ENV3 ensure that the appropriate level of protection is given to nationally and locally designated landscapes and settings, such as the Norfolk Coast AONB, The Broads, the Heritage Coast and Undeveloped Coast, as well as the district's rural and coastal landscape character. **Policy CC12** seeks the protection, retention and incorporation of existing and new trees, hedgerows, woodland and other natural features within development proposals.

Policy CC11 seeks to conserve and enhance existing and new green infrastructure provision to improve connectivity and access, while **Policy ENV4** seeks the protection and enhancement of the districts biodiversity and geodiversity, where **Policy CC10** specifically requires that biodiversity net gain is achieved through development proposals and **Policy ENV5** ensures compliance with the Conservation of Habitats Regulations 2017 and requires contributions towards a scheme of avoidance and mitigation measures in accordance with the Norfolk GIRAMS. **Policy HC4** requires for the strategic delivery of environmental infrastructure, including all types of open space, enhanced green infrastructure and biodiversity net gain and well as contributions towards visitor impact mitigation on European sites.

Ongoing cooperation

Cooperation will be ongoing through the review of the NSPF and Local Plan.

10. Built Environment

Strategic Planning Issue

Conservation and enhancement of the historic environment including mitigation and adaptation through policy development.

Evidence Base

- Background Paper 10 - Heritage Impact Assessments [EL C10 and C10.1]

Strategic Partners D to C

- HIA - Historic England

Actions

North Norfolk has collaborated with Historic England in the preparation of Local Plan policies relating to built heritage and the preparation of Historic Impact Assessments for each of the proposed allocations. The process is described in detail in Background Paper 10 - Heritage Impact Assessments. As a result of their comments the Site Allocations Policies and strategic policies were reconsidered and subsequent changes to policies were made.

Local Plan Coverage

Reflecting the content of the NPPF and legislation, the Local Plan seeks to protect and enhance the built and historic environment in a number of ways. This includes the vision which says North Norfolk will protect and enhance the quality of the built environment

More specifically,

Policy ENV8 requires high quality design in all new development and **Policy ENV7** seeks to protect and enhance the historic environment and compliance with the statutory tests.

Furthermore, sites allocated in the plan are required to protect and enhance the local built and historic environment.

11. Natural Environment

The SA of the Plan has involved co-operation with key D to C prescribed bodies, Historic England, the Environment Agency and Natural England at all stages of the development of the plan and its accompanying SA. This has involved:

Firstly, to identify the scope and level of detail of the information to be included in the SA, a Scoping SA Report was produced in Nov 2015 following consultation with Historic England, Natural England and the Environment Agency.

Subsequently, Interim SA Reports of the policy alternatives within the Local Plan were produced and consulted on. A SA Report for Options was published, and a further iteration supported the consultation on the Preferred Options and Reasonable alternatives. Most recently, a SA Report for the Reg.19 Plan was published Jan 2022 [EL A3]

Ongoing cooperation

This engagement with the 3 key bodies through SA has assisted in addressing cross boundary strategic issues. Ongoing cooperation through the review of the Local Plan and the planning application process.

12. Minerals & Waste

Norfolk County Council is the Minerals and Waste local authority. A local plan review is being prepared to consolidate its three current adopted plans into one and to extend its plan period to 2036. The North Norfolk Local Plan therefore does not cover minerals and waste issues. North Norfolk District Council has consulted the county minerals and waste officers and their comments have informed the Site Policies and where relevant Minerals and Waste local plan policies have been cross referenced. In addition, the NSPF Update (2021) - **Agreement 29** addresses issues related to this plan in more detail. Where applicable the site allocation policies of the North Norfolk Local Plan require compliance with the Minerals and Waste Local Plan safeguarding policy (work minerals where practical as part of the site development process)

13. Overall Conclusions

North Norfolk District Council is satisfied it has worked effectively and on an on-going basis in relation to matters of strategic significance which impact on more than one administrative area.

The establishment of the Norfolk Strategic forum in 2015 has proved to be an effective mechanism for identifying and addressing significant cross boundary issues. This has culminated in significant areas of joint working, shared approaches, consistent and complimentary policy development and tangible benefits to the member authorities in terms of efficiencies, improved planning outcomes and the effectiveness of the plan making process in the County. The requirements of the Duty to co-operate have been effectively discharged throughout the preparation of the North Norfolk Local Plan.