

Author	North Norfolk District Council
Session details	Week 2 Day 1: Matter 5 Day 2: Matter 5 (continued)
Scheduled Hearing Date	Tuesday 13 February 2024, 9:30am Wednesday 14 February 2024, 9:30am
Exam Library No.	EH011 (a) (i)

North Norfolk District Council's response to Inspector's Matters, Issues & Questions (5.1 to 5.13) in relation to:

Matter 5: Places & Housing Sites

Issue: Whether the housing allocations, settlement boundaries and policy designations in the plan are justified and consistent with national policy and whether the site-specific policies for the allocations are effective.

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

www.north-norfolk.gov.uk/localplanexamination

[BLANK PAGE]

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 been subject to extensive promotional activity and a small number are subject to 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.

All of the sites proposed for allocation in the Plan are available for development and have been promoted by site owners and/or developers through a call for sites process. Many have determined or pending planning applications. The selection process has included comparison with a large number of alternatives, Sustainability Appraisal, application of a comprehensive Site Selection Methodology, two formal rounds of public consultation and consideration of deliverability factors. There has been extensive consultation with key consultees and each of the site-specific policies has been modified to address most concerns identified. The results are summarised in the Site Assessment Booklets [D1-D12] which explain how each proposal meets the available, suitable and deliverable tests in the NPPF.

Policy Area Designations and Development Boundaries have been reviewed and updated as part of Plan preparation to ensure they are up to date and effective.

Response to Inspector's questions

5.1 General Questions

5.1.1 Does the methodology set out in the Norfolk Housing and Economic Land Availability Assessment (HELAA – Documents D13-D16) represent a justified approach to housing land assessment in general terms?

5.1.1.1 Yes. The HELAA is set out in four documents [D13,14, 15 & 16]. Document D13 details the methodology used, D14 is the consolidated report, while D15 and D16 represent the assessment proformas for each site and the settlement and site maps. The approach set out is justified and grounded through national guidance. The HELAA has been prepared to determine the potential housing and economic land supply in North Norfolk over the next 20 years. It identifies the theoretical capacity which could be considered for development to meet the objectively assessed needs identified for housing and economic development in Norfolk across the period 2016-2036. The HELAA itself did not determine whether a site should be allocated in the Local Plan, but the methodology should form the basis of site selection which followed an iterative process. The methodology was prepared by and agreed collectively by all Norfolk Planning Authorities following a period of public consultation as part of the Duty to Cooperate.

5.1.1.2 The HELAA provided each Local Planning Authority with an audit of land regardless of the amount of development needed to meet identified need and regardless of the spatial hierarchy set out in the Plan. Its purpose is to test whether there is sufficient land to meet objectively assessed need (OAN) and identifies where this land may be located. The HELAA represents just one part of wider evidence and should not be considered in isolation of other evidence. This approach is supported by the national PPG which states that “...The assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan (emerging Local Plans) themselves to determine which of those sites are the most suitable to meet those needs - PPG Reference ID: 3-003-20140306.

5.1.1.3 The methodology used is set out in the HELAA Methodology [D13] and is in accordance with the guidance set out in the Housing and Economic Land Availability Assessment section of the National Planning Practice Guidance (dated 27 March 2015). It was developed jointly through the Norfolk Strategic Framework and used by all LPAs at this stage of Plan making so that a consistent methodology across Norfolk was used as part of the Duty to Co-operate requirements and cross boundary co-operation. The methodology has been subject to specific public and stakeholder consultation (in line with PPG guidelines) and also scrutinised through the Local Plan examinations of adjacent Norfolk authorities. The assessment was based on five stages based on those set out in the PPG. More information on this and the methodology is contained in examination document [D13].

5.1.1.4 The HELAA results were used as a starting point for site selection. Sites were

subsequently screened out due to absolute constraints such as being in a non-selected settlement, coastal erosion zones or flood zone 3. Each site was considered on its own merits utilising an assessment criterion based on that used by the Norfolk Authorities in their joint approach to the HELAA as set out in Appendix A of Background Paper 6: Development Site Selection Methodology [C6]. This process included a number of stages including consideration of further suitability criteria and assessment against availability and deliverability criteria and applying the sustainability appraisal assessment [A3] and Habitat Regulations Assessment [A4]. The full details of this process are set out in Background Paper 6: Development Site Selection Methodology [C6]. The assessments have followed an iterative process and the full assessments for the proposed sites and the alternatives considered are set out in the individual settlement site assessment papers [D1-D12].

5.1.2 Have all existing unimplemented housing allocations been brought forward into the emerging Plan? if not, please list and give reasons.

5.1.2.1 No, all proposed site allocations have been assessed in the same way and the Authority has not carried forward previous unimplemented housing allocations unless they comply with the proposed settlement hierarchy and are suitable, available and have a realistic prospect of being delivered over the plan period. Sites which are not carried forward into the new Plan are largely located in the existing Service Villages where the new Plan does not propose to make specific allocations.

5.1.2.2 The existing allocations in Service Villages and Coastal Service Villages are all in settlements classed as Small Growth Villages in the proposed strategy of the new plan and therefore could come forward under the 6% indicative housing allowance in Policy SS1.

5.1.2.3 Table 1 provides details of current unconsented allocations from the adopted Development Plan together with reasons why they have, or have not, been carried forward in the proposed plan.

Table 1. Proposed Status of Existing Unconsented Housing Allocations

Site Ref.	Location	Proposal and Reasons
C01	Cromer	Site lies within the proposed development boundary of Cromer so is available for suitable development without the need to allocate. Existing allocation not carried forward into proposed plan.
NW28a	North Walsham Football Club	Site being retained as football club so not available for development. Existing allocation not carried forward into proposed plan.
ALD01	Aldborough	Site partly developed. Remainder of allocation not carried forward as Aldborough classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
BAC03	Bacton	Allocation not carried forward as Bacton classified as

		Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
CAT01	Catfield	Allocation not carried forward as Catfield classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
COR01	Corpusty	Allocation not carried forward as Corpusty classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1. Site is allocated in the adopted Corpusty Neighbourhood Plan.
HAP07	Happisburgh	Allocation not carried forward as Happisburgh classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
HOR06	Horning	Allocation not carried forward as Horning classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1 if drainage constraints are addressed.
SN05	Little Snoring	Allocation not carried forward as Little Snoring classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
ROU03	Roughton	Allocation not carried forward as Roughton classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
SOU07	Southrepps	Allocation not carried forward as Southrepps classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
WAL01	Walsingham	Allocation not carried forward as Walsingham classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1
WEY09	Weybourne	Allocation not carried forward as Weybourne classified as Small Growth Village where proposed plan does not include allocations. Site could come forward under 6% growth allowance in Policy SS1

5.1.3 What is the definition of the term units of elderly care accommodation, and how does this relate to the Use Classes C3 (dwelling houses) and C2 (residential institutions)?

5.1.3.1 The Plan uses the term Specialist Elderly/Care provision rather than 'elderly care' and is defined in footnote 3 of Policy HOU2 to 'including' Extra Care, Sheltered Housing, Assisted Living, Dementia Care and Nursing and Care Homes. This definition is deliberately broad and flexible to reflect the range of needs identified in the evidence and the need to take account of the adequacy of types of provision at the time of application.

5.1.3.2 The policy allows for compliance being achieved via the provision of either dwellings (C3 Use Class) or Residential institutions (C2 Use Class) or a combination of both. For this reason, the policy requirement is expressed in 'units' rather than dwellings to reflect the possibility of the need being addressed by providing accommodation in either Use Class.

5.1.3.3 The Plan provides further guidance at para 7.2.12 explaining that the defining feature of such units is the provision of care rather than the age of the occupants. Requested modification PMIN/7.2/03 [A5.11] would provide further clarification.

5.1.4 In general terms, unless there are site-specific issues, how have site capacities been estimated, both for dwellings and units of elderly care accommodation?

5.1.4.1 The exact number of dwellings to be delivered on all proposed allocations is to be determined through detailed consideration of any relevant planning application that is submitted on each site. The Council has provided an estimate of the possible site capacity that can be delivered on each proposed allocation to ensure the Plan is achieving its housing targets for the Plan period. Within each site allocation policy totals are usually expressed as *approximates* rather than site specific *targets*.

5.1.4.2 The Council's HELAA [D13-D16] describes the initial approach the Council took, whereby a mixed method approach was used to establish the development potential for each site by firstly reviewing any relevant adopted policies in the Core Strategy in regard to density, Policy H07 - Making the Most of Efficient Land Use. The Council then used any existing information already available on-site capacity, such as any submitted masterplans or technical evidence provided to the Council through the Call for Sites process, or historic applications in addition to any previous work undertaken for the currently adopted Plan. If no pre-existing information was available, the Council determined the site capacity using a simple calculation:

5.1.4.3 $\text{Site Area} \times \text{Density (30 or 40dph)} = \text{Site Capacity}$

5.1.4.4 Once this capacity was derived using either method mentioned above, the Council used the site assessment and Plan Making processes to identify site-specific constraints, open space, and infrastructure requirements all of which would reduce the development potential of the site such as flood risk, topography, or specific site requirements. This is set out further in Chapter 7 of Background Paper 6, Site Selection Methodology [C6].

5.1.4.5 In regard to specialist care, the requirement is determined through Policy HOU2 in the Plan, which requires sites of 151 dwellings to provide a minimum of 60 units, with a further 40 units required for each additional 250 dwellings thereafter. Providers of these types of accommodation will typically require between 0.6 and 1 hectare for each 60 bed facility. A site 'take' of around 1 hectare has been used.

5.1.5 In general terms, unless there are site-specific issues, how have the areas of public open space been calculated for each allocation?

- 5.1.5.1 In general terms the quantity of open space required for each proposed allocation was identified through the use of the Council's adopted open space standards as set out in the Plan [A1] at paras 5.2.6 - 5.2.7, page 74, and evidenced through the supporting Open Space Assessment [G11]. An open space calculator was used to ascertain the policy compliant amount of total open space based on the total number of dwellings being allocated whilst using the standard housing mix as used in the Council's Local Plan viability studies [I11]. The calculator applies the required policy compliant standards based on household size and the number of bed spaces.
- 5.1.5.2 This allows the calculator to determine how much open space and the mix of open space required based on an indicative mix of dwellings on-site, the equivalent number of persons that it would generate and application of the required standards. The Calculator then separates the overall hectareage of open space that is required into the different forms of open space as described in para. 5.2.6 of the Plan and provides a final overall figure in hectares. More detail of this can be found in the supporting Open Space Study [G11], pages 122-125. This overall figure was applied to each site-specific policy.
-

5.1.6 Some allocations are affected by a defined Minerals Safeguarding Area and Policy CS16 of the Norfolk Minerals and Waste Core Strategy applies. What are the implications of this for the principle of development or for its timing, if any? Have the Minerals Planning Authority supplied site by site comments on these sites? If so, what are they?

- 5.1.6.1 The NPPF (paragraph 212) states that local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. NPPG paragraph 005 Reference ID: 27-005-20140306 is also relevant. Norfolk County Council, as the Mineral Planning Authority considers that it should be a policy requirement to ensure that safeguarded mineral resources are not sterilised by non-mineral development where this could be avoided and consequently this is included in the policy requirement for each relevant site. The Minerals Planning Authority have provided site by site comments and requested the addition of standard policy wording where applicable.
- 5.1.6.2 Policy CS16 of the adopted Norfolk Minerals and Waste Core Strategy requires investigation and assessment of the mineral, potentially followed by prior extraction to ensure that needless sterilisation of viable mineral resource does not take place on sites that are underlain by a safeguarded mineral resource.
- 5.1.6.3 The Minerals Authority has confirmed that Policy CS16 need have no implications for the principle of development or for its timing provided that the necessary investigations and assessments are conducted prior to the submission of the planning application and the reports and assessment accompany the application.

Any intrusive site investigations and assessment can then be carried out at the same time as other similar assessments, such as for flood risk and geo-technical risk. Prior extraction of sand and gravel need not impact on housing or employment delivery provided that the requirements necessary to prevent needless sterilisation of mineral resources are conditioned and that any Material Management Plan- Minerals is considered holistically with the construction phases. For multi-phase developments, non-mineral development may not be planned to come forward for several years, providing the opportunity for more comprehensive mineral extraction to take place well in advance of each development phase.

- 5.1.6.4 The approach is positively prepared, effective, and consistent with national policy and is already a requirement of the adopted Minerals and Waste Local Plan.
- 5.1.6.5 Norfolk County Council, as the Minerals Planning Authority (MPA) provided site by site comments at the Regulation 18 consultation stage in June 2019, which are set out below.
- 5.1.6.6 For all of the following sites the comment provided by the MPA was: ‘The following wording should be included in the allocation policy: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.”
- Policy C16 – Former Golf Practice Ground Overstrand Road (Cromer)
 - Policy C22/2 – Land west of Pine Tree Farm, Norwich Road (Cromer)
 - Policy F03 – Land at Junction of A148 & B1146, Opposite Petrol Filling Station (Fakenham)
 - Policy H20 – Land at Heath Farm (Holt)
 - Policy H27/1 – Land at Heath Farm (Employment) (Holt)
 - Policy HV01/B – Land east of Tunstead Road (Hoveton)
 - Policy NW01/B - Land at Norwich Road and Nursery Drive (North Walsham)
 - Policy NW62 - Land West of North Walsham
 - Policy MUN03/B - Land off Cromer Road and Church Lane (Mundesley)
 - Policy ST23/2 – Land North of Yarmouth Road, East of Broadbeach Gardens (Stalham)
 - Policy E7 – Land at Tattersett Business Park (Tattersett)
- 5.1.6.7 For the following sites the comment provided by the MPA was: ‘The following wording should be included in the allocation policy: “The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. As the site is under 2 hectares it is exempt from the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 – ‘safeguarding’, in relation to mineral resources. If the site area is amended in the future to make the area over 2 hectares CS16 (or any successor policy) will apply.”
- Policy F10 – land south of Barons Close (Fakenham)
 - Policy W01/1 – Land adjacent Holkham Road (Wells-next-the-Sea)

Relevant Proposed Modifications

Additional Modifications to the Plan are put forward through Schedule 4 - Schedule of Proposed Additional Minor modifications [A5.11]. The sites listed in the Table below detail the relevant proposed modifications, to provide consistency in all of the site-specific policies, as reiterated by Norfolk County Council, as MPA, in their comments at Regulation 19 stage.

PMIN/14.1/02	Policy NW01/B Mixed Use: Land at Norwich Road and Nursery Drive. Insert new criterion, no.10, at the end of the policy. Text proposed as stated above for NW01/B.
PMIN/14.3/02	Policy NW62/A Mixed Use: Land West of North Walsham. Insert new criterion, no.18 (after no.17) with new heading <u>Mineral Safeguarding</u> . Text proposed as stated above for NW62/A.
PMIN/21.1/03	Policy MUN03/B Residential: Land off Cromer Road & Church Lane Insert new criterion, no.9, at the end of the policy. Text proposed as stated above for MUN03/B.
PMIN/22.1/03	Policy E7 Employment: Tattersett Business Park. Insert new criterion, no.6, at the end of the policy. Text proposed as stated above for E7.

General Responses to site-specific questions A-K

In response to the site-specific questions A-K provided in Matter 5, where the question does not require site-specific details, the Council considers a single response to the question to be a suitable approach. The response to these questions are provided below. The remaining questions that require site-specific detail are provided under each allocation heading.

C) **Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?**

All proposed modifications are justified and effective. Major and minor modifications have been proposed for the majority of proposed allocations and are a result of the Council engaging directly with statutory and general bodies through a range of consultation methods in order to ensure the involvement of a wide audience as part of the plan making process. Through the Regulation 19 Consultation, the Council received a total of 697 representations. In reviewing these comments, the Council identified and summarised the main issues which can be found in the Council's Consultation Statement [A5].

In response to the issues raised, the Council has produced a Schedule of Additional Proposed Modifications [A5.11-12] for consideration during examination, based on the representations received during Regulation 19 [A5.8-5.9]. These proposed modifications include amendments to text and policy where they are considered to be helpful in aiding the interpretation and implementation of the Plan by improving its effectiveness, clarity and addressing many of the concerns made during consultation. The majority of the proposed additional modifications are considered to be minor in nature and consist of grammatical fixes, factual updates or improve the legibility and understanding of policy wording. Where proposed modifications require a change to a site's boundary, the justification is provided below:

Cromer C22/2 - the Council are proposing a modification to the boundary of the site to take into account the need to provide more land to effectively deliver the necessary and appropriate access arrangements to ensure access into the site is suitable. This approach has been agreed between the Council, Norfolk County Council's Highways Team, and the site developers.

Hoveton HV01/B - additional land is required in order to ensure the proposed development can deliver the requirements set out in the Plan without being detrimental to the overall design of the site, the additional land is within the same ownership and is promoted by the intended developer in order to improve viability and assist in the delivery of a comprehensive drainage strategy.

Mundesley MUN03/B - as explained in the Council's response to Question 5.13.2, a reduction in the extent of the site's boundary was required due to the Council reducing the scale of the site from 50 dwellings to 30 dwellings, in order to mitigate impacts on a nearby heritage asset.

Stalham ST23/2 - a change in the site boundary is proposed to accommodate additional land that is almost entirely encompassed by the existing site boundary, the

landowner for this parcel has requested its inclusion within the boundary of the proposed allocation to allow for a more comprehensive approach to site development to potentially be considered.

D) Have the impacts of development been properly taken into account?

Yes, the impacts and effects of development on each of the proposed allocations has been comprehensively taken into account via the use and implementation of:

- A comprehensive Sustainability Appraisal process
- A detailed Site Assessment Methodology [C6]
- Consultation and testing of proposals with internal and external consultees and through public consultation.
- Completion of Habitat Regulations Assessment

The results of these processes are presented in the Site Booklets [D1-D12]. The background Site Assessment methodology provides a detailed description of the process and assessment criteria adopted.

These processes ensure that each site proposal has been subjected to a consistent and extensive assessment process which identifies the potential impacts and effects of development and the need for any mitigation. Unsuitable sites which did not meet the assessment criteria were ruled out. Policy requirements were refined following each stage of assessment and consultation to ensure that development proposals address any possible adverse impacts. This is further explained in Background Paper 6 [C6].

E) Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?

The first paragraph of each site-specific policy is justified and describes the components of the proposed allocation. Each of the proposed larger allocations requires the delivery of elderly/ specialist care and open space in quantities justified by the Plan's supporting evidence and required by the policies in the Local Plan. The quantum of open space required for new development is set out in Policy HC2, the justification for which is provided in the Council's response to Question F and Question 5.1.5. The threshold for providing elderly persons accommodation on-site is set out in Policy HOU2 which requires sites of 151 dwellings or more, or sites larger than 4ha in size to provide a minimum of 60 units of specialist care provision. The resulting quantity and distribution of provision is justified by the evidence [E5].

F) What form would open space take?

The quantum of open space required is specified in each of the site-specific policies. The mix of open space uses is required to be provided in accordance with the adopted open space standards. These standards are included in Policy HC2 and Appendix 2 of the Plan and ensures a mix of types in the provision of open space based on identified need and deficiencies as identified in the Open Space Study [G11].

The Open Space calculator was produced for the Council in order to identify on and off-site requirements for open space for different sized developments, and the costs which are index linked and updated annually the calculator only provides an example of how costs and mix of open space could be provided however, the Council's implementation of this calculator in determining the open space required for each allocation does not take into site-specific circumstances and given that at this allocation stage the precise number of dwellings and their types are not known, it is not possible to determine the precise mix of open space uses until an application is made. For this reason and for flexibility, the site-specific policies require a specific minimum amount of open space but do not determine its type.

G) Having regard to these components, is the estimate of the site capacity justified?

The approach to estimating site capacity is justified as described in the Council's response to question E. More detail on the approach to estimating site capacity is provided in the Council's response to question 5.1.4.

In summary, the approach taken is detailed within Background Paper 6, Site Methodology (Chapter 7) [C6], and is shown below:

- Establish the total size of the site.
- Deduct land for open space requirement based on a generic housing mix.
- Deduct land for specialist care requirement (1ha per 60 beds) based on operator models.
- Apply density calculator to remainder to establish approximate dwelling yield.
- Make any site-specific adjustments to reflect the site-specific constraints on development.

The dwellings capacity expected to be yielded on most of the proposed allocations are expressed as approximates to be provided rather than a specific minimum or maximum figure.

I) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

The site-specific requirements for all sites are justified, effective and consistent with national policy. They are the result of detailed assessment as explained Background Paper 6 [C6] and consistent engagement between the Council and internal and external consultees, including statutory consultees and stakeholders, which has occurred throughout the site assessment and Local Plan process. Any requirements identified in this way have been based on either a need to alleviate impacts and mitigation solutions have been provided and agreed upon where appropriate, or they are due to a need for specific infrastructure provision to enable to the site's development. This approach towards collaborative engagement in creating site-specific requirements is in accordance with para. 16 (section C) of the NPPF.

J) Given the components of the proposal and site requirements, would development of the site be viable?

Yes. The Plan has undergone viability testing throughout its development with due regard to the requirements of the NPPF and the best practice advice contained in the national PPG on viability. The assessments concluded that “all sites are broadly viable and deliverable across the entire plan period, taking in account of the affordable housing requirements and all policy impacts of the Local Plan but at this stage, there is not a practical opportunity to introduce a Community Infrastructure Levy” [I11] Para 6.11.

The Study is a high-level assessment of whole plan viability and as such is not intended to represent a detailed viability assessment of every individual site. In line with viability guidance, the margin of viability and affordable housing percentages were based upon the assessment of typologies which typically reflect the nature of the proposed allocations. The study applied general assumption in terms of affordable housing, planning policy costs impacts and identified site mitigation factors based on generic allowances. In line with the policies in the Plan, proposals should be policy compliant, where a proposal seeks departure from a policy on viability grounds, the council would expect a site-specific viability assessment to be provided at time of application.

5.2 Cromer

5.2.1 Are the detailed Settlement Boundaries for Cromer, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.2.1.1 Yes, settlement boundaries and the various policy area designations for Cromer are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

- 5.2.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.2.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Cromer. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.
-

5.2.2 Are the housing allocations for Cromer the most appropriate when considered against the reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.2.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.2.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.
- 5.2.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.

- 5.2.2.4 In Cromer, the overall suggested scale and location of development has sought to balance the need for growth whilst protecting the setting and special qualities of the AONB and the setting of the town's surrounding landscape. The majority of sites assessed in the Cromer area are located within the AONB, and most of these were located in areas that were intrusive in the open landscape and detrimental to the special qualities of the AONB, particularly to the west of the settlement where the landscape is more elevated, when compared to C16, which is well contained within the built form of Cromer, and C22/2 which does not extend too far into the open countryside that it becomes highly visible in the AONB. Both proposed allocations are of a scale large enough to provide appropriate mitigation through effective design and landscaping whilst providing sufficient housing. The only large site not located within the AONB is C10, Runton Road/Clifton Park however, this site is very prominent in the wider landscape.
- 5.2.2.5 Discounted sites were not chosen for a number of reasons including the impact development could have on loss of public open space, impact on heritage assets and on the overall landscape. Sites that were located on brownfield land, of which there were few, are supported in the Plan but do not need to be allocated as they can come forward at any time and progress through the development management process. The assessed site, C10, Runton Road/Clifton Park was identified as a preferred option at Regulation 18. The site however received a high number of objections including on landscape and ecological grounds, in addition to objections regarding the importance of protecting the undeveloped gap between the edge of Cromer and East Runton, amongst other concerns. Following review of the Regulation 18 consultation responses the Council resolved to discount this site from further consideration.

5.2.3 Land at Cromer High Station, Norwich Road (C07/2)

A) Has the site been allocated previously or is it a new allocation?

5.2.3.1 Land at Cromer High Station, Norwich Road(C07/2) is an existing allocation for mixed use residential development in the Council's currently adopted Site Allocations Development Plan (February 2011) as policy, C07 – Land at Jubilee Lane/Cromer High Station.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.2.3.2 **DE21/18/0011** (May 2018) - A pre-application discussion was had with the Council in May 2018 for a development of 25 dwellings on the site.

PO/19/0281 (February 2019) - Outline planning application for residential development of up to 24 dwellings. This application was withdrawn in September 2021.

No applications related to the purpose of the proposed allocation have been submitted.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.2.3.3 For C07/2, the Council can confirm the site was in the singular ownership of Norfolk County Council and was not being promoted by a developer until the site went to auction in June 2022. The site was then sold to a developer that specialises in employment development.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.2.3.1 C07/2 proposes a residential development of 22 dwellings which could be deliverable in the plan period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as having 0 dwellings coming forward during the plan period. The proposed allocation is currently being promoted by a developer that specialises in employment development, the Council are not against this possible alternative development but there is still potential for the site to come forward for residential development, therefore the site has remained in the latest trajectory but is listed as providing 0 dwellings in the Plan Period at the moment.

5.2.4 Former Golf Practice Ground, Overstrand Road (C16)

A) Has the site been allocated previously or is it a new allocation?

5.2.4.1 The proposed allocation at the Former Golf Practice Ground, Overstrand Road (C16) is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref - H0711), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.2.4.2 There have been a number of applications on the site which related to the previous use of the site as a golf practice course. Two applications for residential development were submitted in 2004 and 2005, both were refused. In March 2023, an application was submitted to the Council in relation to the current proposed allocation:

PO/23/0596 (March 2023) - Erection of up to 118 dwellings and up to 60 units of specialist elderly care accommodation with public open space, landscaping, and sustainable drainage system (SuDS) and vehicular access point (Outline with all

matters reserved except for access). The Council resolved to approve this application in December 2023 subject to completion of a Section 106 legal agreement.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.2.4.3 The proposed allocation is being promoted by a developer, Gladman Homes, who have a promotional agreement with the site owner. The site is in single ownership and is available for development.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.2.4.4 C16 proposes a residential development of approx. 150 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as having all the site commence development in 2027/2028 with development progressing over a period of 4 years until 2030/2031. This trajectory is confirmed as realistic by the promoter in their recent planning application.

L) Does the proposal constitute a major development in the AONB, and if so, does it satisfy the test set out in NPPF?

5.2.4.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF which states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:

- A. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
- B. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- C. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.2.4.9 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:

"...whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined."

- 5.2.4.10 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:
- Blakeney - BLA04/A
 - Cromer - C16, C22/2
 - Sheringham - SH04, SH18/1B
 - Wells-Next-The-Sea - W01/1, W07/1
- 5.2.4.11 The Plan intends to deliver an estimated 4,300 homes on allocated sites throughout the Plan Period, of this figure, the just 743 dwellings being delivered within the AONB which constitutes approximately 17% of the overall quantum being delivered through this Plan on allocations.
- 5.2.4.12 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council's need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council's distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district's growing population.
- 5.2.4.13 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan's Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement's outside of the AONB that may not be considered to be as sustainable in the Council's Settlement Hierarchy.
- 5.2.4.14 In addition, through the Plan making process, the Council has found that there is a public interest to provide new opportunities for development where they live, including in settlements located in or adjacent to the AONB. The site-specific policies provided within the Plan do not just require the delivery of housing but also require provision of key community facilities and improved accessibility that will benefit the local community, an example of this is shown within Policy C22/2 in Cromer which requires the delivery of new sports pitches and a footbridge over

the railway line.

- 5.2.4.15 Furthermore, the 2019 AONB Management Plan [G14] provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.2.4.16 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.2.4.17 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.2.4.18 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

5.2.5 Land West of Pine Tree Farm, Norwich Road (C22/2)

A) Has the site been allocated previously or is it a new allocation?

- 5.2.4.1 The proposed allocation Land West of Pine Tree Farm, Norwich Road (C22/2) is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref - H0049), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.2.4.2 The front part of the site closest to the Norwich Road is subject to a hybrid application **PO/18/2169** (November 2018) seeking Outline permission for up to 300 dwellings to include a new roundabout and access onto the A149 and associated infrastructure and Full permission for provision of a new football club comprising the creation of football pitches, erection of clubhouse, changing facilities, new access road and formation of a new car park.

5.2.4.3 Determination of the application has been held in abeyance with the applicant's agreement pending promotion of allocation of a larger site, as now proposed, in the Submission Local Plan.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.2.4.4 The site is in three ownerships with the owners working together to promote and deliver a comprehensive development in accordance with the policies of the Plan.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.2.4.5 C22/2 proposes a residential development of approximately 400 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2027/2028 with development progressing over a period of several years until 2036. As part of plan preparation, the site promoters have completed significant technical appraisals including in relation to access strategy, biodiversity, site layout and phasing and development viability. Subject to allocation the promoters are in a position to make a revised planning application during 2024. Development of the site is not subject to nutrient neutrality requirements. Commencement of development in 2027/28 is realistic and is confirmed by the site promotor.

L) Does the proposal constitute a major development in the AONB, and if so, does it satisfy the test set out in NPPF?

5.2.4.6 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:

- A. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
- B. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- C. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.2.4.7 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:

"...whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a

significant adverse impact on the purposes for which the area has been designated or defined.”

- 5.2.4.8 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:
- Blakeney - BLA04/A
 - Cromer - C16, C22/2
 - Sheringham - SH04, SH18/1B
 - Wells-Next-the-Sea - W01/1, W07/1
- 5.2.4.9 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.
- 5.2.4.10 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council’s need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council’s distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district’s growing population.
- 5.2.4.11 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan’s Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement’s outside of the AONB that may not be considered to be as sustainable in the Council’s Settlement Hierarchy.

- 5.2.4.12 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.2.4.13 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.2.4.14 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.2.4.15 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

5.3 Fakenham

5.3.1 Are the detailed Settlement Boundaries for Fakenham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.3.1.1 Yes, settlement boundaries and the various policy area designations for Fakenham are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.3.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

5.3.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Fakenham. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.3.2 Are the housing allocations for Fakenham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.3.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.

5.3.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and

throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria.

- 5.3.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.3.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.3.2.5 In Fakenham, the location of site options has been carefully considered in order to avoid expansion of the town beyond the boundary formed by the A148 corridor which suitably contains the built form of the settlement, sites beyond this boundary are more prominent in the landscape and are poorly located in regard to existing services and facilities. The Plan also seeks to identify sites that can effectively mitigate the potential impacts on designated landscapes and the flood plain of the river Wensum to the west. The proposed allocations to the north of the settlement are already identified in the currently adopted Plan and are rolled forward into the Submission Plan.
- 5.3.2.6 A number of the sites which were considered at Regulation 18 stage are located within the adopted development boundary of the town, resulting in these sites performing relatively well throughout the site assessment process. These possible alternatives are located on sites that already contain beneficial uses such as employment or open space. The approach take in the strategy of the Plan is to retain such uses instead of seeking to formally allocate. Redevelopment of in boundary sites may nevertheless be acceptable if proposals accord with the policies of the Plan.

5.3.3 Land North of Rudham Stile Lane (F01/B)

A) Has the site been allocated previously, or is it a new allocation?

- 5.3.3.1 The proposed allocation, F01/B is a smaller part of a larger site that was previously allocated in the Council's adopted Site Allocations Development Plan, (February 2011) as, F01.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.3.3.2 **PO/17/0680** (May 2017) – Outline planning application (all matters reserved except for primary means of access reserved for future approval) for residential development of up to 950 dwellings (use class C3) employment development (A1/3/4/5) and associated public open space and infrastructure. This application relates solely to the area east of Water Moor Lane and does not include site F01/B which is consequently rolled forward into the new Plan reflecting its lack of planning permission.

Application PO/17/0680 was approved on 11th October 2021.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.3.3.3 The site is in multiple ownerships. All owners are supportive of the allocation but Fakenham Town Council and Fakenham Rugby Club, which own smaller areas on the southern boundary of the site, are not currently actively promoting development. The majority of the proposed allocation, F01/B lies within two ownerships including Trinity College who control the adjacent site from where the principle point of access will be required. The site capacity of approximately 560 dwellings is based on all parcels of land within the allocation being developed.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.3.3.4 F01/B proposes a residential development of approximately 560 dwellings. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2033 with development progressing over a period of several years until 2039/40. This reflects both the Council’s and the site promoters expectations that development of this site will follow that on the adjacent land to the east and the need to address nutrient neutrality requirements.

5.3.4 Land Adjacent to Petrol Filling Station, Wells Road (F02)

A) Has the site been allocated previously, or is it a new allocation?

5.3.4.1 Proposed allocation F02 is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref – H0056), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.3.4.2 There have been no applications submitted to the Council in regard to this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.3.4.3 The proposed allocation, F02 is under single ownership and is being brought forward by the landowner with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.3.4.4 F02 proposes a residential development of approximately 70 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2026/27 with development progressing over a period of three years until 2028/29.

5.3.5 Land at Junction of A148 and B1146 (F03)

A) Has the site been allocated previously, or is it a new allocation?

5.3.5.1 The proposed allocation, F03 is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref – H00215), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.3.5.2 There have been no applications submitted to the Council in regard to this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.3.5.3 The proposed allocation, F03 is under single ownership and is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.3.5.4 F03 proposes a residential development of approximately 65 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2026/27 with development progressing over a period of two years until 2027/28. The Council has engaged with all site promoters throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

5.3.6 Land South of Barons Close (F10)

A) Has the site been allocated previously, or is it a new allocation?

5.3.6.1 The proposed allocation, F10 is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref – H0485), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.3.6.2 There have been no applications submitted to the Council in regard to this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.3.6.3 The proposed allocation, F10 is under single family ownership and is being brought forward by the owners with the intention of negotiating with potential developers in the near future (option completed with developer recently)

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.3.6.4 F10 proposes a residential development of approximately 55 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over a period of two years until 2027/28. This reflects the owners/developers expectations and reflects that nutrient neutrality requirements are likely to be addressable within the allocated area.

5.4 Holt

5.4.1 Are the detailed Settlement Boundaries for Holt, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.4.1.1 Yes, settlement boundaries and the various policy area designations for Holt are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.4.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate

proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

- 5.4.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Holt. This included Background Paper 3: Approach to Employment **[C3]** (in relation to **Employment Land** designations) and Amenity Green Space Study **[G13]** (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study **[H3]** and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.
-

5.4.2 Are the housing allocations for Holt the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.4.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA **[D13]** and Site Selection Methodology Background Paper **[C6]** explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.4.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet **[D1-D12]** provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.
- 5.4.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered ‘in-fill’ within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan’s general allowance for windfall developments.
- 5.4.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA’s Assessment Matrix.

- 5.4.2.5 In Holt, after the recent permission for residential development in addition to the provision of a new school, the key remaining land use requirements are for new homes given Holt's position in the Settlement Hierarchy. Overall, both the suggested scale and location of development has sought to balance the need for growth whilst protecting the setting of the Glaven Valley and Holt Conservation Areas, and the special qualities of the AONB to the north of the settlement. The Historic Impact Assessment undertaken identified several possible impacts on heritage assets located in an around Holt and suggested possible mitigation options. These have been taken into account and considered when identifying the most suitable sites.
- 5.4.2.6 Discounted sites were not chosen for a number of reasons. Those to the north of the settlement are subjected to several constraints, being located in the AONB and would have detrimental impacts on the landscape whilst also adversely affecting the setting of the Conservation Area and environmental designations. Potential sites to the west would extend development into an elevated landscape with exposed views, H17 however sits well within the built form and does not intrude into the landscape. Proposed allocation H20 is located immediately adjacent to a previous allocation that has already started construction and reflects the existing development across the A148.

5.4.3 Land North of Valley Lane (H17)

A) Has the site been allocated previously, or is it a new allocation?

5.4.3.1 Land North of Valley Lane, H17 is a new allocation. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref – H0108), the details of which are set out in the Council's HELAA **[D13-D16]**.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.4.3.2 **PF/23/0537** – Hybrid application comprising a Full application for 15 dwellings along with vehicular and pedestrian access, services/utilities infrastructure through the site, and an Outline application (all matters reserved except for access) for seven 'self-build' dwellings. This application is pending consideration.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.4.3.3 The proposed allocation, H17 is under single ownership and is being brought forward by an agent with the intention of negotiating with potential developers in the near future, dependent on the outcome of the application referred to in response to Question B.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.4.3.4 H17 proposes a residential development of approximately 27 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over a period of two years until 2026/27. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site. In the case of this proposed allocation, the Council has a signed SoCG that confirms delivery of the site is achievable and the site is available for development.

5.4.4 Land at Heath Farm (H20)

A) Has the site been allocated previously, or is it a new allocation?

5.4.4.1 The proposed allocation, H20 is a previous allocation including within the adopted Site Allocations Development Plan (February 2011) as Land at Heath Farm/Hempstead Road, H09. The site was submitted again to the Council through the Call for Sites process in January 2016 (HELAA Ref – H0105), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.4.4.2 No applications have been submitted in regard to this proposed allocation however there have been applications submitted to the Council for the currently adopted allocation, H09:

PO/16/0253 (February 2016) – Erection of 215 dwellings, employment land, public open space, and provision of a roundabout and vehicular link road from Cromer Road (A148) to Heath Drive with associated landscaping infrastructure (outline application). Application approved August 2016.

PF/16/0253 (June 2019) – Reserved Matters submission for appearance, landscaping, layout, and scale for the erection of 212 dwellings with public open space, highways, and other infrastructure pursuant to outline permission (PO/16/0253). Application approved April 2020.

PM/20/2643 (December 2020) – Erection of 66, 2 storey care home for older people with associated parking and access, pursuant to outline permission (PO/16/0253). Application approved September 2021.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.4.4.3 Proposed allocation, H20 is under single ownership and is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.4.4.4 H20 proposes a residential development of approximately 180 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2027/28 with development progressing over a period of four years until 2031/32. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

5.5 Hoveton

5.5.1 Are the detailed Settlement Boundaries for Hoveton, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.5.1.1 Yes, settlement boundaries and the various policy area designations for Hoveton are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.5.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

5.5.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Hoveton. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.5.2 Are the housing allocations for Hoveton the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.5.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.

5.5.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and

throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.5.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered ‘in-fill’ within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan’s general allowance for windfall developments.
- 5.5.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA’s Assessment Matrix.
- 5.5.2.5 In Hoveton, the location of the preferred site option has been carefully considered in order to provide a site which is a natural and obvious extension to the residential development, Brook Park which is now complete.
- 5.5.2.6 Discounted sites were not considered due to a number of constraints, most notably inadequate access arrangements, poor connectivity and adverse impacts on the highway network and wider landscape. The majority of sites assessed for Hoveton were large in scale and would overprovide on the need for Hoveton and would create significant stress on the highway network, particularly the Wroxham Bridge area. The proposed allocation, HV01/B is well situated in regard to existing services and facilities and fits well into the built form of the settlement without extending significantly into the open countryside, unlike the majority of discounted sites in this location.

5.5.3 Land East of Tunstead Road (HV01/B)

A) Has the site been allocated previously, or is it a new allocation?

- 5.5.3.1 Land East of Tunstead Road, HV01/B is a new allocation in the Plan and lies immediately adjacent to an allocation previously adopted in the Site Allocations Development Plan (February 2011) as, HV03. The site was submitted to the Council through the Call for Sites process in January 2016 (HELAA Ref – H0120), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.5.3.2 PF/19/1659 (September 2019) – Hybrid application: Full planning application for 150 dwellings, a new link road between Tunstead Road and Stalham Road, associated infrastructure and public open space. Outline planning application for

the provision of 1ha of land for up to 75 bedspace of age-restricted care-dependent dwellings for elderly persons. This application was refused by the Council in March 2021 on the grounds that the application failed to meet the requirements of several policies in the adopted Core Strategy and failed to have adequate regard to the Council's Design Guide.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.5.3.3 The site is under single ownership, the site is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.5.3.4 HV01/B proposes a residential development of approximately 120 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement **[EX007]** lists the site as commencing development from 2026/27 with development progressing over a number of years until 2030/31. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

5.6 North Walsham

5.6.1 Are the detailed Settlement Boundaries for North Walsham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

- 5.6.1.1 Yes, settlement boundaries and the various policy area designations for North Walsham are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.
- 5.6.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.6.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within North Walsham. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.6.2 Are the housing allocations for North Walsham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.6.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.6.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and

throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.6.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.6.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix. Though NW62/A was given several Amber ratings in the SA assessment of the site, this identifies a need to mitigate these possible constraints, which a site of this scale has the opportunity to deliver without compromising the site's development potential, unlike other alternatives in the area.
- 5.6.2.5 In North Walsham, the settlement does not have significant environmental and landscape constraints that are found else in the district. It is expected over the Plan Period that a process of re-development, infill developments and changes of use will continue to provide a supply of new homes and other uses, these opportunities are relatively modest however and will not address the identified need for new homes. Therefore, new greenfield allocations are necessary in order to deliver the required growth for North Walsham.
- 5.6.2.6 There were over 50 sites to consider in North Walsham, most of which were greenfield sites around the edge of the settlement boundary. Discounted sites were not chosen for a number of reasons, including the impact development could have on the landscape and those where suitable vehicular access is not achievable were also ruled out. Some sites were poorly located in regard to key services and facilities and sites were discounted in areas where the promotion of active travel opportunities into the town centre area would be considered unsuitable due to distance. Site selection also sought to avoid sites which are detached from the town and not well related to the existing built form.
- 5.6.2.7 The delivery of a larger number of smaller sites around the town may deliver the appropriate level of housing required, however, such a strategy would not deliver the strategic infrastructure benefits for North Walsham, namely the improvements to transport infrastructure, enhanced green and open spaces and other community benefits such as providing for educational needs.
- 5.6.2.8 The Open Space Study **[G13 & G13.1]** demonstrates that the town has deficiencies across all types of open space with the most acute being allotments, amenity greenspace and parks & recreation grounds, all of which could be provided for on a

larger site and can be used to create a well-designed scheme that would otherwise be unachievable on smaller sites.

- 5.6.2.9 The three proposed allocations for North Walsham are the most appropriate options to meet the housing and employment land requirements. They are all well located to services within the town centre, NW01/B is an extension to an existing allocation in the adopted Plan which already demonstrates the suitability of development in that area of the settlement. NW62/A is located adjacent to several key services and facilities and presents opportunities to provide public benefits including the provision of a link road to alleviate some existing highways impacts and improvements to community facilities such as the football club, whilst also being able to fulfil the needs identified in the Open Space Study.

5.6.3 Land at Norwich Road & Nursery Drive (NW01/B)

A) Has the site been allocated previously, or is it a new allocation?

- 5.6.3.1 The proposed allocation, NW01/B is part of an already adopted allocation in the Site Allocations Development Plan (February 2011) as NW01. NW01/B includes the remaining parcels of land within NW01 that have not yet been developed and includes additional land further south. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0683), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.6.3.2 Applications for NW01:

PF/15/1010 (July 2015) – Hybrid proposal: Full planning permission for erection of 100 dwellings and outline planning permission for 0.89ha of commercial space. This application was approved December 2016.

PF/13/0866 (July 2013) – Erection of 176 dwellings with access, open space and associated works and formation of station car park and outline application for employment development. This application was approved August 2014.

Applications for NW01/B:

PF/22/1596 (June 2022) – Hybrid planning application comprising of:

1. Full Planning application for the construction of 343 dwellings, access onto Ewing Road and Hornbeam Road, public open space, play areas, landscaping, and other associated infrastructure.
2. Outline planning application for a phased development comprising of 7 self-build plots.
3. Outline planning application for the construction of an elderly care facility and associated infrastructure, including landscape and open space.

This application is pending consideration.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.6.3.3 The land is in multiple ownership however, the previous development on NW01 demonstrates the landowners are effectively working together to develop the overall site, with the intention of negotiating with potential developers in the near future. Development of the site is promoted by Hopkins Homes who delivered the adjacent site.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.6.3.4 NW01/B proposes a residential development of approximately 350 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over a number of years until 2032/33. The current planning application that has been submitted for this proposed allocation indicates commencement of development could potentially occur sooner. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

5.6.4 Land West of North Walsham (NW62/A)

A) Has the site been allocated previously, or is it a new allocation?

5.6.4.1 The proposed allocation, NW62/A is a new allocation in the Plan. The site was included within the Call for Sites process in January 2016 and comprises of multiple submissions (HELAA Ref – H0157/156/712/355/685/677/167/2081/159/686/688 /684/687/926), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.6.4.2 The site does not have planning permission, there have been no applications for this proposed allocation as of December 2023. However, the Consortium behind this proposed allocation is preparing an outline application with the intention to submit in 2024, which will cover the entire allocation.

The Council and the Consortium have been working together alongside other stakeholders to produce a Development Brief to help facilitate the submission of a future planning application. This brief covers the entirety of the proposed allocation and was publicly consulted on in September/October 2023. Work on the Brief is still ongoing at the time of writing.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.6.4.3 NW62/A lies within multiple ownership. The Council has regularly engaged with the Consortium of landowners that own the majority of the land within the site's boundary and are collectively progressing the site in association with an agent, the remaining parcels of land to the north of the site lie outside of the Consortium's ownership and are owned by multiple landowners.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.6.4.4 NW62/A proposes a residential development of approximately 1,800 dwellings. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2026/27 with development progressing over a number of years and beyond the Plan Period. The likely trajectory has been agreed with the promoters and is considered realistic.

5.6.5 What is the rationale for the western boundary of the allocation?

5.6.5.1 The proposed allocation was submitted to the Council through the Call for Sites process by the relevant landowners in its entirety. No additional land has been sought since.

5.6.6 What is the vision for the western link road? Would it function as a town by-pass taking heavy goods vehicles away from the town centre? Given expected traffic flows, would suitable environment and connectivity between the housing on each side and the town centre be achieved? Would it include a northern extension over the railway to connect to Cornish Way, or a southern extension to the A149 south. Are these essential to the effectiveness of the road, and if so, would they be a requirement of developing the allocation? If not, how might they be funded?

5.6.6.1 The western link road will serve two purposes. Its design will provide for comprehensive, and cost effective, access to the development proposal itself but it will also serve to redistribute traffic, including HGVs around and through the town in a more effective way. As well as its principal role as a highway the authority is keen to ensure that its design contributes positively towards placemaking and the appearance of the development. Its design will need to accommodate cars, HGVs, a bus route through the development and segregated pedestrian and cycle facilities. To achieve this, it must link Norwich Road to Cromer Road at an early stage in the development.

5.6.6.2 Two further documents are being prepared, the North Walsham West Development Brief **[D18]** and a Draft Transport Assessment **[EX017-EX018]**. The prior approval of both of these, together with a number of other technical appraisals will be required before development proceeds.

5.6.6.3 Neither the northern or southern extension to the link road are required for the effectiveness of this road but the design of the which should not prejudice the delivery of a future northern link. These options were included in early feasibility work to ensure that its configuration took proper account of longer-term options. The northern link beyond the Link Road Rail Bridge is desirable but not essential in highway terms.

5.6.7 What would be the impact of traffic generation on the wider area, for example through the village of Coltishall, what improvements or traffic management might be required if needed to mitigate the effects of the scheme, are these costed and deliverable and has any effect on viability been taken into account?

5.6.7.1 A draft Transport Assessment **[EX017-EX018]** has been prepared. The scope of this has been agreed with the Highway Authority and Broadland District Council. The assessment concludes that there will be significant increases in peak hour traffic passing through Coltishall and Horstead and that these impacts will require a package of mitigations.

5.6.7.2 The package of mitigations has been scoped, designed, subject to safety audit by the highway authority, is deliverable within the extent of the public highway and at a high level has been costed. It has been subject to public consultation in Coltishall and Horstead.

5.6.7.3 The measures identified as required, to ensure no severe residual impacts include:

- Comprehensive measures within the development itself to encourage/facilitate modal shift including public transport facilities, retention and improvement of on and off site walking and cycling facilities and the provision of key community facilities and employment opportunities within the development site.
- New bus gate facility in High Street Coltishall, provision of which serves to remove parked cars at a pinch point in the highway and eases traffic congestion.
- New right turn lane at the junction of Norwich and Ludham Road to reduce queuing traffic.
- Speed controls on entry to village
- Pedestrian crossing improvements

5.6.7.4 A Position Statement on behalf of the Highway Authority is included at **Appendix 1**. This Position Statement confirms that Norfolk County Council as the Highway Authority have considered the draft transport assessment submitted as EX017-18

and generally confirm that for this stage of the process, the proposals set out in the Transport Assessment are acceptable but may require additional work in the future.

- 5.6.7.6 The likely package of mitigations is relatively modest in terms of cost and have been fully considered as part of the Viability Position Statement. All parties, including the developer consortium are committed to early delivery of these mitigations and recognise the need to deliver improvements at Coltishall/Horstead before any significant development proceeds.
- 5.6.7.7 As part of the Statement of Common Ground the parties expect to commit to revised policy wording which will more clearly define, and obligate the developer, to deliver a defined package of mitigations.
-

5.6.8 About 7ha of the site in the Cromer Road/Bradfield Road area is intended for employment uses. Is this the allocated area north of Cromer Road? For effectiveness, should this be allocated as such? Would its development be phased in relation to the housing and/or a requirement of it?

- 5.6.8.1 Criteria 17 of the site allocations policy requires the provision of 7 hectares of employment land 'in the Cromer Road/Bradfield Road Area.' A number of configurations are possible and likely to be acceptable to North Norfolk District Council. The Authority considers that it is not necessary at this stage to be precise in relation to location. In fact, the precise distribution of land, access arrangements, relationship with other proposed uses and landscape strategy are, in the Authorities opinion, best left to be addressed in the required Development Brief and later planning application stages.
- 5.6.8.2 Delivery of the employment land will need to be phased and is a matter which will be addressed via conditions and/or legal agreement attached to applicable planning permissions. See response to 5.6.9
-

5.6.9 How would the development of the site be phased, and would the traffic effects within the town be acceptable during each phase? How does the cost of the western link road affect the viability and deliverability of development?

- 5.6.9.1 Development of the site will need to be phased in order to ensure that it is delivered in a comprehensive manner which provides all proposed land uses and supporting infrastructure when it is required. The consortium promoting development of the site has a controlling interest over around 87% of the allocated area and has an equalization agreement with the three principal landowners. All key policy requirements can be delivered by the consortium on land within their control via completion of a single Section 106 Legal Agreement.
- 5.6.9.2 It is proposed that the phasing of development will be agreed as part of the first application on the site which will either be a single outline application for the

entirety of the development or a hybrid proposal to include reserve matters approval for a first phase of development.

- 5.6.9.3 Phasing of development has been discussed but not yet agreed. A Draft Phasing Plan which broadly reflects the developers and local authority expectations is attached as **Appendix 2**. This approximate phasing has been reflected in a site specific Viability Assessment. This Assessment has been submitted to the LPA which has taken independent viability advice to confirm, for the purposes of plan making, that the inputs into the appraisal are reasonable.

5.7 Sheringham

5.7.1 Are the detailed Settlement Boundaries for Sheringham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.7.1.1 Yes, settlement boundaries and the various policy area designations for Sheringham are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.7.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

5.7.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Sheringham. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.7.2 Would a Settlement Boundary for Beeston Regis be justified?

5.7.2.1 No, a settlement boundary for Beeston Regis would not be justified. Beeston Regis is a residential area with very limited services and facilities as a result, it is not identified within the Council's Settlement Hierarchy and is therefore, not a location the Council wants to direct growth towards. Additionally, Sheringham is adjacent to Beeston Regis and provides a much more sustainable location for growth. The details of the Council's assessment for Beeston Regis can be found in Background Paper 2, Distribution of Growth [C2].

5.7.3 Are the housing allocations for Sheringham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.7.3.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.7.3.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.
- 5.7.3.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.7.3.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.7.3.5 In Sheringham, the location of site options has been carefully considered in order to avoid significant expansion of the town beyond its natural boundaries and mitigate the potential impacts on landscape and designations such as the AONB. There is very little previously developed land in Sheringham, therefore new greenfield allocations are necessary to deliver the required growth. There are a range of factors which influenced the potential scale and location of development. In particular, at Regulation 18 the Highway Authority requested that the overall delivery of new dwellings in Sheringham be reduced to 130 due to pressures a high amount of new development would have on the A149/A1082 and A48/A1082 junctions. This is in addition to environmental, landscape and historic impact that were considered when assessing sites.
- 5.7.3.6 Discounted sites were not chosen for a number of reasons, including the impact development could have on highways and junction impacts, the AONB and the wider landscape and possible impacts on heritage assets. Some sites were assessed and considered to have a beneficial use including providing green space and/or recreational space, which is considered important to retain, sites to the west of the settlement were discounted for this reason in addition to their scale and impact on the setting of the AONB. Sites that are not well connected to key services and

facilities and those that cannot achieve suitable access to the town centre through active travel and public transport due to their distance were also considered unsuitable.

- 5.7.3.7 The three proposed allocations for Sheringham are considered to be the most suitable sites available and are the most sustainable options to ensure the Plan meets the housing target for Sheringham and overall strategy of the Plan. They are well located to services and facilities within the town centre and within walking distance to local schools. They are well contained within the landscape and subject to appropriate mitigation, scale and design will result in limited visual intrusion into the AONB, and the countryside.

5.7.4 Land Adjoining Seaview Crescent (SH04)

A) Has the site been allocated previously, or is it a new allocation?

- 5.7.4.1 The proposed allocation, SH04 is a previous allocation adopted in the Council's Core Site Allocations Development Plan (February 2011) as, SH04. The boundary for both allocations remains the same, previously the allocation was for 25-45 dwellings, the Council has chosen an approximate capacity of 45 dwellings for the site. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0970), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.7.4.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

- 5.7.4.3 The site is within single ownership, it is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

- 5.7.4.4 SH04 proposes a residential development of approximately 45 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2026/27 with development progressing over a number of years until 2029/30. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

- L) Does the proposal constitute a major development in the AONB, and If so, does it satisfy the test set out in the NPPF paragraph 177?**
- 5.7.4.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:
- A. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
 - B. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - C. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 5.7.4.6 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:
- “...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”
- 5.7.4.7 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:
- Blakeney – BLA04/A
 - Cromer – C16, C22/2
 - Sheringham – SH04, SH18/1B
 - Wells-Next-The-Sea – W01/1, W07/1
- 5.7.4.8 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.
- 5.7.4.9 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council’s need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council’s distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district’s growing population.
- 5.7.4.10 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in

Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan's Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement's outside of the AONB that may not be considered to be as sustainable in the Council's Settlement Hierarchy.

- 5.7.4.11 In addition, through the Plan Making process, the Council has found that there is a public interest to provide new opportunities for development where they live, including in settlements located in or adjacent to the AONB. The site-specific policies provided within the Plan do not just require the delivery of housing but also require provision of key community facilities and improved accessibility that will benefit the local community, an example of this is shown within Policy C22/2 in Cromer which requires the delivery of new sports pitches and a footbridge over the railway line.
- 5.7.4.12 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.7.4.13 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:

- 5.7.4.14 “Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty.”
- 5.7.4.15 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.
-

5.7.5 Former Allotments, Weybourne Road, Adjacent to The Reef (SH07)

A) Has the site been allocated previously, or is it a new allocation?

- 5.7.5.1 The proposed allocation, SH07 is a new allocation. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0221), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.7.5.2 The proposed allocation, SH07 has full planning permission from the following application:

PF/21/3141 (November 2021) – Erection of 2 storey 70 bed care home and 24 affordable dwellings with associated amenity space, access, parking, service, drainage, and landscaping infrastructure. This application covers the entire proposed allocation and was approved May 2022. Development is under construction and the Care Home is almost complete.

H) What is the land ownership position and is the site currently being promoted by a developer?

- 5.7.5.3 The site is within single ownership.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

- 5.7.5.4 The proposed allocation has attained planning permission through the application referenced under Question B and is currently under construction.
-

5.7.6 Land South of Butts Lane

A) Has the site been allocated previously, or is it a new allocation?

- 5.7.6.1 The proposed allocation, SH18/1B is a new allocation immediately adjacent to a previously allocated site in the Site Allocations Development Plan (February 2011)

as, SH14 which now has planning permission. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0280), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.7.6.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.7.6.3 The site is in single ownership is being brought forward by a developer, with intention to develop dependent on any future application.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.7.6.4 SH18/B proposes a residential development of approximately 48 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over a number of years until 2027/28. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) Does the proposal constitute a major development in the AONB, and If so, does it satisfy the test set out in the NPPF paragraph 177?

5.7.6.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:

- D. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
- E. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- F. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.7.6.6 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:

“...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

5.7.6.7 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:

- Blakeney – BLA04/A
- Cromer – C16, C22/2
- Sheringham – SH04, SH18/1B
- Wells-Next-The-Sea – W01/1, W07/1

5.7.6.8 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.

5.7.6.9 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council’s need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council’s distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district’s growing population.

5.7.6.10 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan’s Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement’s outside of the AONB that may not be considered to be as sustainable in the Council’s Settlement Hierarchy.

- 5.7.6.11 In addition, through the Plan Making process, the Council has found that there is a public interest to provide new opportunities for development where they live, including in settlements located in or adjacent to the AONB. The site-specific policies provided within the Plan do not just require the delivery of housing but also require provision of key community facilities and improved accessibility that will benefit the local community, an example of this is shown within Policy C22/2 in Cromer which requires the delivery of new sports pitches and a footbridge over the railway line.
- 5.7.6.12 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.7.6.13 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.7.6.14 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.7.6.15 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

M) As part of a larger field, how has the site boundary been determined?

- 5.7.6.16 As detailed in the Council's Site Assessment Booklet for Sheringham **[D6]**, SH18/1B is part of a larger site, SH18/1A (which resembles the original HELAA submission, H0280) which lies within the same ownership. The Council's assessment of the larger site found the site to be constrained if developed entirely due to comments received from NCC's Highways Team and the fact that the larger site would extend into the open countryside in a way that could not be appropriately mitigated. SH18/1B's site boundary was determined through identifying the most appropriate extent for development to occur without causing significant harm to the landscape and be suitable in terms of highways impacts, this has been achieved by reducing the extent of the western boundary to be more in keeping with the surrounding built form, and therefore reducing the overall scale of development. The western

boundary is not based on any physical boundaries, but the policy includes a requirement, Criterion 3, to provide a substantial landscape buffer along the western boundary to create a suitable boundary for the site and mitigate any visual impacts.

5.8 Stalham

5.8.1 Are the detailed Settlement Boundaries for Stalham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.8.1.1 Yes, settlement boundaries and the various policy area designations for Stalham are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.8.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

5.8.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Stalham. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.8.2 Are the housing allocations for Stalham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.8.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.

5.8.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts

of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.8.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.8.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.8.2.5 In Stalham, the location of site options has been carefully considered in order to avoid significant expansion of the town beyond its natural boundaries and to mitigate the potential impacts on designated landscapes.
- 5.8.2.6 Discounted sites were not considered further for a number of reasons, including the impact development could have on the surrounding landscape, particularly the Broads to the southwest of the settlement. A number of sites were assessed south of Stalham and are technically considered to be within Sutton, these sites are unsustainable in terms of connectivity and detached from the main core of Stalham and its services and facilities and would lead to the overdevelopment of Sutton. Other sites to the north of Stalham were discounted for their intrusion into the wider landscape and their overall scale of potential development and are poorly related to Stalham's built form or they are not well connected to existing services and facilities.
- 5.8.2.7 ST19/A is part of a larger site that was assessed as being suitable for development however, the site an increased scale of further development in this location would be in excess of the need required for Stalham, as such a smaller site, ST19/A is considered more suitable to address the identified need. Though the assessment ST23/2 identified some concerns over heritage and landscape impacts, the Council considers the requirements set out in the site-specific policy to be effective in mitigating both of these issues.

5.8.3 Land Adjacent Ingham Road (ST19/A)

A) Has the site been allocated previously, or is it a new allocation?

- 5.8.3.1 The proposed allocation, ST19/A is a new allocation that lies immediately adjacent to the north of an existing, partially built out allocation included within the Site Allocation Development Plan (February 2011) as, ST01. The site was included within

the Call for Sites process in January 2016 (HELAA Ref – H0247), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.8.3.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.8.3.3 The site is in single ownership and is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.8.3.4 ST19/A proposes a residential development of approximately 70 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over a number of years until 2027/28. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) As part of a larger field, how has the site boundary been determined?

5.8.3.5 As detailed in the Council’s Site Assessment Booklet for Stalham [D7], ST19/A is part of a larger site, ST19 (which resembles the original HELAA submission, H0280) which lies within the same ownership. The Council’s assessment of the larger site found the site to be suitable for development however, given the scale of ST19 and the presence of a previously adopted allocation in the settlement, it was not deemed necessary to include a site of this size in addition to the second proposed allocation in Stalham, ST23/2. In light of this, a reduced site was preferred, ST19/A, the boundary for which was created by identifying the appropriate scale required for this proposed allocation. Though there are no physical, existing boundaries to define the site’s northern extent, the policy includes a requirement, Criterion 7, which requires the provision of suitable landscaping buffering to soften the impact of the site from views to the north.

M) Is the use of Grade 1 agricultural land justified?

5.8.3.6 Yes, the use of Grade 1 agricultural land in this instance is justified. The Council’s Plan making, and site assessment process identifies the most sustainable sites for development with the assistance of the Sustainability Appraisal [A3], which includes

the reference to best and most versatile land in the Sustainability Objective, SA1 as part of the overall assessment of each site. The findings of the full site assessment for each proposed allocation and alternatives can be found within both the Sustainability Appraisal and the Site Assessment Booklets in the assessment Matrix. The SA found that, through the assessment of alternative sites, that the vast majority of sites were located within best and most versatile land and that there were no suitable alternative locations for development that could be identified outside of these areas.

5.8.4 Land North of Yarmouth Road, East of Broadbeach Gardens (ST23/2)

A) Has the site been allocated previously, or is it a new allocation?

5.8.4.1 The proposed allocation, ST23/2 is a new allocation that includes part of a previous allocation adopted in the Site Allocations Development Plan (February 2011) as, ST01.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.8.4.2 Applications related to the adopted allocation, ST01:

PF/12/1427 (December 2012) – Mixed use development comprising 150 dwellings, B1 employment buildings, public open space, landscaping and associated highways and drainage infrastructure. This application was approved March 2013.

5.8.4.3 Applications related to the proposed allocation, ST23/2:

PF/16/0240 – Application for mixed use development comprising 34 dwellings and up to 12 commercial units. This application was withdrawn.

PF/21/2021 (July 2021) – A new residential development of 40 affordable houses comprising 22 affordable/shared ownership houses and one block of 18 affordable flats. This application is pending consideration.

PF/21/1532 (June 2021) – Extra care development of 61 independent one- and two-bedroom flats, with secured landscaped communal gardens, associated visitor and staff car and cycle parking, external stores, and a new vehicular access onto Yarmouth Road. This application is pending consideration.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.8.4.4 The site is in single ownership and being promoted by an agent however, the proposed modification, PMIN16.2/01 **[A5.11]** to the site-specific policy for ST23/2 requires additional land to be included within the site's boundary, this additional piece of land is under different ownership and is not being promoted by the same

agent. However, both are in agreement to this proposed inclusion of land in the allocation.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.8.4.5 ST23/2 proposes a residential development of approximately 80 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2024/25 with development progressing over a number of years until 2026/27. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) Is the delivery of 1ha of employment land a fundamental part of the scheme, and if so, is this a justified requirement?

5.8.4.6 The addition of 1ha of employment land is a continuation of the requirements set out in the already adopted allocation, ST01 which required not less than 2ha of land suitable for community and low-key employment generating uses. The site provides a care home which offers some employment opportunities on site. Background Paper 3 [C3] includes reference in Para 2.19 to the presence of existing employment allocation allocated within the adopted Core Strategy which has not since been taken forward for development and availability is no longer confirmed, therefore the Council considers this allocation as an opportunity to continue to provide choice and flexibility as an alternative opportunity for employment provision.

M) Is the use of Grade 1 agricultural land justified?

5.8.4.7 Yes, the use of Grade 1 agricultural land in this instance is justified. The Council's Plan making, and site assessment process identifies the most sustainable sites for development with the assistance of the Sustainability Appraisal [A3], which includes the reference to best and most versatile land in the Sustainability Objective, SA1 as part of the overall assessment of each site. The findings of the full site assessment for each proposed allocation and alternatives can be found within both the Sustainability Appraisal and the Site Assessment Booklets in the assessment Matrix. The SA found that, through the assessment of alternative sites, that the vast majority of sites were located within best and most versatile land and that there were no suitable alternative locations for development that could be identified outside of these areas.

5.9 Wells

5.9.1 Are the detailed Settlement Boundaries for Wells-next-the-Sea, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

- 5.9.1.1 Yes, settlement boundaries and the various policy area designations for Wells-next-the-Sea are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.
- 5.9.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.9.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Wells-next-the-Sea. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Town Centre Areas** and **Primary Shopping Areas** were reviewed as part of the Retail Study [H3] and amended further following public consultation at Regulation 18 stage. **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.9.2 Are the housing allocations for Wells-next-the-Sea the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.9.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.9.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and

throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.9.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered ‘in-fill’ within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan’s general allowance for windfall developments.
- 5.9.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA’s Assessment Matrix.
- 5.9.2.5 In Wells, the scale and location of development has sought to balance the need for growth whilst protecting the setting and special qualities of the AONB through sensitive development that is not too intrusive. All of the sites assessed in the Wells parish are within the AONB, no other alternatives are available. There are a limited number of options for development. The town is located within the proximity of several environmental designations, undeveloped areas within the town largely comprise of attractive or functionally important green spaces which are considered to be important, and the Council will seek to retain.
- 5.9.2.6 Discounted sites were not chosen for a number of reasons, including their location within areas of flood risk, to which all the land within Wells parish north of the A149 and north of the settlement resides within. Sites located south-west of the settlement were considered to be detached from existing services and facilities and the built core of Wells, extending the settlement unnaturally into the countryside and highly intrusive in the wider landscape and the AONB.
- 5.9.2.7 The two proposed allocations of Wells are considered to be the most suitable sites available whilst being subject to policy requirements that will help to alleviate some of the adverse effects both sites may have, particularly on the AONB. W01/1 is adjacent to a previous allocation in the currently adopted Plan and has good connectivity to the town centre, the school and other services. The site is in the AONB but is suitably contained within the built form of Wells and existing tree lined hedgerows to the south. W07/1 has good connectivity to the town centre and other services, the site is more prominent in the landscape than the other proposed allocation, but the Council is mitigating this by including requirements within the site-specific policy to enhance and protect the setting of the AONB through appropriate landscaping and design of the site.

5.9.3 Land South of Ashburton Close (W01/1)

A) Has the site been allocated previously, or is it a new allocation?

5.9.3.1 The proposed allocation, W01/1 is a new allocation that lies immediately adjacent to an already adopted allocation, W01 to the north, which has been built out and previously adopted in the Site Allocations Development Plan (February 2011). The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0700), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.9.3.2 **PF/23/1113** (May 2023) – Erection of 23 dwellings with associated landscaping, vehicular access, and parking provision. This application is pending consideration.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.9.3.3 W01/1 lies within single ownership and is being brought forward by an agent with the intention of negotiating with potential developers in the near future depending on the outcome of the application referred in response to Question B.

K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.9.3.4 W01/1 proposes a residential development of approximately 20 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2024/25 with development progressing over a number of years until 2025/26. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) Does the proposal constitute a major development in the AONB, and if so, does it satisfy the test set out in the NPPF paragraph 177?

5.9.3.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:

- G. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.

- H. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- I. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

5.9.3.6 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:

“...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

5.9.3.7 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:

- Blakeney – BLA04/A
- Cromer – C16, C22/2
- Sheringham – SH04, SH18/1B
- Wells-Next-The-Sea – W01/1, W07/1

5.9.3.8 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.

5.9.3.9 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council’s need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council’s distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district’s growing population.

5.9.3.10 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the

AONB is a nationally significant designation, it is important to consider that if the Plan's Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlements outside of the AONB that may not be considered to be as sustainable in the Council's Settlement Hierarchy.

- 5.9.3.11 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.9.3.12 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.9.3.13 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.9.3.14 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

5.9.4 Land Adjacent Holkham Road (W07/1)

A) Has the site been allocated previously, or is it a new allocation?

- 5.9.4.1 The proposed allocation, W07/1 is a new allocation in the Plan. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0699 and H1011 also applies to this proposed allocation), the details of which are set out in the Council's HELAA **[D13-D16]**.

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

- 5.9.4.2 The site does not have planning permission, there have been no applications for this proposed allocation.
- H) What is the land ownership position and is the site currently being promoted by a developer?**
- 5.9.4.3 W07/1 lies within single ownership, the proposed modification to this site, PMIN17.2/02 and PMIN17.2/04 **[A5.11]** which requires the provision of suitable land for appropriate access arrangements from Mill Road is also within the same land ownership. The site is being brought forward by an agent with the intention of negotiating with potential developers in the near future.
- K) Overall, is the site deliverable within the plan period? and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?**
- 5.9.4.4 W07/1 proposes a residential development of approximately 50 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement **[EX007]** lists the site as commencing development from 2024/25 with development progressing over three years until 2026/27. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.
- L) Does the proposal constitute a major development in the AONB, and if so, does it satisfy the test set out in the NPPF paragraph 177?**
- 5.9.4.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:
- J. The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.
 - K. The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - L. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 5.9.4.6 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:
- “...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

- 5.9.4.7 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:
- Blakeney – BLA04/A
 - Cromer – C16, C22/2
 - Sheringham – SH04, SH18/1B
 - Wells-Next-The-Sea – W01/1, W07/1
- 5.9.4.8 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.
- 5.9.4.9 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council's need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council's distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district's growing population.
- 5.9.4.10 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan's Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement's outside of the AONB that may not be considered to be as sustainable in the Council's Settlement Hierarchy.
- 5.9.4.11 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the

implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.

- 5.9.4.12 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.9.4.13 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.9.4.14 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

M) As part of a larger field, how has the site boundary been determined?

- 5.9.4.15 The promoters of the site submitted a much larger site area to the Council through the Call for Sites process as part of the HELAA [D13 & D15] (H0699). The Council's assessment of this site as shown in the Site Assessment Booklet for Wells-next-the-Sea [D8] found the original submission capable of delivering development in excess of the housing requirement for the settlement, and that development of the entire site would have an adverse impact on the landscape, and townscape of the surrounding area, in addition to the impacts on the AONB. However, the site is well located to services and facilities and could be considered suitable for inclusion in the Plan at a reduced scale that helps to retain the openness of the elevated landscape. This scale was determined by taking into consideration the feedback given at an early stage in the assessment process by relevant consultees. At Regulation 18, the Council consulted on a site of 60 dwellings in this location and upon reviewing the feedback from the consultation, reduced this number further to 50 dwellings and amended the boundary to reflect this.
- 5.9.4.16 The entirety of the original submission is within single ownership and the Council has a signed SoCG with the promoters for this site that indicates both parties are content with the allocation as proposed, except for an agreed modification to the southern boundary of the site to include additional land for suitable access arrangements from Mill Road (PMIN/17.2/02 & PMIN/17.2/04) [A5.11].

5.10 Blakeney

5.10.1 Are the detailed Settlement Boundaries for Blakeney, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

- 5.10.1.1 Yes, settlement boundaries and the various policy area designations for Blakeney are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.
- 5.10.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.10.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Blakeney. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Residential Areas** are the residual area of all other policy area designations and site allocations.
-

5.10.2 Are the housing allocations for Blakeney the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.10.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.10.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against

different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.10.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.10.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.10.2.5 In Blakeney, there are no obvious or straightforward options for development, the village is located within or near to several environmental designations and undeveloped areas within the village itself comprise of attractive or functionally important green open spaces which the Council would seek to retain. The suggested scale and location of development has sought to balance the need for growth whilst protecting the setting and the special qualities of the AONB. All sites assessed in Blakeney are located within the AONB, meaning other alternatives are not presently available. In order to address future housing need for Blakeney, it is necessary to identify one or more development sites in the countryside.
- 5.10.2.6 Discounted sites were not chosen for a number of reasons, including the impact development could have on loss of public open space, adverse impacts on heritage assets and on the wider landscape. Some sites were assessed as having adverse junction and cumulative highway network impacts and were therefore not considered further, in addition sites with poor access were also discounted. Sites to the east of Blakeney were considered to be poorly located to existing services and facilities, detached from the main core of the village whilst also being quite prominent in the landscape.
- 5.10.2.7 One alternative site, BLA01/B is considered to be the only suitable alternative to the proposed allocation, BLA04/A, the Council's Site Assessment Book for Blakeney **[D9]** provides some history to this site in Part 3 of the document however in summary, the Council considers BLA04/A to be more suitable in regard to its relationship with the built form of the village and does not represent a significant intrusion in the countryside, unlike BLA01/B located adjacent to the eastern boundary of the settlement where the site is more visible in the landscape. Whilst BLA04/1 resides within the AONB, the Council has taken steps to mitigate any adverse impacts through the implementation of site-specific policy requirements related landscaping and design.

5.10.3 Land East of Landham Road (BLA04/A)

A) Has the site been allocated previously, or is it a new allocation?

5.10.3.1 The proposed allocation, BLA04/A is a new allocation in the Plan. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0019), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.10.3.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.10.3.3 BLA04/A is in single ownership, the site is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.10.3.4 BLA04/A proposes a residential development of approximately 30 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over two years until 2026/27. This reflects the Council's discussions with the promoter, likely interest in the site and the lack of any requirement to address nutrient neutrality.

L) Does the proposal constitute a major development in the AONB, and if so, does it satisfy the test set out in the NPPF paragraph 177?

5.10.3.5 All proposed allocations located within the AONB can be considered major developments within the designation, however, each site does satisfy the tests set out in the NPPF. Para. 177 of the NPPF states that major development in the AONB should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Considerations of such applications should include an assessment of:

- The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy.

- The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

All sites in Blakeney would be located in the AONB so no undesignated sites would be available.

5.10.3.6 Footnote 60 attached to Para. 177 of the NPPF goes further to describe:

“...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

5.10.3.7 Approximately 743 dwellings are being delivered through the below list of proposed allocations in the Plan which are all located within the AONB, where each could be considered major development within this designation:

- Blakeney – BLA04/A
- Cromer – C16, C22/2
- Sheringham – SH04, SH18/1B
- Wells-Next-The-Sea – W01/1, W07/1

5.10.3.8 The Plan intends to deliver an estimated 4,300 homes throughout the Plan Period, of this figure, the 743 dwellings being delivered within the AONB constitutes approximately 17% of the overall quantum being delivered through this Plan.

5.10.3.9 With regard to Para.177 of the NPPF and the three tests that development in the AONB should be assessed on, the Council’s need for development is set out in the Spatial Strategy, Chapter 4.1 of the Plan and described further within Background Paper 2, Distribution of Growth **[C2-C2.3]**, whereby the Council sets out an approach that uses the Settlement Hierarchy to provide different levels of growth in the most sustainable locations in the Plan Area. This approach is informed by the Sustainability Appraisal **[A3]** which supports the Council’s distribution of growth and recognises that development is required both in urban and rural areas to meet the needs of the district’s growing population.

5.10.3.10 This approach takes into account that development is needed in parts of the district where the AONB exists and presents a constraint to development, such as in Cromer, Sheringham, Blakeney and Wells-Next-The-Sea, settlements that are all considered to be sustainable locations for growth in the hierarchy, but it is acknowledged through the Background Paper 2 and the site assessment process that such areas can be highly constrained by the AONB. Through the site assessment process, alternative sites to those currently proposed in the Plan were sought and assessed and this is presented within the relevant Site Booklets **[D1-D13]** however, no suitable alternatives outside of the AONB were identified, either because infill development of a scale required to suit the needs of the area could not be found or were suitable, or no suitable edge of settlement location could be

identified that was not already within the AONB. In the case of Wells-Next-The-Sea and Blakeney, the settlement is entirely washed over by the AONB, rendering the identification of potential sites outside of this designation impossible. Whilst the AONB is a nationally significant designation, it is important to consider that if the Plan's Spatial Strategy restricted development from the AONB, then these sustainable locations would not benefit from new growth which would be detrimental to the local economy and would place increased pressure on settlement's outside of the AONB that may not be considered to be as sustainable in the Council's Settlement Hierarchy.

- 5.10.3.12 Furthermore, the 2019 AONB Management Plan **[G14]** provides an assessment of the condition of the AONB by reviewing different characteristics, the Plan goes on to conclude (Page 19) that whilst AONB residing settlements have generally expanded to some extent, the character of the AONB has been maintained by the implementation of Conversation Areas within these settlements, and growth has not necessarily had a significant effect on the area's character itself. However, the Plan does raise concerns over insensitive design on new developments. This is expressed further on Page 26 of the Management Plan, where there is reference to a need for any development in the AONB to promote the purpose of its designation (i.e., conservation and enhancement of natural beauty) and 'major' developments must consider the provisions of the NPPF.
- 5.10.3.13 With the above in mind, the Council has identified proposed allocations in the AONB, appropriate steps have been taken by engaging with relevant consultees to provide necessary site-specific policy requirements that protect and enhance the landscape where possible. For every proposed allocation in the AONB, the Council has proposed the following requirement:
- 5.10.3.14 "Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty."
- 5.10.3.15 This criterion is in addition to other requirements based on the mitigation of landscape impacts and promoting the appropriate design of open space on-site, all of which help mitigate any possible adverse impacts on the AONB, the scale and importance of which differs between each site.

M) As part of a larger field, how has the site boundary been determined?

- 5.10.3.16 The boundary of the proposed allocation is based on a general assumption of the necessary required land to deliver housing and associated infrastructure and other site-specific policy requirements.
- 5.10.3.17 The promoters of the site submitted a much larger site area to the Council through the Call for Sites process as part of the HELAA **[D13 & D15]** (H0019). The Council's assessment of this site as shown in the Site Assessment Booklet for Blakeney **[D9]** found the original submission to have an unacceptable adverse impact on the

AONB as the site extends into the open countryside beyond the built form of the settlement, which would also have adverse impacts on nearby environmental assets. The site was considered suitable in regard to all other matters, and it was considered appropriate to reduce the scale of the site to be more in keeping with the built form of the settlement and to help alleviate impacts on the AONB and the nearby environmental assets, in addition to protecting views from the nearby Church. The revised site area was consulted on during Regulation 18 where the site was proposed to deliver 60 dwellings. After reviewing representations received, the Council reduced the quantum of development further to 30 dwellings to further mitigate adverse impacts on the AONB. The boundary is based on a general calculation of the necessary required to deliver housing and associated infrastructure and policy requirements.

- 5.10.3.18 The entirety of the original submission is within single ownership and the Council has a signed SoCG with the promoters for this site that indicates both parties are content with the allocation as proposed.

5.11 Briston

5.11.1 Are the detailed Settlement Boundaries for Briston, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

5.11.1.1 Yes, settlement boundaries and the various policy area designations for Briston are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.

5.11.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.

5.11.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Briston. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Residential Areas** are the residual area of all other policy area designations and site allocations.

5.11.2 Are the housing allocations for Briston the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

5.11.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.

5.11.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts

of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.11.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.11.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.11.2.5 In Briston, the location of site options has been carefully considered to avoid significant expansion of Briston and Melton Constable beyond their natural boundaries and to avoid adverse impacts on the road network. Neither Briston nor Melton Constable have any significant environmental designations, and very little opportunities for infill, therefore sites suitably located in the countryside are needed to provide the required growth.
- 5.11.2.6 Discounted sites were not chosen for a number of reasons, including their scale in relation to either village and their proximity to local services and facilities that are scattered across both villages therefore sites located more centrally were preferred. Sites that assessed to the east and south south-east of Briston were considered to be too intrusive into the wider landscape and poorly located to access services in Melton Constable or the west of Briston. In addition, sites were discounted where they could have an adverse impact on Conservation Areas or heritage assets within either village. The Council was mindful in selecting sites that could effectively mitigate their impacts on the highway network in some way and be well related to the network and public transport routes.
- 5.11.2.7 Both proposed allocations are considered to be the most suitable sites for development. They are located near existing services and facilities in both villages, they are adjacent to the primary school also, and are located centrally, see the Council's response to Question M in regard to the potential issues of coalescence, to which the Council believes it is not significant and has been effectively mitigated for BRI02 by the requirements set out in Criterion 1 and 9 of the site-specific policy. The assessment of both sites identified concerns in regard to highways impacts in relation to the school, the Council has addressed this through the requirement for both sites to address local car parking issues.

5.11.3 Land East Astley Primary School (BRI01)

A) Has the site been allocated previously, or is it a new allocation?

5.11.3.1 The proposed allocation, BRI01 is a new allocation in the Plan. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0766), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.11.3.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.11.3.3 BRI01 is in single ownership, the site is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.11.3.4 BRI01 proposes a residential development of approximately 25 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2026/27 with development progressing over two years until 2027/28. Possible development of the site has been subject to pre application discussions and liaison with the Parish Council. The owner indicates a likely application during 2024 and is a developer. On site nutrient mitigation can be provided.

L) Does the requirement for school parking meet the tests in NPPF paragraph 57?

5.11.3.5 The assessment of both proposed allocations, BRI01 & BRI02 identified concerns regarding their impact on the highway network, especially given their location immediately adjacent to the school and the additional car flow that would exacerbate an existing issue in relation school during the drop off/pick up period whereby Fakenham Road can become quite congested.

5.11.3.6 The provision of this requirement through the proposed allocations does not adversely impact the existing parking arrangements, rather, this is a mechanism for providing new community infrastructure to alleviate an existing need which could be adversely impacted upon by additional development unless otherwise mitigated. The assessment of both sites in the Site Assessment Booklet for Briston [D10] finds them to be sustainable and suitable for development except for their impact on the highway network in regard to the school, if this is not mitigated through the implementation of the proposed car park or alternative measures, then the development of either site cannot be considered acceptable. The provision of a car park does not impact the site’s ability to deliver the required

housing for Briston and is appropriate in regard to scale which can be explored further through the application and master planning process.

M) Are Briston and Melton Constable considered to be two settlements, and if so, is physical coalescence of settlements an issue?

5.11.3.7 Yes, Briston and Melton Constable are two separate settlements. The Council's Settlement Hierarchy as shown in the Plan and justified within Background Paper 2, Distribution of Growth [C2], identifies Briston and Melton Constable as a singular service village due to the provision of different services and facilities that are present in both settlements that the residents of each share and use regularly, for example, the doctor's surgery is located in Melton Constable but the Primary School is in Briston.

5.11.3.8 The Authority considers that the proposed allocation, BRI01 will not cause physical coalescence as it is entirely within the Briston parish and is largely surrounded by existing development.

5.11.4 Land West Astley Primary School (BRI02)

A) Has the site been allocated previously, or is it a new allocation?

5.11.4.1 The proposed allocation, BRI02 was previously allocated in the adopted Site Allocations Development Plan (February 2011) as, BRI02. The new proposed allocation is the same site in regard to its extent. The site was included within the Call for Sites process in January 2016 as a larger submission (HELAA Ref – H0767), the details of which are set out in the Council's HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.11.4.1 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.11.4.1 BRI02 is in single ownership, the site is being brought forward by an agent with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.11.4.1 BRI02 proposes a residential development of approximately 40 dwellings which is deliverable in the Plan Period. The Council's most up-to-date housing trajectory provided within the Council's latest Five-Year Housing Land Supply Statement

[EX007] lists the site as commencing development from 2026/27 with development progressing over two years until 2027/28. Possible development of the site has been subject to pre application discussions and liaison with the Parish Council. The owner indicates a likely application during 2024 and is a developer. On site nutrient mitigation can be provided.

L) Does the requirement for school parking meet the tests in NPPF paragraph 57?

5.11.4.1 The assessment of both proposed allocations, BRI01 & BRI02 identified concerns regarding their impact on the highway network, especially given their location immediately adjacent to the school and the additional car flow that would exacerbate an existing issue in relation school during the drop off/pick up period whereby Fakenham Road can become quite congested.

5.11.4.1 The provision of this requirement through the proposed allocations does not adversely impact the existing parking arrangements, rather, this is a mechanism for providing new community infrastructure to alleviate an existing need which could be adversely impacted upon by additional development unless otherwise mitigated. The assessment of both sites in the Site Assessment Booklet for Briston **[D10]** finds them to be sustainable and suitable for development except for their impact on the highway network in regard to the school, if this is not mitigated through the implementation of the proposed car park or alternative measures, then the development of either site cannot be considered acceptable. The provision of a car park does not impact the site's ability to deliver the required housing for Briston and is appropriate in regard to scale which can be explored further through the application and master planning process.

M) Are Briston and Melton Constable considered to be two settlements, and if so, is physical coalescence of settlements an issue?

5.11.4.1 Yes, Briston and Melton Constable are two separate settlements.

5.11.4.1 The proposed allocation, BRI02, could cause further physical coalescence which has already occurred over a number of years. To assist in mitigating this potential impact, the site-specific policy for BRI02 includes in Criterion 1 which requires development to be set back from Fakenham Road in addition to appropriate landscaping and design. The authority considers that given the prevailing character of the area any coalescence will not be significant and can be mitigated through careful design and layout as required in the policy.

5.12 Ludham

5.12.1 Are the detailed Settlement Boundaries for Ludham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

- 5.12.1.1 Yes, settlement boundaries and the various policy area designations for Ludham are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.
- 5.12.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.12.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Ludham. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas**, and **Local Green Space** designations). **Residential Areas** are the residual area of all other policy area designations and site allocations.
-

5.12.2 Are the housing allocations for Ludham the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.12.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.12.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and throughout the process the potential social, economic, and environmental impacts

of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.12.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered 'in-fill' within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan's general allowance for windfall developments.
- 5.12.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA's Assessment Matrix.
- 5.12.2.5 In Ludham, the location of sites has been carefully considered in order to avoid significant expansion of the village beyond the identified settlement boundary and to mitigate the potential impacts on designated landscape assets. The Environment Agency advised the Council that there are constraints at the Ludham Water Recycling Centre however, a schedule to provide investment is set out in Anglian Water's long term planning Framework, this is explored further in the Council's Infrastructure Delivery Plan [I3.1]. Anglian Water advised that where possible, development should be limited and shared across sites, this has been taken into account and considered in the assessment of sites.
- 5.12.2.6 Discounted sites were not chosen for a number of reasons. Sites were discounted where they had an adverse impact on the Norfolk Broads and landscape more generally, and those sites that were poorly located to the services in Ludham and its built form. Development options are also limited by the flood zone to the south of the village.
- 5.12.2.7 The assessment of sites in Ludham concluded that three sites are suitable and available for development, LUD01, LUD01/A and LUD06. LUD01 is the largest of these sites and it was decided that a site of this scale is not necessary and would lead to an overdevelopment of the need required in the village, therefore LUD01/A was preferred. LUD06 is an existing allocation that remains within the Council's Trajectory and will come forward towards the latter half of the Plan Period

5.12.3 Land South of School Road (LUD01/A)

A) Has the site been allocated previously, or is it a new allocation?

- 5.12.3.1 The proposed allocation, LUD01/A is a previously adopted allocation from the currently adopted Site Allocations Development Plan (February 2011) as, LUD01.

The new proposed allocation is the same site in regard to its extent. The site was included within the Call for Sites process in January 2016 as a larger submission (HELAA Ref – H0903), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.12.3.2 Yes, the site does have planning permission from the below application:

PF/19/0991 (June 2019) – Erection of 12 dwellings with associated access from Willow Way, footpath to School Road, open space, landscaping, and parking. This application was approved February 2022.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.12.3.3 The proposed allocation has planning permission as shown in response to Question B.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.12.3.4 The proposed allocation has planning permission from the application referenced in response to Question B, the site has yet to commence development but is listed in the Council’s latest Trajectory [EX007] as commencing development in the 2026/27 period.

L) As part of a larger field, how has the site boundary been determined?

5.12.3.5 Ludham is identified as a Large Growth Village in the settlement hierarchy but the quantum of growth required in this tier is relatively small. Large scale growth is not required to achieve the overall housing target in the plan and although a larger area has been promoted the Council considers that this would risk unacceptable landscape impacts on this sensitive edge of village location. The boundaries identified align with the existing allocation and the extent of the planning permission.

5.12.4 Land at Eastern end of Grange Road (LUD06/A)

A) Has the site been allocated previously, or is it a new allocation?

5.12.4.1 The proposed allocation, LUD06/A is a previously adopted allocation from the currently adopted Site Allocations Development Plan (February 2011) as, LUD06. The new proposed allocation is the same site in regard to its extent. The site was

included within the Call for Sites process in January 2016 (HELAA Ref – H0908), the details of which are set out in the Council’s HELAA [D13-D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.12.4.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.12.4.3 LUD06/A is in single ownership, the site is being promoted by the landowners with intention of developing the site in the near future, towards the latter half of the Plan Period.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.12.4.4 LUD06/A proposes a residential development of approximately 15 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2032/33 with development progressing over two years 2033/34. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) As part of a larger field, how has the site boundary been determined?

5.12.4.5 The boundary of the proposed allocation is based on a general assumption of the necessary required land to deliver housing and associated infrastructure and other site-specific policy requirements.

5.12.4.6 The promoters of the site submitted a larger site area to the Council through the Call for Sites process as part of the HELAA [D13 & D15] (H0908). The Council’s assessment of this site as shown in the Site Assessment Booklet for Ludham [D11] found through the site assessment process that only part of the total site area, the area previously allocated as LUD06 in the Core Strategy, was available for development. The site boundary reflects the boundary adopted by the Core Strategy for LUD06.

5.13 Mundesley

5.13.1 Are the detailed Settlement Boundaries for Ludham, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the Plan) suitable and justified given their policy function?

- 5.13.1.1 Yes, settlement boundaries and the various policy area designations for Mundesley are suitable and justified. The policy function of the boundaries and the various land use designations is described in para 9.1.4 - 9.1.8 of the Submission Plan. Each of the designations reflects the defining characteristics of the designation and the boundaries denote where a change of character (land use) occurs.
- 5.13.1.2 A desktop review was carried out in relation to settlement boundaries proposed for Large Growth Towns, Small Growth Towns and Large Growth Villages. Settlement 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 considered, updated and aligned boundaries to incorporate proposed policy area designations, existing site allocations, and proposed site allocations in the submitted Local Plan to ensure the Policies Map is up to date.
- 5.13.1.3 While some policy area designations required desktop review, in other cases a more detailed assessment was undertaken which provided the basis for adjustment of policy area boundaries within Mundesley. This included Background Paper 3: Approach to Employment [C3] (in relation to **Employment Land** designations) and Amenity Green Space Study [G13] (in relation to **Open Land Areas, Formal Education & Recreation Areas, and Local Green Space** designations). **Residential Areas** are the residual area of all other policy area designations and site allocations.
-

5.13.2 Are the housing allocations for Mundesley the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

- 5.13.2.1 Yes, all proposed allocations identified in the Plan are the most appropriate when considered against reasonable alternatives. The assessment process as detailed in the HELAA [D13] and Site Selection Methodology Background Paper [C6] explores how sites were tested, and how those found to be unsuitable, unavailable and/or undeliverable were not considered for allocation. Where constraints were identified in either of the three tests mentioned above, the Council took into consideration through the assessment of each site if and how these constraints could be overcome with appropriate mitigation.
- 5.13.2.2 The RAG Assessment Matrix shown in each Site Assessment Booklet [D1-D12] provides a visual summary of the assessment outcome for each site as assessed through the Sustainability Appraisal, which identified at an early stage and

throughout the process the potential social, economic, and environmental impacts of sites, plans and strategies. The SA used a detailed assessment framework that identified sites as having a positive, neutral, or adverse effect when tested against different criteria. The Matrix indicates that any sites that were given a red score in the SA against any of the criteria was not considered further.

- 5.13.2.3 There are a range of factors which influence the potential location of development, including environmental, landscape impacts and the need to take into account available infrastructure. In addition, sites that could be considered ‘in-fill’ within settlement boundaries were not progressed as allocations as possible redevelopment of such areas has already been accounted for separately in the Plan’s general allowance for windfall developments.
- 5.13.2.4 The Site Booklets for each settlement provide assessments of every site that progressed past the initial assessment of suitability, availability, and deliverability, and includes further review of these sites with the addition of input from the SA’s Assessment Matrix.
- 5.13.2.5 In Mundesley, there are a range of factors which influence the potential overall numbers and suitable location of development in Mundesley including: availability of land, highways impacts and environmental and landscape considerations. The suggested scale and location of development has sought to balance the need for growth with the protection of the setting of Mundesley.
- 5.13.2.6 Discounted sites were not chosen for a number of reasons, including the impact development could have on the landscape given that parts of the settlement are elevated and exposed in the wider landscape. Sites with adverse impacts on highways, poor access and would adversely affect the cumulative network were not considered. Additionally, a couple of sites were located at either end of the settlement, poorly situated to the services and facilities that are located more centrally. A collection of sites is located more centrally, where the proposed allocation is situated however, three of these sites were withdrawn prior to Regulation 18 by the site promoter and were not assessed further.
- 5.13.2.7 The proposed allocation is the most suitable site development in Mundesley. It is well situated within the built form of the settlement and its services. The Sustainability Appraisal and Historic Impact Assessment identified some concern over the site’s impact on the setting of the Grade II listed Church near to the site however, this constraint effects all sites in this area, only three sites could potentially avoid this constraint due to their location and these were all considered unsuitable for development due to other issues. Additionally, the Council has sought to mitigate this by reducing the scale of development from 50 dwellings (as proposed at Regulation 18) down to 30 dwellings and provide requirements in the site-specific policy in regard to appropriate landscaping and design.

5.13.3 Land off Cromer Road & Church Lane (MUN03/B)

A) Has the site been allocated previously, or is it a new allocation?

5.13.3.1 The proposed allocation, MUN03/B is a new allocation in the Plan. The site was included within the Call for Sites process in January 2016 (HELAA Ref – H0150), the details of which are set out in the Council’s HELAA [D13 - D16].

B) Does the site have planning permission and/or are there current applications under consideration? If so, please list.

5.13.3.2 The site does not have planning permission, there have been no applications for this proposed allocation.

H) What is the land ownership position and is the site currently being promoted by a developer?

5.13.3.3 MUN03/B is in single ownership, the site is being brought forward by the landowner with the intention of negotiating with potential developers in the near future.

K) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council’s updated housing trajectory realistic? Has the landowner/developer confirmed this?

5.13.3.4 MUN03/B proposes a residential development of approximately 30 dwellings which is deliverable in the Plan Period. The Council’s most up-to-date housing trajectory provided within the Council’s latest Five-Year Housing Land Supply Statement [EX007] lists the site as commencing development from 2025/26 with development progressing over two years 2026/27. The Council has engaged with all site promoters where possible and necessary throughout the Plan making process and have not been informed of any major concerns from promoters in regard to the expected delivery of their site.

L) Does the requirement for a new pedestrian and cycle route that uses the former railway embankment meet the tests in NPPF paragraph 57?

5.13.3.5 The provision of this requirement is being implemented in order to provide for a new local improvement in regard to green infrastructure and access to green spaces. This requirement is not necessary to make the development acceptable in planning terms but is necessary in assisting the Plan in achieving its Strategic Aims and Objectives (No. 5) in regard to delivering healthy communities and the encouragement towards creating a network of accessible formal or informal green spaces and improve connectivity in Mundesley. The land needed for this requirement is within the same ownership and already assessed by the Council for possible development as part of a larger site, it is not extensive in comparison to the proposed allocation and presents an opportunity to connect the site to the wider green space around it.