



Mrs Annette Feeney
Local Plan Programme Officer
North Norfolk District Council
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Date: 05 January 2024

Dear Mrs Feeney

North Norfolk Local Plan Examination

Environment Agency Written Statement (Matter 2) - Spatial Strategy (SS Policies)

Thank you for the opportunity to contribute to the North Norfolk Local Plan Examination process. We expressed an interest in being heard through the examination and hearings. Following review of the Inspector's Matters, Issues, and Questions, we are providing the following written statement. We also take the opportunity to note that we do not consider it necessary to attend the hearings, as our concerns can be satisfactorily considered through written evaluation alongside our previous Regulation 19 representation to the Plan.

Environment Agency Response to List of Matters, Issues and Questions

Matter 2: Spatial Strategy (SS policies)

Small Growth Villages

2.9

In the Small Growth Villages, what is the justification for an 'allowance' of 6% growth in dwellings as opposed to a different figure? Is it justified for this figure to be cap on development, to include infill development, and to operate a 'first come first served' approach as set out in Appendix 4? Given the possible uncertainty, how reliable are the 452 dwellings planned to come forward under this policy?

We would note that the submission version of the plan in paragraph 4.1.9 explains "A number of the settlements are constrained by environmental factors, as such the figures in Table 2 'Small Growth Villages Housing Apportionment' are presented as an allowance rather than a specific target to be delivered.". As a result of this distinction, we have taken a slightly more conservative approach to our position, that

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that which would have been if the growth for Horning would have been deemed a target allocation. That being said, the complex water quality constraints faced in the Horning catchment, mean that there is still likely to be significant challenges to any potential planning applications that may come forward. We would raise concerns as to the reliability for which the 31 dwellings 'allowance' may be delivered. The Joint Position Statement between North Norfolk District Council, The Broads Authority, and the Environment Agency, clearly sets out the challenges for growth in the Horning area.

2.11

Are there any village specific issues, eg scale or location of growth or detailed definition of settlement boundaries:

j) Horning

Furthermore, as outlined above, we have concerns as to the suitability of Horning as an existing settlement to accommodate further growth. This formed the basis of our unsound representation to the submission version of the Plan, representation reference LPS500. Our comments sought to address the lack of explicit reference to the uniquely complex water quality constraints faced in Horning, and associated lack of reference in the Plan to the Joint Position Statement for Horning.

We would acknowledge the text in paragraph 4.1.9 of the Plan "*They do however have the level of service and facility provision to meet the classification and appropriate growth could be delivered should suitable development proposals come forward.*" and recognise that Horning does have a range of services and facilities that may give reason to suggest the suitability of growth appropriate to its scale and function. However, as set out in paragraphs 158-159 and 180 of the Updated National Planning Policy Framework 2023, plans and policies should take into account the long-term implications for flood risk and should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. Policies and decisions should contribute to and enhance the natural and local environment by: NPPF 180 e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans. And Water Framework Directive, as transposed into English Law 2017, requirements set out the need to ensure no deterioration of waterbody status. Growth coming forward in an area where constraints are unsustainable has the potential to risk achieving these objectives and environmental requirements.

Whilst, allocation or allowance of growth incorporated into strategic plans and policies, as in the case of Horning is not considered to be appropriate for the reasons stated above, it could be argued that some infill development or new development could be satisfactorily evidenced at application stages providing alternate strategies be evidenced and submitted. However, it does not seem appropriate to encourage this through the Plan, by affording an allowance of growth in the Horning area, given the current sensitive constraints and long-term standing difficulties resolving them. We would recommend that Horning be categorised as per footnote point 4 of Table 2 Small Growth Villages Housing Apportionment (PMIN/4.1/01 and PMIN/4.1/03) set out in Appendix A of the proposed additional minor modifications document. We

would conclude Horning has the potential service and facilities to be considered an infill village, but the settlement is environmentally constrained, and no growth should be relied upon. Individual proposals that may then independently come forward through the Plan period would be assessed accordingly against the Plan and Policies through the decision-making process stages of Development Management.

The proposed minor modifications [A5.11 Schedule of Proposed Additional Minor Modifications] in response to the comments raised by the Environment Agency LPS500 [PMIN/4.1/03 & PMIN/4.1/04] are welcomed. It should be noted that the Horning Knackers Wood Water Recycling Centre Joint Position Statement, has been updated since our previous representation, and so links to the latest version should be amended.

In conclusion, we would be satisfied to remove our unsound representation, providing the minor modification text be included as proposed, and that Horning be removed from any explicit allowance for growth, instead be recognised as a 'Constrained Small Growth Village'.

We trust that this advice is useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Abigail', with a long horizontal line extending to the right.

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