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North Norfolk District Council's response to Inspector's Matters, Issues & Questions (2.1 to 2.13) in relation to:

Matter 2: Spatial Strategy (SS policies)

Issue: Whether the spatial strategy of the plan is positively prepared, justified, effective and consistent with national policy as a suitable basis for planning the development of the district.

References in square bold brackets **[xx]** refer to Examination Library document numbers, their page and/or paragraph. The Examination Library can be accessed at:

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Introduction

This document is North Norfolk District Council's response to the Matters, Issues and Questions identified for examination by Inspector David Reed of the Planning Inspectorate, as published on 3 November 2023 [EH002]. This is one of eleven separate response papers produced to address the specific matter and issue as identified on the front page.

Each response paper includes a number of references to specific evidence which has been relied upon in answering the matters, issues and questions. These reference numbers relate directly to the Examination Library website, where all evidence is published:

www.north-norfolk.gov.uk/localplanexamination

References to 'modifications' relate to such modifications requested by the Planning Authority in Schedules 4 and 5 submitted alongside the Plan [A5.11 and A5.12]. For ease of reference, where these requested modifications relate to the Councils response to each question, details have been included in this response.

Response to Inspector's questions

2.1 Is the proposed settlement hierarchy with five categories - Large Growth Towns, Small Growth Towns, Large Growth Villages, Small Growth Villages and Countryside - justified by the evidence?

2.1.1 Yes, the Authority has justified the five tiers of the settlement hierarchy. Each of the proposed tiers has been carefully considered to ensure that it is justified and will be effective. The key purpose of the hierarchy is to distribute the required growth across the district and ensure that the resulting patterns of development are sustainable.

2.1.2 The settlement hierarchy determines the broad distribution of growth in the district but not the precise quantum of development in individual settlements. To ensure a sustainable distribution the Authority has developed a locally specific methodology which considers the economic, environmental, and social dimensions of sustainability. Within each of these broad dimensions the authority has assessed individual settlements against a range of criteria which can be broadly grouped as service and infrastructure availability (functional sustainability), environmental constraint, and need for development. The settlement hierarchy logically groups settlements together in each of the tiers, with each tier including only settlements which perform in similar ways when assessed against the criteria.

2.1.3 By following this methodology, which draws on the Sustainability Appraisal, a consistent approach is taken which ensures those places with the broadest range of services, which are less environmentally constrained, and which have higher levels of need, are higher up the hierarchy and are consequently proposed for greater proportions of the required growth.

2.1.4 Whilst it is to be expected that there would be some correlation between size and relative sustainability, the terms 'Large' and 'Small' are descriptive of the scale of growth proposed in each tier and the size of a settlement in terms of either population or number of dwellings is not itself a factor which determines the position in the hierarchy. Growth is consequently distributed in a sustainable way rather than

a simple apportionment of the requirement on the basis of the size or existing population of a place.

- 2.1.5 The approach and the results of the methodology are explained in greater detail in Background Paper 2 - Distribution of Growth [C02].
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**2.2 How does the settlement hierarchy compare to that in the 2008 Core Strategy?
How are the proposed changes justified or explained?**

- 2.2.1 In developing the proposed Settlement Hierarchy, the Authority has taken the approach of starting with a blank sheet of paper rather than following, or modifying, the existing adopted hierarchy. Comparison with the existing hierarchy, which was prepared many years ago and was informed by a requirement to comply with the, now abolished, Regional Spatial Strategy for the East of England, would not take account of changes since that time (both regulatory and real world) and would not be evidence based.
- 2.2.2 As outlined in the response to Question 2.1 above, the Authority has undertaken a comprehensive review of the relative sustainability of all settlements in the district in order to understand their suitability to accommodate the required growth. Given that many of the measures of sustainability and the fundamental characteristics of settlements are unchanged since preparation of the Core Strategy the results of the process are broadly similar, but not identical, to the currently adopted hierarchy.
- 2.2.3 The two-tier categorization of towns remains as in the Core Strategy, with the exception of Holt which is currently grouped with North Walsham, Cromer, and Fakenham in the adopted Core Strategy as one of four Principle (Large Growth) Towns. It's recategorisation as a Small Growth Town follows the settlement review supporting the new Local Plan and reflects up to date evidence including its comparatively poorer levels of services (no public secondary school, narrower choice of shopping, and stronger visitor destination rather than service centre roll), together with the high degree of environmental constraint resulting from its location within the North Norfolk Coast Area of Outstanding Natural Beauty and the Glaven Valley Conservation Area. It is nevertheless proposed to accommodate higher levels of growth than the three other proposed Small Growth Towns.
- 2.2.4 In the adopted Core Strategy, there is a single tier of 'growth' village called Service Villages. Whilst each of these include services, this category includes a diverse range of places with at one end of the scale settlements such as Mundesley and Briston and Melton Constable which have small convenience stores, doctors, primary school, range of business and other community facilities and hence perform a relatively strong service role, too much smaller villages at the other end of the scale such as Weybourne, Aldborough and Catfield where services are far more limited. The new Local Plan reflects this distinction in its proposed two tiers of villages now proposed, and the distinct role that each tier plays in addressing needs.
- 2.2.5 Full details of the approach taken are in Background Paper 2 - Distribution of Growth [C2].

2.3 Does the evidence justify the inclusion of the particular settlements in each of the top three tiers – Large Growth Towns, Small Growth Towns and Large Growth Villages? Is the distinction between Large Growth Villages and Small Growth Villages distinct or have any been misclassified?

- 2.3.1 All Selected Growth Settlements comply with the qualifying criteria of the methodology and were reviewed following the completion of Regulation 19 consultation. This reaffirmed their classification as well as the exclusion of a small number of settlements which respondents argued should be included as Small Growth Villages.
- 2.3.2 The distinction between Large and Small Growth Villages is clear. Large Growth Villages not only have all of the three key services (school, convenience shopping, and doctors' surgery) but also include to varying degrees a good range of other services and facilities. They perform a limited, but important service role for residents from elsewhere in the area.
- 2.3.3 The distinction made between Large and Small Growth Villages is important for two reasons. Firstly, large villages are different in that they have more services, perform a stronger service role for their residence and other villages nearby and secondly their position in the hierarchy determines the policy approach for delivery of growth. In Large Growth Villages the Plan allocates specific sites, allows for in boundary infill, changes of use and exceptions development whilst in Small Growth Villages the amount of Growth is expressed as an 'allowance' for growth with that allowance set at a 6% addition to the housing stock following Plan adoption.
- 2.3.4 The Council considers that there is sufficient distinction between each of the tiers in the proposed hierarchy. It is the result of a comprehensive assessment of the relative sustainability of each place. It is acknowledged that at the margins of each tier the difference between places will inevitably be small. This serves to reinforce the need for a clear objective selection process which is applied equitably across the district.

2.4 How has the proportion of new development in Large Growth Towns (about 50% of the total) been derived? Is this a 'top down' policy decision or the consequence of assessing site opportunities? How have the lower proportions of development in Small Growth Towns and Large Growth Villages been derived, and do these proportions suitably reflect the relative sustainability of the settlements?

- 2.4.1 The proportion of new development in Large Growth Towns, and other growth settlements is the result of a comprehensive assessment of each settlements relative sustainability taking account of multiple factors including functional sustainability (services, facilities, and infrastructure availability), environmental constraint and the need for various types of development as identified in the evidence. Site availability and suitability was a consideration but not the principle determining factor. The process is explained in detail in Background Paper 2 - Distribution of Growth [C2].
- 2.4.2 The approach ensures that the relative sustainability of each separate place has been

considered when determining how much growth it will accommodate. Hence whilst Cromer is categorized as a Large Growth Town, reflecting its functional sustainability and high levels of need, the quantum of growth proposed in the town is significantly less than the other Large Growth Towns (Fakenham and North Walsham) reflecting the high degree of environmental constraint resulting from the towns location on the coast and the surrounding quality of the landscape which is largely designated as AONB. Similarly, levels of growth proposed in Cromer are higher than that proposed in the Small Growth Towns.

- 2.4.3 A settlements position in the proposed hierarchy was therefore determined by its specific characteristics rather than simply being a function of site availability or a distribution of the required growth in a proportionate way based on the existing size of a place.
- 2.4.4 The distinction made between Large and Small Growth Villages is important for two reasons. Firstly, large villages are different in that they have more services, perform a stronger service role for their residence and other villages nearby and secondly their position in the hierarchy determines the policy approach for delivery of growth. In Large Growth Villages the Plan allocates specific sites, allows for in boundary infill, changes of use and exceptions development whilst in Small Growth Villages the amount of Growth is expressed as an 'allowance' for growth with that allowance set at a 6% addition to the housing stock following Plan adoption.
- 2.4.5 The actual quantity of development proposed is a result of consideration of many factors including:
- The total amount of development required in the district.
 - An assessment of relative sustainability of each place.
 - A consideration of availability and suitability of potential sites including assessment of a wide range of options.
 - The requirements of national policy.

2.5 What criteria have been used to define settlement boundaries, and have these been consistently applied? (Any site-specific issues will be dealt with settlement by settlement).

- 2.5.1 A settlement boundary review was undertaken, and topic paper produced, for each of the proposed 23 Small Growth Villages in the submitted Local Plan to ensure that the boundaries, many of which were entirely new or based on the former boundaries of historic local plans, were drawn against consistent criterion. The criteria to define settlement boundaries in Small Growth Villages is set out in the Settlement Boundary Review: Small Growth Villages Background Paper [C11].
- 2.5.2 A similar desktop review was carried out in relation to the proposed Large Growth Towns, Small Growth Towns and Large Growth Villages. Boundaries were re-aligned where necessary to reflect the built form of the settlement based on an up-to-date ordnance survey base map (Mastermap). This sense-check also aligned and updated boundaries to incorporate policy area

designations where necessary, existing site allocations, and proposed site allocations in the submitted Local Plan.

Small Growth Villages

2.6 Does the evidence justify the inclusion of the villages in the Small Growth Village category? How does the list compare with the designated service villages in the 2008 Core Strategy, and how are any changes justified or explained?

- 2.6.1 Yes, the evidence set out in Background Paper 2 Distribution of Growth [C2] justifies the inclusion of the identified villages in the Small Growth Village category.
- 2.6.2 Background Paper [C2] clearly sets out the framework for the distribution of growth, in terms of location and quantity of growth by considering a range of environmental, social and economic sustainability factors. The spatial strategy aims to deliver a range of objectives including the key objective of locating development so as to reduce carbon emissions and to mitigate and adapt to future climate change, as well as more functional objectives such as encouraging a choice of sustainable travel modes and thus reducing the need to travel for basic services especially by car (see Policy CC1 Delivering Climate Resilient Sustainable Growth). The framework is informed by national policy and guidance as described in Chapter 3 of the Background Paper [C2], and in terms of the Small Growth Villages tier, takes its direction from paragraph 79 NPPF 2023, which includes that *'planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'*
- 2.6.3 The methodology detailed in Chapter 4 of the Background Paper [C2] is locally derived, transparent, and as objective as possible, having five stages of assessment. Being driven firstly by the importance of functional sustainability, Stage 1 of the methodology identifies core services and facilities that are considered functionally important to promote thriving and sustainable communities. For the Small Growth Villages tier there are certain services that the Council concluded to be more critical than others in contributing towards sustainable communities, as detailed in paragraph 4.4, page 6, of the Background Paper [C2]. This required the presence of a combination of one identified Key Service (Primary School, convenience shopping or GP Surgery), and at least 4 identified Secondary or Desirable Services.
- 2.6.4 Stages 2 and 3 sifted the identified settlements in accordance with the services and facilities criteria and then at Stage 4, considered the impacts of environmental and infrastructure constraints on the potential for growth, using a range of supporting evidence including the North Norfolk Strategic Flood Risk Assessment 2017 [G5]. Stage 5 assessed the level of housing need and the availability of sites, where the former was identified through the Council's Housing Waiting List and the latter was considered by the number of sites associated with each settlement that were put forward through the Council's Housing & Economic Land Availability Assessment Part 1 2017 (HELAA) [D14]. The details for each of these matters for Small Growth Village can be found in Chapter 9 of Background Paper 2 [C2].
- 2.6.5 Background Paper 2 [C2] also incorporates an updated version of the Village

Assessment and Settlement Profiles Topic Paper [C2.2] at Appendix 3, which provides key service and demographic information for the settlements, including Small Growth Villages. This evidence was used to directly inform the level of growth apportioned to the Small Growth Village tier of the settlement hierarchy.

- 2.6.6 The methodology for settlement selection has been consistently applied at the relevant stages of the local plan preparation and a review (at post Regulation 18 stage) using the methodology and taking account of consultation feedback, produced the list of 23 Small Growth Villages in Policy SS 1 of the First Draft Local Plan (Part 1) [B5]. This compares to a total of 16 settlements identified as either Service Villages or Coastal Service Villages being the lowest tier within the existing Policy SS 1 Settlement Hierarchy of the Adopted Core Strategy [J1]. The methodology used to identify the Service Villages and Coastal Service Villages is considered out of date today, having been formulated a considerable number of years ago using the definition of a Key Service Centre as described in the East of England Plan, which has subsequently been revoked.
- 2.6.7 The villages of Blakeney, Briston & Melton Constable, Ludham and Mundesley, are currently identified as Service or Coastal Service Villages within Policy SS 1 of the Adopted Core Strategy [J1] and have been identified as Large Growth Villages in Policy SS 1 of the Local Plan Submission Version [A1], having all of the Key Services identified in the methodology alongside a range of Secondary and Desirable Services. This elevated their functional status over the other identified villages, particularly as their services are also seen to support adjacent catchment areas.
- 2.6.8 The 12 settlements of Aldborough, Bacton, Catfield, Corpusty & Saxthorpe, Happisburgh, Horning, Little Snoring, Walsingham, Overstrand, Roughton, Southrepps and Weybourne are currently identified as Service and Coastal Service Villages in Policy SS 1 of the Adopted Core Strategy [J1] and are also identified as Small Growth Villages in the Local Plan [A1], as justified in Chapter 9 of Background Paper 2 [C2], in providing an identified level of local day to day services.
- 2.6.9 The 11 settlements of Badersfield (Scottow), Binham, East Runton, High Kelling, Potter Heigham, Sculthorpe, Sea Palling, Sutton, Trunch, Walcott and West Runton fall within the Countryside Policy Area as described in Policy SS 1 of the Adopted Core Strategy [J1] and are identified as Small Growth Villages in Policy SS 1 of the Local Plan [A1] having met the criteria requirements of the methodology, in providing an identified level of local day to day services, as detailed in the settlement assessments in Chapter 9 of Background Paper 2 [C2].
- 2.6.10 Overall, the up-to-date methodology and supporting evidence provides a robust base to justify the level of proposed growth within the settlement hierarchy, including the identified Small Growth Villages and on which to inform the distribution of development set out in Policies SS1 and HOU1 of the Local Plan Submission Version [A1].

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- 2.7 Should any further villages be included in the Small Growth Villages list due to their size, their suitability for minor development, to support existing services or for consistency? e.g. Langham, Edgefield, Beeston Regis**

- 2.7.1 No further villages should be included in the Small Growth Village list. As outlined in the response to Question 2.6 above, the 23 settlements identified as Small Growth Villages within Policy SS 1 of the Local Plan Submission Version [A1] have been selected through the consistent application of the locally derived methodology as detailed in Background Paper 2 Distribution of Growth [C2], that takes into account a broad range of economic, social and environmental factors. It is important for the Local Plan to have a strategic and consistent approach in order that decisions are made and justified by an established methodology. The size of a settlement, in terms of population or number of dwellings would not, in itself, provide a sustainable approach to the suitability of a settlement for small scale growth, as there are a number of villages in North Norfolk that have a comparably large population supported by only a limited range of services and little to no public transport, where their growth could not be considered to provide an appropriate climate resilient sustainable form of development.
- 2.7.2 In response to the settlements mentioned, the village of Edgefield did not meet the Background Paper 2 [C2] methodology requirements of Stages 1 (Defining Important Services) and 2 (Initial Sift – requiring either a school or a convenience shop), while the village of Beeston Regis did not meet the requirements of Stage 3 (Second Sift - 1 key service and at least 4 secondary or desirable services as defined) and are identified as being within the Countryside.
- 2.7.3 The village of Langham was identified as a Small Growth Village at the Regulation 18 stage, within Policy SD 3, Settlement Hierarchy of the North Norfolk First Draft Local Plan (Part 1) [B5]. However, the post Regulation 18 review of the Small Growth Villages, which took account of consultation feedback, revealed that Langham did not have a shop or a post office (see paragraph 5.6 and assessment in Chapter 9, pages 142-146) and consequently, the village fell below the required number and defined type of day to day services to be identified as a Small Growth Village as detailed in the methodology for settlement selection (Chapter 4 of the Background Paper). A minor modification has been tabled to remove the spatial identification of Langham as a Small Growth Village on Figures 3, 5, 6, 7, 8, 9, 10 and 11 of the Local Plan Submission Version [A1] reference PMIN/4.1/02 (see table below), to update information on the Plan.
- 2.7.4 While it is acknowledged that there will be some villages that only just meet the service requirements or only just fail to meet them, the Authority has reached its conclusions for the settlement hierarchy in relation to the overarching objective to deliver climate resilient sustainable growth, as detailed in Policy CC 1 Climate Resilient Sustainable Growth. It is also important to note that the exclusion of settlements from the Small Growth Villages classification does not prevent such settlements from development growth as detailed in Policies SS 2 Development in the Countryside, SS 3 Community-Led Development, HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing) HOU 4 Essential Rural Worker Accommodation and HOU 5 Gypsy, Traveller & Travelling Showpeople's Accommodation of the Local Plan [A1].

Relevant Proposed Modification

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications [A5.11]. The Table below details the relevant modification in relation to the response above.

PMIN/4.1/02	Amend Figures 3, 5, 6, 7, 8, 9, 10 and 11 to remove the spatial reference to the village of Langham from being identified as a Small Growth Village. To update information in the Plan.
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2.8 For effectiveness, should sites for development be allocated on the edge of Small Growth Villages, or settlement boundaries expanded, rather than inviting individual applications without further policy guidance?

- 2.8.1 No further changes are needed nor justified, the proposed policy approach to the settlement hierarchy is effective and is designed to address all growth needs in the district in a sustainable way.
- 2.8.2 In the adopted Core Strategy [J1] and Site Allocations DPD [J2] the Authority took the approach of allocating specific sites in the Service Village tier of the settlement hierarchy. These allocations were available, suitable, and deliverable at the time of allocation where 25 sites were allocated with a combined capacity to deliver approximately 424 dwellings. Of these 25 sites, 14 remain undeveloped twelve years following their allocation, with the capacity to deliver 238 dwellings. Although each of these sites was subject to rigorous assessment at the time, the evidence clearly indicates that allocation, in of itself, may not secure delivery for often small sites in villages.
- 2.8.3 The Small Growth Village policy approach put forward in the Submission Plan does not allocate sites, and as such, allows more flexibility by providing greater opportunity for a selection of sites to come forward for a quantum allowance of growth. The competitive first come first served principle in the policy would incentivise delivery with growth capped at the proposed 6% limit. The allocation of sites on the edge of the identified Small Growth Villages is likely to be less effective, as it would restrict the potential for future small-scale development to one or two allocated sites. Given that no competitive element would exist there would be little incentive to develop a site in the short to medium term and consequently, such an approach may provide no certainty or effectiveness to bring forward development.
- 2.8.4 Each Small Growth Village has a settlement boundary, which has been reviewed through the Local Plan process, the details of which can be found in Background Paper 11 Settlement Boundary Review (Small Growth Villages) [C11]. The purpose of a settlement boundary in this context is to provide a policy tool that establishes and respects the form and character of each individual settlement. Policy SS1 requires growth in this tier of settlement to comply with a range of criteria designed to ensure that the location, scale, and form of development respects local character, provides for safe access, addresses the need for supporting infrastructure, and gives appropriate priority to the delivery of affordable homes on larger sites. Compliance with other policies in the Plan would also be required.
- 2.8.5 The call for sites process, and the representations made by site owners, are evidence of a strong desire to bring forward sites for development in this tier of settlements and the Council is aware of owners/promoters preparing schemes to ensure they are able to take advantage of the applicable village allowances. The Council considers

the proposed approach to be sound and effective.

- 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?**
- 2.9.1 The approach to provide an Indicative Housing Allowance of 6% growth in the identified Small Growth Villages is justified by a number of factors set out below and as detailed in Chapter 6 of the Background Paper 2 Distribution of Growth [C2].
- 2.9.2 The rationale for the allowance of a total of 452 dwellings to be delivered in the Small Growth Villages is justified by a number of factors including the position of the tier in the settlement hierarchy (informed by the methodology) and the alternative settlement hierarchy policy options assessed in the Sustainability Appraisal Report [A3] (see Appendix D pages 320-328), which indicate that such villages should only accommodate proportionate small-scale growth. The 6% cap on the amount of development is justified in that it reflects the lowest position of Small Growth Villages within the overall settlement hierarchy as set out in Policy SS 1 of the Local Plan [A1]. The cap ensures that the level of development would not exceed higher order settlements within the hierarchy, but nevertheless, would collectively make a useful contribution towards the delivery of smaller scale development sites (less than 1 hectare) as anticipated in paragraphs 69(a) and 79 of the NPPF 2023.
- 2.9.3 The 6% Indicative Housing Allowance approach is based on a fair and equitable apportionment across the identified Small Growth Villages. It ensures that each village only accommodates a proportionate level of growth, with that proportion based on the size of the settlement, and the result in each being less growth than higher order settlements.
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2.10 Are the criteria for development outside defined settlement boundaries in section 3 of Policy SS1 justified and would they be effective? Is the requirement for proposals to incorporate substantial community benefits justified and for sites in excess of 0.25 ha to be offered to registered social landlords first?

- 2.10.1 Yes, the criteria set out in section 3 of Policy SS 1 for development outside the defined settlement boundaries of the Small Growth Villages are justified and would be effective in creating sustainable forms of development. Development proposals would also need to comply with other applicable policies in the Plan.
- 2.10.2 In order to accord with and complement other policies within the Plan, for example, policies ENV 7 Protecting & Enhancing the Historic Environment and ENV 8 High Quality Design, the first four criteria (points a-d) require that any small scale development brought forward through the policy would need to be physically well related to the existing settlement, is proportionate in scale by being capped through

a 6% indicative housing allowance, and where matters of siting, scale and design will need to take account of any impact on the natural and built environment, including historic character and heritage assets.

- 2.10.3 In relation to the fifth criterion 3(e) of Policy SS 1, the Council’s corporate priorities within the North Norfolk District Council Corporate Plan 2023-2027 **[EX011]** seek to place the environment and its communities at its centre, in developing and enhancing both across the district. The Council recognises that in terms of planning policy, community benefits, including infrastructure, can only require what is reasonable and necessary. Consequently, a proposed minor modification has been submitted to Policy SS 1 Criterion 3e, reference PMIN/SS1/01 in Schedule 4 Proposed Additional Minor Modifications **[A5.11]**, to replace the word ‘substantial’ with ‘proportionate’, in order to better reflect this.
- 2.10.4 The final criterion (f) regarding the requirement for sites over 0.25 hectares (and any adjacent developable land) to be firstly offered to local Registered Social Landlords is an important inclusion to ensure that the policy does not undermine the purpose and effectiveness of Policy HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing) of the Local Plan **[A1]**, where the principle of affordable housing is permitted within the Countryside Policy Area. Without this provision the allowance for small scale growth outside of the development boundaries of Small Growth Villages risks undermining the delivery of affordable homes which relies upon sites being available on terms which allow for the delivery of affordable housing. Landowners are considered unlikely to make land available on such terms if policies allow for market housing without giving priority to affordable provision.
- 2.10.5 In response to Regulation 19 consultation feedback, further explanation has been proposed to Criterion 3f. of Policy SS 1 of the Local Plan **[A1]** as a minor modification, reference PMIN/SS1/02 of Schedule 4 Proposed Additional Minor Modifications **[A5.11]**. The proposed amendments offer further clarity and context to the terms of *adjacent land*, *local Registered Social Landlords* and *agreed terms*, contained within Criterion 3f. of the policy.

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications **[A5.11]**. The Table below details the relevant modifications in relation to the response above.

PMIN/SS1/01	Amend Policy SS1, criterion 3e. as follows: e. The proposal incorporates substantial <u>proportionate</u> community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network; and
PMIN/SS1/02	Provide additional footnotes in relation to Policy SS1, Criterion 3f. as follows: 2. ‘adjacent developable land’ relates to land all in the same ownership. 3. ‘local Registered Social Landlords’ that are active in the area. 4. ‘agreed terms’ relates to the terms agreed with the Local Authority.

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

- a) Aldborough
- b) Badersfield (Scottow)
- c) Bacton
- d) Binham
- e) Catfield
- f) Corpusty & Saxthorpe
- g) East Runton
- h) Happisburgh
- i) High Kelling
- j) Horning
- k) Little Snoring
- l) Little Walsingham (Walsingham)
- m) Overstrand
- n) Potter Heigham
- o) Roughton
- p) Sculthorpe
- q) Sea Palling
- u) Southrepps
- v) Sutton
- w) Trunch
- x) Walcott
- y) Weybourne

2.11.1 Yes. The Council has identified five Small Growth Villages that have specific issues which have been taken into account in Policy SS 1 of the Local Plan **[A1]**, as summarised below.

2.11.2 In terms of all of the identified Small Growth Villages, each has been assessed in relation to a range of environmental, social and economic sustainability factors, as detailed in the response to Question 2.6. The detailed assessments for the Small Growth Villages are set out in Chapter 9 and Appendix 3 (Village Assessment & Settlement Profiles) of the Background Paper, which provide an array of settlement information, as well as highlighting the presence and location of any specific designations and constraints in relation to each of the settlements, for example, flood risk, landscape and wildlife designations, designated and non-designated heritage assets.

b) Badersfield (Scottow)

2.11.3 Scale of growth: a post Regulation 19 review of the Small Growth Villages highlighted that the updated population estimate (mid 2016) for Badersfield produced a comparatively high Indicative Housing Allowance, based on 6% growth. Consequently, such an allowance would potentially give rise to the development of more new dwellings within the settlement when compared to the majority of the higher order Large Growth Villages. Coupled with the identification that the Douglas Bader School does not function as a catchment school for the settlement, the 6% growth allowance, was seen to be disproportionately high for the level of services and facilities within the settlement. As a result, it has been proposed to reduce the Indicative Housing Allowance for Badersfield to 3% growth, as set out in the proposed minor modification PMIN/4.1/01 to Table 2 Small Growth Villages

Housing Apportionment as described in Appendix A of Schedule 4 Proposed Additional Minor Modifications **[A5.11]**.

j) Horning

2.11.4 Scale of growth: Development in Horning is subject to an updated Joint Position Statement **[EX012]** and updated Statement of Fact by Anglian Water **[EX013]**. Issues in Horning relate to Water Recycling Centre permit compliance, increased flows due to groundwater and surface water infiltration and nutrient loading. The Council is working jointly with the Broads Authority, the Environment Agency and Anglian Water to resolve this. More details on the issue and levels of investment can be found in the Council's Infrastructure Delivery Plan, Background Paper No. 4 **[C4]** and Anglian Water's updated Statement of Fact. Two minor modifications have been proposed, reference PMIN/4.1/03 to Table 2 and PMIN/4.1/04 to paragraph 4.1.9, of the Plan as set out in Schedule 4 Proposed Additional Minor Modifications **[A5.11]**, to provide clarity to the Plan and that ensure any future housing development for the Small Growth Village of Horning should take account of the Joint Position Statement on Development in the Horning Water Recycling Centre Catchment and subsequent future revisions. See also the section on Horning in the response to question 1.6.

n) Potter Heigham, q) Sea Palling, x) Walcott

2.11.5 Location and scale of growth: Although the settlements of Sea Palling, Potter Heigham and Walcott meet the service provision requirements to be identified as Small Growth Villages, a review of the other stated factors within the methodology set out in Background Paper 2 **[C2]** concluded in Chapter 5, page 15, that these settlements may not be able to realistically contribute to future growth, due to the likely environmental constraints. Sea Palling is entirely located within Flood Zone 3A. The majority of Potter Heigham is located within Flood Zones 2 and 3A, with only the northern extent of the settlement situated in Flood Zone 1. Taking account of climate change, the majority of the Walcott also falls within Flood Zones 2 and 3A, with only pockets to the southeast of the village within Flood Zone 1. In addition, Walcott's coastline and much of its built-up area are located within the identified Coastal Change Management Area, limiting its suitability for new permanent housing development.

2.11.6 All three settlements are, therefore, identified as 'Constrained Small Growth Villages' in Table 2 Indicative Housing Allowance, where it is concluded that no development can be relied upon. The policy nevertheless allows for these settlements to grow up to the stated allowance of 6% if suitable sites can be identified.

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications **[A5.11]**. The Table below details the relevant modifications in relation to the response above.

PMIN/4.1/01	Table 2 'Small Growth Villages Housing Apportionment' provides updated Indicative Housing Allowances for Small Growth Villages and
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	updated footnotes. (see updated Table 2 in Appendix A of Schedule 4 [A5.11])
PMIN/4.1/03	See updated Table 2 ‘Small Growth Villages Housing Apportionment’ in Appendix A of Schedule 4, with additional footnote as follows: ‘3. Development should take account of the Joint Position Statement on Development in the Horning Water Recycling Centre Catchment and subsequent future revisions (add hyperlink).’
PMIN/4.1/04	Add the following text to the end of Para. 4.1.9 as follows: ‘Development in Horning is subject to a Joint Position Statement and updated Statement of Fact by Anglian Water. Issues in Horning relate to Water Recycling Centre permit compliance, increased flows due to groundwater and surface water infiltration and nutrient loading. The Council is working jointly with the Broads Authority, the EA and Anglian Water to resolve this. More details can be found in the Council’s Infrastructure Delivery Plan.’

Policies SS2 & SS3

2.12 Are Policies SS2 and SS3 positively prepared, justified, effective and consistent with national policy?

2.12.1 Yes, the Council considers that the submitted Plan, along with the proposed additional modifications, reflects the district’s strategic aims and objectives, and has been positively prepared, is justified through robust and proportionate evidence, as set out in the document library [A14], and is consistent with national policy. A self-assessment of the Plan against the legal and soundness tests has been undertaken using the PAS self-assessment check sheets. Further information can be seen in the examination library [A11 and A12]. A number of policies/elements of policies have been developed to compliment wider strategic agreements through the Norfolk Strategic Framework and input from statutory bodies which is seen as testament to positively working together.

2.12.2 Policies SS2 and SS3 are entirely consistent with national policy and are founded on locally specific and proportionate evidence which takes proper account of the characteristics of the district. The policies provide an effective basis for delivering sustainable growth in the district.

2.13 Would limited infilling/rounding off, to be defined, be justified in villages or hamlets not defined as Small Growth Villages and without settlement boundaries?

2.13.1 No, the Local Plan [A1] provides ample opportunities, including through policies SS 1 Spatial Strategy, SS 2 Development in the Countryside, SS 3 Community-Led Development, and housing policies such as HOU 1 Delivering Sufficient Homes, HOU 2 Delivering the Right Mix of Homes, HOU 3 Affordable Homes in the Countryside (Rural Exceptions Housing) without the need to build within identified Countryside.

The wider Plan and in particular, the distribution of growth set out through the settlement hierarchy, is built upon the principles of climate resilient sustainable growth, in line with national policy and guidance and as set out in Policy CC 1 of the Local Plan Submission Version **[A1]**.

- 2.13.2 The Sustainability Appraisal Report **[A3]** informed plan development through testing and evaluating the submitted Plan's policies and reasonable alternatives against the 16 SA Objectives. The alternative policy options for the spatial strategy (pages 320 – 328 of SA Report), included a dispersed development approach to housing delivery (Policy SD3B, pages 324-326), which would see development in a significant number of small rural communities and hamlets. This approach scored negatively against the majority of the SA Objectives, which demonstrates the significant impact such an approach would have on the principle of sustainable development.
- 2.13.3 In addition, it is important to recognise that approximately half of the population of the district live in the large number of smaller villages, hamlets, and scattered dwellings, which are dispersed throughout a large rural area. Much of the area identified as Countryside in North Norfolk is also subject to national designations, such as the Norfolk Coast AONB, Heritage Coast and Undeveloped Coast and there is also a large rural conservation area (Glaven Valley), as well as many internationally important wildlife sites. Consequently, the potential for limited infilling or rounding off in all villages and hamlets in the identified Countryside, where there are limited or no day to day services and facilities, could deliver a significant amount of unsustainable development across the dispersed countryside area, that would not accord with the principles of economic, social, and environmental objectives as set out in paragraph 8 of the NPPF and would also be contrary to the climate resilient sustainable principles detailed in Policy CC 1 of the Local Plan Submission Version **[A1]**.
- 2.13.4 Appropriate development within the Countryside is set out in Policy SS 2 of the North Norfolk Local Plan **[A1]**. The Policy includes the opportunity for the development of affordable homes, replacement dwellings, the sub-division of dwellings and the development of essential rural workers accommodation. As such, the principle of housing development is not entirely excluded from the Countryside Policy Area but is necessarily directed towards specific types of homes.