



Report to North Norfolk District Council

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE NORTH NORFOLK SITE SPECIFIC
PROPOSALS**

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 5 March 2010

Examination hearings held between 20 July and 4 August 2010

File Ref: PINS/Y4620/429/4

ABBREVIATIONS USED IN THIS REPORT

AA	Appropriate Assessment
AONB	Area of Outstanding Natural Beauty
CA	Conservation Area
CPRE	Campaign to Protect Rural England
CS	(North Norfolk) Core Strategy, adopted 2008
Doc	Document (as numbered in Examination library)
DMPO	Development Management Procedure Order (2010)
DPD	Development Plan Document
EA	Environment Agency
EEP	East of England Plan (revoked 2010)
FRA	Flood Risk Assessment
Ha	Hectare
IC	Inspector Change
KC	Key Change (proposed by Council before DPD submission)
Km	Kilometre
LDF	Local Development Framework
LDS	Local Development Scheme
LHA	Local Highways Authority
LP	Local Plan
MM	Minor Modification (proposed by Council before DPD submission)
PDL	Previously Developed Land (as defined in PPS3)
PM	Proposals Map
PPS	Planning Policy Statement
PS	Principal Settlement (as defined in the LDF: Cromer, Holt, Fakenham, North Walsham)
RSPB	Royal Society for the Protection of Birds
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SPA	Special Protection Area
SS	Secondary Settlement (as defined in the LDF: Hoveton, Sheringham, Stalham, Wells)
SSP	Site Specific Proposal
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Drainage System

Non-Technical Summary

This report concludes that the North Norfolk Site Specific Proposals Development Plan Document provides an appropriate basis for the planning of the District over the next 15 years. The Council has sufficient evidence to support the proposals and can show that they have a reasonable chance of being delivered.

One change is needed to meet legal and statutory requirements. This can be summarised as follows:

- Deletion of proposed housing allocation on land south of Cromer Road, Holt and its replacement by a new allocation on land west of Woodfield Road, Holt.

The change does not alter the thrust of the Council's overall strategy.

Introduction

- i. This report contains my assessment of the North Norfolk Site Specific Proposals Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004.
- ii. The report considers whether the DPD is compliant in legal terms and whether it is "sound". Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
- iii. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft DPD (March 2010) which is the document published for consultation in June 2009¹, together with the Council's KCs² and MMs³.
- iv. My report deals with any changes that are needed to make the DPD sound, as identified in bold in the report. The one change that I recommend is set out in Appendix A. This change does not materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken.
- v. Some of the changes (MMs) put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not relate to soundness they are generally not referred to in this report although I endorse the Council's view that they improve the plan.
- vi. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
- vii. Where the Council has proposed changes that go to soundness (i.e. the proposed KCs) they have been subject to public consultation and I have taken the consultation responses into account in writing this report.

¹ Doc A1.1

² Doc A1.3

³ Doc A1.4

Assessment of Soundness

Preamble

1. This part of the report focuses on the PPS12 requirement that to be sound a DPD should be justified, effective, and consistent with national policy. "Justified" in this context means that a DPD should be founded on a robust and credible evidence base and should adopt the most appropriate strategy in the light of prevailing circumstances. "Effective" means that the DPD should be deliverable, flexible and able to be monitored. "Consistent with national policy" is self-explanatory.
2. For ease of understanding I consider soundness with reference to a number of issues/questions. These are set out under the Main Issues section below. But first I consider the implications of the Secretary of State's recent decision to revoke all RSSs with immediate effect, and the revisions to PPS3. Thereafter I consider in turn my findings on the Inspector's questions put to the hearings, the site specific proposals identified in the DPD which raise soundness issues, and the question of omission sites (i.e. sites/proposals not included in the submitted DPD, but promoted for inclusion by other parties).
3. *Revocation of Regional Spatial Strategies:* On 27 May 2010, shortly before the hearings in respect of this DPD were held, the Secretary of State set out his intention rapidly to abolish RSSs. Prospective participants at the hearings were invited to submit any views on this matter in writing by 30 June, with any further statements in response to the Inspector's questions.
4. In the event no detailed written comments have been put forward other than the Council's committee report and decision⁴ responding to this new issue. Briefly, this indicates that the Council will continue to apply the 8,000 net additional housing figure set out in the EEP and the adopted CS for the purposes of this DPD. Subsequently the Government's position in respect of RSSs was clarified in that as from 6 July such strategies were revoked with immediate effect. Although this revocation was later quashed in the High Court, the intention to abolish RSSs remains and will be given statutory effect in due course.
5. While I understand that the proposed abolition of RSSs is likely to delay or disrupt the adoption of some DPDs, that of the EEP does not appear to raise any immediate issues for the North Norfolk Site Specific Proposals DPD. The Council is firmly of the view that there is no need to review or revise the DPD to take account of the revocation, (other than to delete any references to the EEP) and I agree with that. The Council notes, in particular, that the CS⁵ housing figure was taken

⁴ Doc A1.25

⁵ Doc G10

directly from the EEP, and was indeed the figure it had itself originally promoted. In the Council's view, it remains wholly appropriate for housing supply purposes, including the provision of an adequate supply of affordable housing. From all the evidence available to the examination, I have no good reason to take any other view, and none has been put to me. Therefore I find that it is appropriate to consider the soundness of the DPD on that basis.

6. *PPS3 revisions:* In addition to the proposed revocation/abolition of RSSs, I note the revisions to PPS3 (Housing) that were announced by the Government shortly before the DPD hearings took place. These concerned principally the re-definition of garden land (more specifically, private residential gardens) to take it outside the definition of PDL in Annex B to the PPS, and the removal of the previous national indicative minimum density requirement for new residential development.
7. I note that CS policy HO7 states minimum density requirements, consistent with the previous version of PPS3, although none are referred to in the Site Specific Proposals DPD. The deletion of the previous national indicative figure (of 30 dwellings/Ha), has no obvious implications for the DPD that have been brought to my attention, and I am not aware of any. Similarly, the new definition of garden land in PPS3 has no significant implications for the DPD. Accordingly, no changes to the DPD appear to me to be necessary to take account of the aforementioned revisions to PPS3.
8. *Other national policy revisions:* The main new statements of national planning policy published after submission of the DPD include PPS5, *Planning for the Historic Environment*. I refer to this briefly in this report, and in my report on the Council's Single Policy Review (Conversion and Re-use of Rural Buildings as Dwellings) DPD, into which I held an examination hearing on 5 August 2010. I would also note the publication of The Town and Country Planning (Development Management Procedure) Order 2010, which replaces the 1995 General Development Procedure Order. Among other things, this codifies the current requirements for making and determining planning applications.

Main Issues

9. The examination hearings were structured in 2 parts: first, general matters, which were discussed on days 1-2; and then site specific proposals at individual settlements, which were considered on days 3-8.
10. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have

identified some 15 main issues, in the form of questions. The questions are deliberately couched in broad-brush terms, so as to embrace the Council's own Summary of Main Issues⁶. I regard the answers to these questions, collectively, as key to the overall soundness of the DPD. Many of them lend themselves to a broad "Yes/No" answer, as indicated below.

Issue 1 – Is the DPD legally compliant?

11. Answer - Yes. (Details are given below, under Legal Requirements). So far as this matter is concerned, the DPD is sound.

Issue 2 – Are the draft allocations, collectively, consistent with national policy, particularly in PPS3 (Housing) and PPS4 (Planning for Sustainable Economic Growth)?

12. A – Yes. The DPD was evidently drafted with the requirements of PPS3 fully in mind throughout, and, in short, I find nothing in it which conflicts with PPS3 policies or advice. Nor was any such conflict alleged either at the hearings, or in written submissions.
13. There is no need here to cite chapter and verse, but I have studied and noted the contents particularly of the Council's SHLAA, its Five Year Land Supply statements, and Housing Trajectories⁷. None of these is persuasively challenged in any other representations, either in their conclusions or as regards their detailed statistics/data bases.
14. I am satisfied that the DPD allocations will meet the PPS3 5-year housing land requirement, with sufficient deliverable (i.e. available, suitable and achievable) housing sites over the period 2011-2016. And, again in the absence of any persuasive evidence to the contrary, I consider that there is a reasonable prospect of the remaining allocated housing (and other) sites being developed within the longer time period of 15 years (to 2026).
15. PPS4 was published only a few months before the DPD was submitted. Nevertheless, again I find no significant points of conflict. The same applies to PPS5 - which is even more recent - on *Planning for the Historic Environment*.
16. There was a suggestion from some quarters⁸ that some, or possibly all of the draft housing allocations in the Norfolk Coast AONB conflict with the advice in paras. 21-22 in PPS7, *Sustainable Development in Rural Areas*. I agree that this matter merits close scrutiny, but in the final analysis I accept the Council's case for proposing these allocations.

⁶ Doc A1.2

⁷ See under Docs F4.

⁸ notably, the Norfolk Coast Partnership and CPRE Norfolk

17. While the AONB designation certainly implies a strong constraint upon new housing development, it does not (unlike, most notably, Green Belt policy) very largely preclude it. Several settlements in North Norfolk are either within the AONB, or are entirely or largely surrounded by it, and if their housing needs are to be met, as anticipated by the adopted CS, some allocations within it must be made. It goes almost without saying that those few should be in the least sensitive locations, generally on the urban fringe or within existing settlement boundaries.
18. I return to this important matter below (see Issue 7), and in relation to a few individual draft allocations at Cromer, Sheringham and Wells. I find that all the allocations are justified, given the housing and other needs, the general suitability and sustainability of the sites, the absence of preferable alternative sites, and the limited landscape impacts (plus opportunities for mitigation) of developing the sites in question.
19. Few other statements of national policy were mentioned at the hearings or in written representations, and in my own deliberations I have found no instances of any significant, much less serious conflict.
20. It follows that, so far as this matter is concerned, the DPD is sound.

Issue 3 – Do the draft allocations conform generally with the regional spatial strategy (East of England Plan⁹)?

21. A – Yes, as a matter of fact, but the question has been overtaken by events. (This is because of the Government's firm intention to abolish RSSs, including the EEP, as mentioned above). That said, I will only add that in my opinion the DPD is fully consistent with the CS (see also below), which in turn is/was in general conformity with the EEP.

Issue 4 – Will the draft allocations deliver the stated objectives of the North Norfolk Core Strategy?

22. A – Yes. This matter is succinctly dealt with in the Council's statement¹⁰ and I see no need to rehearse it in detail. I agree with the Council that the DPD has been prepared to accord with the vision, core aims and objectives of the CS, and the distribution and scale of its allocations is consistent with its spatial strategy and settlement hierarchy. No other party has argued convincingly that the DPD will fail to contribute to the delivery of any of the CS objectives. In general, I find the DPD amply consistent with the CS, both in its broad principles and in its details.
23. It follows that, so far as this matter is concerned, the DPD is sound.

⁹ Doc D5

¹⁰ Doc J2.2.i

Issue 5 – In the light of the Core Strategy, has the correct/appropriate amount of development been allocated within the DPD and in each settlement?

24. A – Yes, within acceptable limits. Policy SS3 in the CS sets out housing numbers within ranges to be delivered by way of new allocations at all the individual PSs, SSs, and in the service villages and other areas. For the most part, the SSPs in the DPD are within those ranges¹¹. The main exception is a slight shortfall in Cromer and Sheringham, but this is compensated for by a slight increase at Holt, which is closely linked geographically and functionally with those 2 towns. I agree with the Council that the slight excesses in allocated dwelling numbers at Bacton, Little Snoring, Overstrand and Roughton, compared with the CS numbers, reasonably reflect the capacity of those settlements and the allocated sites.
25. It follows that, so far as this matter is concerned, the DPD is sound.

Issue 6 – Is it essential to make so many greenfield allocations, both at the towns and the villages, or are there preferable PDL alternatives, at least to the smaller sites?

26. A – Yes, it is essential. The CS aims to ensure that some 60% of the planned 8,000 additional dwellings (to 2021) in North Norfolk will be on PDL, but this proportion seems unlikely to be exceeded. Allocation sites will comprise about 40% of the dwelling target and are a mix of both PDL and Greenfield.
27. The Council has made the point that North Norfolk is the most rural district in Norfolk, and perhaps in the east of England as a whole. Thus it lacks any large urban areas; according to the CS, the largest settlement, North Walsham, only has a population of about 12,100. It follows from this that compared with many other districts there is relatively little PDL in “sustainable” (i.e. accessible urban) locations. Thus, when I first began the examination, I was struck by the large number of greenfield sites among the allocations, mainly on the edges of PSs, SSs, and larger villages. At the time of writing, most of these remain in active agricultural use, while some are old orchards etc, now apparently no longer productive. The question clearly arose as to whether there might be preferable and sustainable PDL alternatives, at least to some of those sites.
28. Having now read the evidence, and having visited almost all the settlements and sites in question, I am satisfied that this level and number of greenfield allocations must be made to meet overall housing requirements, owing to the paucity of PDL sites which are not themselves already committed or allocated for housing in the DPD.

¹¹ See esp. tables 1 and 2 in Doc J2.2.i

29. There have been a number of representations in favour of making housing allocations on land designated on the PM as employment areas¹² (subject to CS policy SS5), but, in short, I accept the Council's case that these should all be retained as such. This is based both on the need to retain adequate reserves of such employment land¹³ over the lifetime of the plan - which, I have assumed, will long outlast the recent recessionary downturn in the national economy - and because of its inherent suitability for employment generating uses.
30. Thus, for example, I am not recommending that the site listed¹⁴ as CAT09, in the Catfield Industrial Estate, should be allocated for housing in place of the DPD's allocated greenfield site, CAT01 (Land off Lea Road), despite several representations to that effect. Nor, to cite another example, am I recommending the substitution¹⁵ of the vacant factory site (listed as F09) at Parker Drive, Fakenham, for any part of the large greenfield allocation at that town. This is because both of these formerly active employment sites are well located, and remain suitable in all other respects, for some form of new employment development in the future.
31. So far as this matter is concerned, I am satisfied that the DPD is sound.

Issue 7 – Is it necessary to allocate sites in/affecting the Norfolk Coast AONB?

32. A – Yes. I have already referred to this matter, in the context of an alleged conflict with national policy in PPS7. Para. 21 of the PPS says that planning policies (for AONBs) should “support suitably located and designed development necessary to facilitate the economic and social well-being of these designated areas and their communities, including the provision of adequate housing to meet identified local needs”. I take this as a forward-looking reference to the identified needs in policy SS3 of the CS, which is the source for the housing numbers in this DPD. These include numerical ranges for housing allocations at Cromer, Sheringham, Wells and other settlements¹⁶ which are contained within, or are surrounded by the AONB.
33. Thus PPS7 allows in principle for housing to be built in the AONB, and the CS indicates the quantum, depending, of course, on the availability and preferability of alternative sites (i.e. those outside the AONB). Nevertheless, as PPS7 reminds us, “the conservation of the natural beauty of the landscape and countryside should... be given great weight” in all planning decisions in these areas.

¹² some of which is PDL

¹³ See esp. Docs F15, F16

¹⁴ i.e. in the SHLAA

¹⁵ The case for this is made in Doc J2.5.iv

¹⁶ Blakeney, Weybourne, Southrepps, Mundesley

34. I note that para. 22 of PPS 7 refers to "major" developments, which, it advises, "should not take place (in AONBs) ...except in exceptional circumstances". The PPS does not define the term "major" in this context, apart from noting that it "includes major development proposals that raise issues of national significance". It does not say that it only includes nationally significant proposals. Despite the slight ambiguity, or vagueness of this phraseology, I do not regard the relatively modest housing allocations in the AONB as representing major development by any definition (except perhaps that in the DMPO); they certainly cannot be said to raise issues of national significance. It follows, I think, that the advice in para. 22 does not apply to them.
35. I have borne these points in mind when considering all the housing allocations in the DPD which are either within, or affect, the Norfolk Coast AONB. I have concluded that all of them are acceptable in terms of their impacts on the AONB, and in the overall planning balance.
36. It follows that, so far as this matter is concerned, the DPD is sound.

Issue 8 – Do any of the draft allocations have unacceptable impacts on/implications for designated European, national or local wildlife sites?

37. A – No. The AA¹⁷ confirms that, provided mitigation measures are implemented, there will be no adverse impact of any of the draft allocations on the integrity of any international (European) sites - i.e. those that form part of the Natura 2000 network, plus Ramsar sites). At the examination hearing, both Natural England and the RSPB (organisations most directly concerned with wildlife conservation) agreed with that, subject to the inclusion of further MMs 02 and 03.
38. I have reached the same conclusion in respect of all the designated national (e.g. SSSIs) and local nature conservation sites in North Norfolk. While there would inevitably be some impact on wildlife (whether animals, birds or plant species) from development on most sites, including on some protected species (e.g. bats, badgers) this would in all cases be capable of acceptable mitigation, achievable through the use of appropriate planning conditions and/or obligations. I have assumed that mitigation strategies and detailed proposals would be negotiated in the normal way during the planning application process.
39. In fact, the vast majority of allocated sites are either PDL within existing built-up areas, which generally have very little ecological interest or value, or are on cropped farmland, where the same often applies. Several of the sites present opportunities not merely for

¹⁷ Doc G28

mitigation, but for ecological enhancement. This can be achieved through, for example, the design and implementation of new woodland, landscaped and other open areas, small wetlands or other water features, and new planting, all of which can help in the creation of new wildlife habitats and the protection of existing biodiversity.

40. I note the results of both the sustainability appraisal and other preliminary work done for the Council, together with a number of site specific ecological surveys and studies submitted by site agents. None of these gives me any great cause for concern regarding the protection and conservation of biodiversity in North Norfolk in general, nor on any of the allocated sites.

41. It follows that, so far as this matter is concerned, the DPD is sound.

Issue 9 – Are the individual draft housing allocations available, suitable and achievable (i.e. deliverable), in the terms of PPS3, such as to deliver a 5 year land supply?

42. A - Yes. Despite the difficult conditions in the housing market in recent times - which persist at the time of writing - the draft DPD (and the Council's officers at the examination hearings) is very confident about the deliverability of its allocated sites. In general I find this amply supported by the relevant documentation. In several instances, this includes technical reports by agents supporting a particular allocation. While I have read all of these, I see no need to refer to them further in this report.

43. By contrast, I have read or heard very few claims that the allocated sites are not deliverable. Most respondents take no particular view on this matter. Instead, there are various suggestions that a particular site is not suitable, based on a conventional array of planning objections. While I have considered all of these - and of course it is a truism that no allocated site is "perfect", or entirely neutral in effect, since all will have impacts of one sort or another - there are only a few sites where such objections render a draft allocation, in my opinion, seriously questionable (to the point of "unsoundness"). I consider those sites below, in the following section.

44. With that holding proviso, so far as this matter is concerned, I find the DPD sound.

Issue 10 – Is there a reasonable prospect of the remaining allocations being developed within 15 years?

45. A – Yes. On this matter, there is really, to coin a phrase, only one convincing narrative – the Council's. From its apparently painstaking and thorough investigations with landowners and their agents etc, it is satisfied that all the draft allocations are deliverable within the plan period. I accept that, as I have no substantial contrary views to assist me. Indeed, no one at any of the examination hearings said that a completed development could not be delivered on any allocated site, at least by the middle or later years of the plan.

46. It follows that, so far as this matter is concerned, the DPD is sound.

Issue 11 – Are the other draft allocations (employment, retail and other) appropriate and deliverable, and consistent with PPS4? If not, why not, and does that make the DPD unsound?

47. A – Yes. Rather unexpectedly, I have read and heard almost no views on this question, other than the Council's. These non-residential allocations in the DPD do not therefore appear to be controversial. In a few cases (such as site ED2, Cromer football club, Mill Road) I consider that various uncertainties¹⁸ can be resolved satisfactorily by pre-application negotiation/discussion.

48. I am aware that, during this examination, there has been, simmering in the background, a public debate as to which current planning application including a new foodstore should be allowed at Sheringham. Since, as I understand it, neither of the proposed sites is allocated in this DPD, and is not an omissions site, I take no view on the matter (and certainly not on the respective merits of the different national retailers involved).

49. As far as this matter is concerned, the DPD is sound.

Issue 12 – (With reference to sustainability appraisal) Are the draft allocations sustainable?

50. A – Yes. As required by the regulations, all the draft allocations have been subject to detailed appraisal, including SA¹⁹. Although these appraisals are not above criticism or subsequent fine-tuning, I find them in general amply reliable and robust for the purposes of this DPD examination. And, also in general²⁰, they show to my satisfaction that as far as sustainability is concerned, the best sites have been selected, in accordance with the CS strategy and its housing numbers.

51. There are of course instances where the sustainability scores²¹ are disputed, but usually only by small, even trivial margins. And there is also the possibility, indeed the likelihood, that the scores could change over time. Thus they are not written on tablets of stone. But there are almost no instances where, in my view, the Council has so misjudged an allocated site's overall or "total" sustainability as to render that allocation unjustified, and thereby unsound.

52. Therefore, as far as this matter is concerned, the DPD is sound.

¹⁸ Such as those raised about ED2 by the football club trustees

¹⁹ See Docs A1.5 and A1.6

²⁰ The chief exception is site H15 at Holt

²¹ Whether the specific impact scores or the total scores for individual sites

Issue 13 – Are any of the draft allocations subject to any demonstrable and overriding infrastructure constraints (particularly water/sewerage/drainage; education, or highways) which cannot be overcome by planning conditions/obligations?

53. A – No. Potentially, overriding infrastructure constraints are crucial because they would throw serious doubt on the deliverability of a site allocation. But I have been impressed by the thoroughness with which the Council has investigated these matters, particularly in consultations with the main infrastructure providers.
54. The DPD refers briefly to these issues under each specific allocation, pointing out where known/potential problems need to be addressed before planning permission could be granted; nevertheless, no other party at the examination has convinced me that an identified problem amounts to an overriding constraint.
55. In particular, I am reassured by the Council's Water Infrastructure Statement²², which deals with a number of water-related issues across the district, and concludes that there are no overriding constraints that would render any allocations (including those at Fakenham and Holt) unsound. While further work is needed to deal with foul water drainage at those locations, there is a reasonable prospect of development given all parties' commitment to address the issue. This is backed up by the Council's statement for Day 2 of the examination hearings (Doc J2.2ib). I have not seen any persuasive rebuttal of this conclusion.
56. Similarly, I have no particular concerns about sewerage or drainage, or the ability of primary or secondary schools to provide school places to serve the proposed new developments.
57. While there are outstanding objections from the LHA to 2 proposed housing allocations (at North Walsham and Roughton²³), I believe that the problems it has identified can be satisfactorily overcome (see also below, under individual sites), such that the sites in question will be sustainable in transport terms, will not create unacceptable conditions on the local highways network, and can be safely and conveniently accessed.
58. It follows that, as far as this matter is concerned, the DPD is sound.

Issue 14 – Are any of the draft allocations unsuitable by reason of any environmental or residential amenity issues/objections?

59. A – No. Not surprisingly, this question has given rise to many comments and "objections" at the publication stage. As already noted,

²² Doc A1.11

²³ SSPs NW28a and ROU03/10 respectively

many of the allocated sites are greenfield sites, and, being on the outer edges of existing settlements, they tend to have existing dwellings and their curtilages either adjacent or in close proximity. It is understandable therefore, that those neighbours in particular might have concerns about the implications of development near them.

60. To assess this matter it has been necessary to visit all the sites in question, as well as hearing or reading what their supporters and objectors have said about them. But this report does not need to refer to them individually.
61. To generalise, therefore, I am satisfied that the Council has thoroughly appraised each site in terms not only of its overall "sustainability" (as previously mentioned), but also in terms of the likely impact of the proposal, both on the local environment, and on neighbours' residential amenities.
62. I find that all of the allocated sites have been carefully and painstakingly chosen, following appropriate consultations with the local community, with a view to minimising any potentially adverse impacts ("demonstrable harm"). Again, as with highways and traffic, I do not expect everyone to agree with that. Nevertheless, I have concluded that, while virtually no SSP in the DPD will have no environmental impact, or no effect on nearby properties, nearly all are amply justified in planning terms, and preferable to the suggested alternatives.
63. It follows that, as far as this matter is concerned, the DPD is sound.

Issue 15 – Are there any other good reasons, including the availability and deliverability of clearly preferable alternative sites (which have themselves been subject to sustainability appraisal and public consultation) why the draft allocations might be considered unsound?

64. A – No. With just one exception I do not propose to recommend any alternatives to the proposed allocation sites. I refer to this matter in more detail in the following section. As far as it is concerned, the DPD is sound.

Soundness issues raised by individual Site Specific Proposals

65. Although there were numerous representations on the draft DPD during the publication stage in June 2009, in my opinion few of them seriously challenge the soundness²⁴ of the plan overall. The majority object to, or just query, some aspect or aspects of an individual SSP, without raising any "show-stoppers" - fundamental matters of principle which would justify the deletion of the SSP, or a major change to it, and/or its replacement by an alternative proposal.

²⁴ as defined in PPS12

66. In this context I would add that under the previous development plans system (before the commencement of the Planning and Compulsory Purchase Act 2004) an Inspector's local plan inquiry report would have dealt with many of these objector representations in some detail. Not so under the current system, which is very strongly focused on the PPS12 tests of soundness.
67. For that reason, in the remainder of this section I only deal with a small number of sites where, on the basis of all the evidence to the examination, finely balanced judgements need to be made regarding their suitability for allocation.
68. The fact that there are so few of these is testimony to the thoroughness of the Council in preparing the DPD, and its willingness to listen to consultees in the early stages and take on board their views. It also underlines the rigour with which the Council's team explained and, where necessary, defended the DPD during the examination hearings.
69. Thus, satisfied that they are individually sound, I make no comment at all on the majority of the SSPs in the DPD. That includes relatively large scale proposals (for this district) such as F01 (Land north of Rudham Stile Lane, Fakenham); H09/12/21 (Land at Heath Farm/Hempstead Road, Holt); and NW01/04/05/06/07/30 (Land at Norwich Road/Nursery Drive, North Walsham) in the PSs, and HV03 (Land adjacent to doctors surgery, Stalham Road, Hoveton) and ST01 (Land adjacent to Church Farm, Ingham Road, Stalham) in the SSs.
70. I will now take the few exceptions in the order in which they appear in the DPD, dealing first with those in principal and secondary settlements, and then with just one in a service village. In each case, I refer to what I consider are the main planning issues, and then give my brief conclusions on those issues. I do not comment on what I regard as minor or irrelevant (non-planning) issues. I should emphasise that my conclusions refer only to the principle of allocating the site for the use and quantum of development indicated in the DPD, rather than to any specific form of development. That would fall to be addressed in a detailed planning application, normally following the adoption of the DPD.
71. *SSP CO4: Cromer – Land at rear of Sutherland House, Overstrand Road.* This proposed allocation raises the following main planning issues: principle of development close to a coastal erosion constraint area²⁵; principle of development in the AONB and in the undeveloped coast (CS policy EN3); sustainability of site; type and quantum of development; access and traffic generation; effect on nearby residential properties.

²⁵ such areas are subject to CS policy EN11

72. From all the available evidence, and my accompanied and unaccompanied site visits, my brief conclusions on these issues are as follows: the allocated site is some distance to the south west of the coastal erosion constraint area, as defined on the PM, which shows the area at risk of erosion up to 2105; and, from the indicative drawings²⁶, any built development would be even further removed from that area. Thus as a matter of fact there is no planning policy constraint, arising from the risk of coastal erosion, upon the proposed allocation. I have no good reason to take a more cautious approach to this matter, as if the constraint area were more widely defined than it is, and to do so would run the risk of inconsistency with my consideration of other sites in the DPD.
73. I have noted above my support in principle for allocations to be made within the Norfolk Coast AONB. This particular site falls within a portion of the AONB which projects westwards like a wedge into the built up area of Cromer, and which is therefore quite strongly affected by the nearby urban edge. It also (in my opinion, and in part for that reason) lacks any distinctive character or outstanding landscape quality of its own, and is not readily visible (much less conspicuous) in any long-distance or middle-distance views. It cannot be seen, for example, from the coast path linking Overstrand with Cromer. Unlike the adjoining woodland, it has no notable trees or structural vegetation. For these reasons development upon it would not significantly harm the integrity of the AONB, compared with development on other AONB locations around Cromer. Much the same applies to the undeveloped coast, an area designated under CS policy EN3, which in this immediate locality is partly coterminous with the AONB. The EN3 policy area boundary would need to be redefined to exclude the site, as proposed in the DPD.
74. No one seriously questions the sustainability credentials of the site, which is well and conveniently located in relation to Cromer town centre, its shops and services, schools and hospitals etc, and to public transport. This is well attested in the planning and transport consultants' reports submitted by Sutherland Homes.
75. While they, as prospective developers, have put a case for an allocation specifically for retirement homes - as opposed to general market (and affordable) housing - I support the draft allocation for "approximately 60" dwellings, unrestricted by age group, and subject to the normal CS affordable housing policy. This would be consistent with the other residential allocations in the DPD, but would not necessarily preclude an application on this site for special needs housing, such as retirement homes, if that were thought desirable on grounds (for example) of specific needs, or reduced traffic generation. Nevertheless, on that issue, I am satisfied that the traffic generated by

²⁶ submitted in library documents by Sutherland Homes Ltd.

the allocated level of development could be adequately and safely accommodated on the local road network, and that a suitable access to the site could be provided from Overstrand Road.

76. The nearest residential properties are in the relatively recent developments (Barclay Mews and Sutherland Court Gardens) to the west of the site, The Warren to the north (which is separated by a small woodland), and some more isolated, detached dwellings to the south. I am satisfied that, owing to the separation distances involved in every case, none of these would suffer any significant loss of residential amenity from the development of the site. This could be assisted by suitable planning conditions in any planning permission. While their views of the site would inevitably be affected, this would not by itself render the allocation unsound.
77. Various other matters are mentioned in representations, but in my view they, too, do not go to the soundness of the proposed allocation. In short, I support it.
78. *SSP H15: Holt – Land south of Cromer Road.* This proposed allocation raises the following main planning issues: site location and sustainability; transport and traffic; landscape impact; significance of site as "enabling development" at Greshams School; availability of preferable alternative site.
79. From all the available evidence²⁷, and my site visits, my brief conclusions on these issues are as follows: the site is about 1 km. from Holt town centre, and is located within a peripheral, semi-rural area which is detached from the main built-up parts of Holt. It is largely surrounded by other farmland, woodland, and school playing fields. As a result it has a significantly lower sustainability score in the SA compared with the omission site H01 (Land to the west of Woodfield Road). It is much less well integrated with the town, and with most of its services and facilities, and the proposed 120 dwellings would appear as a somewhat detached, even anomalous outlying residential estate.
80. While the LHA has no objections in principle to the proposed allocation, one of its preferred options would be site H01. The latter's relatively central location would facilitate many more trips to the town centre by walking and cycling, whereas, despite being on an existing bus route, site H15 would be significantly more car-dependent. Satisfactory access to site H01 could be taken from Woodfield Road and Cley Road. There is no persuasive evidence that traffic generated by this site would exacerbate congestion in the town centre.

²⁷ Including the current planning application by Greshams School for site H15, and the representations by Landform Holt Ltd. in favour of the allocation of the alternative site H01

81. In landscape terms, the main disadvantage of site H01 is its location within the AONB. However, this is largely notional, as this is an urban fringe location, not very sensitive in landscape terms, and it is detached from the attractive, open AONB countryside to the north. Indeed, a residential development here could be sensitively related to the existing urban edge, rather than being well separated from it as in the case of site H15. And I have noted above that a few housing allocations are required in the least sensitive parts of the AONB.
82. Whereas, as outlined above, the main rationale for development at site H01 is its relatively accessible, sustainable and unobtrusive location, that for site H15 appears, at least in part, to be its potential contribution, (in financial terms), to the future development and rationalisation of the Greshams School estate. Although not expressed as such by the Council, this is akin to an argument for enabling development to assist in the conservation of historic buildings. While no one doubts the longstanding and continuing contribution of this famous school to the economy and life of the town, that does not put it in a privileged position (vis a vis other prospective developers) when seeking planning permission for non-education-related development. Thus in my opinion it does not override all other planning considerations, including those summarised above.
83. In sum, I find draft allocation H15 to be the most marginal or borderline of all the SSPs in the DPD, particularly given the evident suitability, availability and deliverability of the alternative site H01. Site H15's peripherality to the town, its distance from the town centre, its inferior sustainability score, and its lack of advantage in terms of both landscape impact and traffic and transport considerations, make it an inferior choice compared with the similarly sized but better located and more sustainable site H01. These disadvantages are not overcome by its connection with, and potential contribution to the future development and rationalisation of the Greshams School estate.
84. **IC1: I therefore recommend that: a) draft allocation H15 be deleted from the DPD, and b) to substantially make up the resulting housing shortfall, that site H01 (Land to the west of Woodfield Road) be allocated for approximately 100 dwellings, subject to compliance with adopted CS policies, including on site provision of the required proportion of affordable housing (currently 45%) and contributions towards infrastructure, services, and other community needs as required and: i) layout, design and landscaping that has regard to the setting of the town, and the site's location within the AONB; and ii) any other design, access and environmental criteria as may be determined by the Council, in consultation with the site owners.**
85. *SSP CP10: Holt – Land at Thornage Road.* The proposed allocation raises the following main planning issues: need for an additional car park; traffic impact and highways design; pedestrian link with Holt town centre; landscape and ecological impact. Any full planning application raises additional matters of detailed design (site levelling,

surfacing and landscaping; ancillary buildings and structures; lighting, signage etc.)

86. I understand that the question of the need, and the best location and design, for a substantial new public car and coach park for Holt has been under discussion locally for several years. The principle remains controversial, and has attracted much support as well as many objections. The Council has indicated its support in principle – as is evident from the draft allocation in the DPD – and prior to the hearings resolved to grant full planning permission.
87. From all the available evidence, and my site visits, my brief conclusions on the allocation (as opposed to the detailed design) issues are as follows: I visited Holt several times during the course of the examination and observed for myself the frequent traffic congestion in and around the town centre, particularly during shop opening hours. This is caused in part by the generally narrow road carriageways, the shortage of parking spaces, and the tendency for car drivers to circulate while looking for a space, thereby adding to congestion. While there are on-street short-term spaces, and a few existing car parks, I accept that there is and will remain a need for a substantial additional one, for both long- and short-stay car and coach parking, and in close proximity to the town centre.
88. The allocated site lies in the open countryside on the south west side of town, and outside the settlement boundary as defined on the PM. However, it is within easy and safe walking distance of the High Street. Importantly, it can readily be reached from the nearby A148 roundabout. From the transport assessment and consultations with the LHA, I agree that a safe and convenient vehicular access to it, with good visibility and incorporating a right turn lane, could be made from Thornage Road. This would not disrupt traffic circulation in or around the town. A suitable pedestrian route could follow Valley Lane past the primary school.
89. Despite the scope for grading and peripheral planting to assist with its integration into the rural landscape, the car park would be conspicuous from Thornage Road and from some other local view points, and would tend to harm the setting of Holt from this south-western side. It would affect some views of the town centre CA. The site also lies within a rural CA (the Glaven Valley), but this is very extensive, stretching from Briston in the south to the sea coast, and CS policies do not preclude new development within it. Nevertheless, landscape impact - while not determinative - is a significant planning objection, and not easily mitigated. There may also be some, albeit minor, adverse ecological impacts, but on these there is little information available.
90. Despite these drawbacks, the longstanding and pressing need for the facility, the relative ease of access to the proposed site, and the absence of any preferable alternative sites are all factors which justify the allocation. On balance, I support it.

91. *SSP NW28a: North Walsham – North Walsham Football Club*. This draft allocation raises the following main outstanding planning issues: suitability of local highways network, and accessibility/safety for pedestrians.
92. From the available evidence, and my site visit, my brief conclusions on these issues are as follows: The LHA maintain an objection to this allocation for 60-80 dwellings (scaled down from some 350 on site NW28 in a previous draft of the DPD), largely on the basis of the traffic generation on the local road network, and the unsuitability of the existing pedestrian links to the town centre.
93. These objections are countered by the Council's transport consultants' report²⁸, which sets out various minor and relatively inexpensive improvements that could in principle be made to the main pedestrian link via Queensway and Cherry Tree Lane. For its part, the LHA questions whether these would be capable of practical implementation.
94. The allocation site lies on the western edge of North Walsham, but is only about 10 minutes' walk from the town centre using that link. I note that the main vehicular access to the proposed development would be via Greens Road (part of B1145 Aylsham Road) on its western boundary, and I am not aware of any particular capacity issues there or at its junction with the A149 Cromer Road, which, I have assumed, would take the majority of both incoming and outgoing traffic. Indeed, the LHA may well have over estimated the potential traffic generation from the site itself.
95. Moreover, I think that the LHA has exaggerated the alleged inadequacy or unsuitability of the main footpath link between the site and the town centre; even in its existing state, it provides a direct and, in my view, acceptably safe route, even for mothers with small children, and elderly persons. It is everywhere wide enough to take a child's buggy, including where it passes underneath the road and railway bridges near its eastern end. While it does not meet ideal modern width standards, it is already well used by local people, and is by no means so imperfect, or potentially dangerous, as to deter very many from making this relatively short trip on foot and "leaving the car at home". In my view the quite modest improvements suggested to pinch-points by the Council's consultants would improve it further, and I see no compelling reasons in principle why they could not be provided by the developer through a planning obligation. I note too that the site and the general locality have good bus and rail links, providing other modes of transport as alternatives to the car.

²⁸ Doc I.30

96. In short, I am not convinced that there are compelling or insuperable highways capacity or safety objections to this draft allocation, which I find suitable in all other respects. I therefore support it.
97. *SSP SH06: Sheringham – Land rear of Sheringham House.* This draft allocation raises the following main planning issues: principle of development in the AONB; sustainability of site; quantum of development; effect on the character and appearance of the site; and location of vehicular access.
98. From all the available evidence, and my accompanied site visit, my brief conclusions on these issues are as follows: I have noted above my support in principle for allocations to be made within the Norfolk Coast AONB. This particular site (along with draft allocations SH04 and SH05, also in the Morley Hill area) falls well within the settlement boundary for Sheringham, as shown on the PM, and its development would have no significant impact on the AONB in the countryside outside the town. That, in my view, is the AONB "proper".
99. I agree with the Council and Sutherland Homes Ltd²⁹ (site owners and prospective developers) that the site's overall sustainability score should be 2 points higher than is indicated in the SA, and that the site could readily be provided with an improved footpath link to the town centre.
100. Aside from its sustainable location, the general suitability of this site for development is backed up by much detailed survey evidence, including ecological, arboricultural, archaeological, flood risk, visual and transport assessments³⁰.
101. While Sutherland Homes are promoting more than the 70 dwellings indicated in the draft allocation (for occupation as retirement homes for the over-55s), I think it would be prudent to retain that figure in the DPD. That would be consistent with other DPD allocations (none of which specify retirement homes per se), and in order to retain much of the openness of the site – including the small orchard – its other trees, and its ecological value, and in general to avoid any risk or perception of over-development. That said, the site is generally well screened from its surroundings and is not prominent in the local landscape, and (subject to its density and detailed design) that amount of development could be accommodated without harming its character and appearance. That would not preclude an application for retirement housing, which could be assessed on its design and other merits at the application stage.
102. Finally, having looked at various potential points of access I support KC08, which would allow for access arrangements to be considered at

²⁹ Doc J2.9.i – statement of common ground

³⁰ See Docs I.32ff.

application stage, including the possibility of all vehicular access being derived from Willow Grove to the south, rather than 2 separate points. In short, I support the draft allocation.

103. *SSP KC09: new employment allocation – Land south of Weavers Way, Stalham, adjacent to A149 (site E12).* This draft allocation, introduced at the key changes stage, raises the following main planning issues: need for additional employment land at Stalham, location relative to the town and the A149, landscape impact.
104. From the available evidence, and my site visit, my brief conclusions are as follows: there is a demonstrable need for a substantial new employment land allocation at Stalham, but the allocated site has the apparent disadvantage of being located in the open countryside some distance to the west of Stalham and detached from it and its existing (small) employment areas.
105. However, it is well located for access from the A149 (via Stepping Stone Lane), thereby avoiding generating HGV movements in the town itself, and new employment uses on it would not raise any serious residential amenity issues. Although there would be a loss of some 4 ha. of high quality farmland, there are no other significant environmental constraints, and the site is large enough to be well screened by landscaping and planting to mitigate the landscape impact of business development. It would also have a direct and practicable footpath and cycle link to the town centre. While other peripheral sites have been suggested for employment growth at Stalham, I agree with the Council's officers' assessment³¹ that this site is on balance the least problematic among them.
106. In short, I support the proposed allocation.
107. *SSP CP2: Wells next the Sea – Land north of Freeman Street.* This proposed allocation raises the following main planning issues: need; location relative to Wells centre, and road/pedestrian access; landscape impact; effect on designated wildlife sites; effect on adjoining residential properties.
108. From all the available evidence, and my site visits, my brief conclusions on these issues are as follows: The need for an approximately 300-space visitor car park, located as close as possible to the centre of Wells, is recognised in the CS³² and is demonstrable and proven. The allocated site is the only suitable and available site which is convenient enough to be attractive to car-borne visitors (the majority of visitors to the town) and also readily accessible from the local road network. As shown in the current planning application³³

³¹ Doc I.2 (report to LDF Working Party, December 2009)

³² In policy SS14

³³ Doc I53.iii

safe and convenient pedestrian access can be provided to the main waterfront and central streets.

109. Owing to the openness of the site, which is a greenfield site in the Norfolk Coast AONB, and its edge of town location, the proposed car park would have a significant, and potentially substantial, landscape impact. This would harm its setting, and that of Wells itself, in some views. (I think this harm is underestimated in the planning application's visual impact assessment.) But so would any accessible alternative. And the proposals would include very few structures, and no conspicuous ones, as opposed to hard surfacing materials (and of course the parked vehicles). Landscaping, including both mounding and planting, would help to mitigate this visual impact, even in views from the adjoining dwellings at Mainsail Yard, but it could not eliminate it.
110. While the site is not PDL, and has been used for grazing, it has relatively little conservation interest, although it is visited in numbers by such bird species as Brent Geese. It is not itself subject to any international or national nature conservation designations, but the Holkham national nature reserve, the North Norfolk Coast SAC and SPA (and part of a Ramsar site) all lie nearby. Further afield are 2 county wildlife sites. Many protected species (mostly birds, including some rare migrants) have been recorded within 2 kms. Despite this wealth of biodiversity resources in the near vicinity, as recognised by all these designations, the ecological assessment (which in my view is adequately thorough) indicates that adverse impacts from the car park would be slight, and capable of mitigation. There is even some potential for ecological enhancement.
111. The main adverse effects on residential amenity would fall upon the fairly recently completed, 2/3 storey Mainsail Yard development. Some of the units therein would suffer a loss of visual amenity, especially in views over the car park and its access road from habitable rooms. Potentially, they could also suffer a loss of amenity through increased noise and disturbance, arising from the movements of visiting cars, coaches and pedestrians. There would probably also be some light pollution. These effects would vary seasonally and diurnally, and in some degree could be mitigated by detailed design and landscaping. But, given the need for the car park, and the lack of alternative sites, they would not by themselves justify the deletion of the CP2 allocation.
112. In short, the benefits of the proposed car park for Wells outweigh its disadvantages, and I support the proposed allocation, and recommend no changes to it.
113. *SSP ROU03/10: Roughton – Land at Back Lane.* This proposed allocation raises the following main planning issues: its location relative to the village centre; landscape impact; flood risk and drainage; accessibility and highways safety; impact on adjoining residential properties.

114. From all the available evidence, and my site visits, my brief conclusions on these issues are as follows: The allocated site is the best located (for the proposed level of development) in Roughton, particularly in relation to most existing village services and facilities, which are clustered around or close to the main A140/B1436 crossroads. Thus it represents the most logical site in the village for expansion.
115. With its scope for incorporating new community facilities, it would also help focus the village centre, and would be well connected with it. By contrast, the suggested omissions sites (including ROU02) are more peripheral; nor is ROU02 particularly conveniently linked to the outlying Groveland suite of farm shops etc. In any event, Groveland does not in my view justify a lateral extension of Roughton along the B1436.
116. The allocated site mainly comprises a grassed field, with wetter low-lying areas to the north which lend themselves to recreation uses. The proposals also offer the distinct benefit of a new, centrally located site for a village hall.
117. Development of the site would not harm the countryside setting of this part of the village, and would be less intrusive in the landscape than development of other sites (including the aforementioned ROU02, which is in the Norfolk Coast AONB.) Although there are some existing drainage issues related to flows in the Hagon Beck, these can be satisfactorily resolved by relatively minor engineering works, and they do not preclude development of the allocated housing areas. A SUDS could also be specified at the detailed design stage.
118. The proposed development would not generate or attract large amounts of vehicular traffic. Despite the reservations of the LHA, and with suitable and sensitive access design, it would not undermine the safety or free flow of traffic (including cycles and pedestrians) on the local road network, including Back Lane and Old Turnpike Road. And, given its location near the A140, the development would have good accessibility to the nearby towns, including by public transport. With due attention (in a planning application) to its residential layout, and its detailed design and landscaping, no adjoining dwellings in Orchard Close or on the west side of Old Turnpike Road would be significantly/adversely affected.
119. In short, I support the proposed allocation, and I recommend no changes to it. There are no preferable alternative sites in or around Roughton.

Omission Sites

120. The current development plans regulations³⁴ do not refer to "omission sites" as such, but these are generally understood to be sites which have been proposed by parties making representations on the DPD, but which have not been finally selected by the Council as draft allocations.
121. Under the previous development plans system, these - like the proposed allocated sites - might well have been discussed in Inspectors' local plan inquiry reports. But under the current system it might only be necessary to do this if I were to recommend the substitution of an omission site, or sites, for one or more of the proposed allocations. With one exception I am not recommending any such substitutions, because in my view (apart from that one exception) none of the suggested omission sites is to be preferred, on balance, to the proposed allocations.
122. As for the other omission sites, having read the relevant documentation and having visited many of them, I find that development on them would be contrary to, or would harm one or more of the following material considerations: i) national policy or the CS development strategy; ii) retention of a use protected by a CS policy; iii) the character or appearance of the countryside and/or a part of a settlement, including valuable open spaces; iv) views towards or within a settlement, particularly from roads, public footpaths and public open spaces; v) the open character of land within an AONB, the undeveloped coast, or other designated land; vi) the setting and character of a CA and/or a nearby listed building; vii) existing trees or woodland; ix) nature conservation interests; and/or x) the safety and free flow of traffic, including cyclists and pedestrians. This list covers the most frequently occurring planning objections, but is not exhaustive.

Council's Proposed Key Changes (KCs) and Minor Modifications (MMs)

123. Some 13 KCs were proposed by the Council (Doc. A1.3) before submission of the DPD. These were subject to public consultation in January/February 2010. The KCs have proved very largely uncontroversial, and in my view most of them do not raise any major soundness issues. Arguably the one exception is KC09 (new employment land allocation at Stalham), which I address above. I support KC09, and all of the Council's other proposed KCs.
124. The MMs (Doc. A1.4) were also published by the Council before submission of the DPD. By definition, they all relate to minor matters which do not raise any soundness issues. I support them. I note however that MM10 and MM11 refer to draft allocation site H15, whose

³⁴ Docs C13 and C14

deletion I am recommending. Therefore MM10 and MM11 are not now required.

125. During the examination hearings the Council proposed 11 Further Minor Modifications (Doc. A1.4.i), most of which elicited no comments from participants. However, FM03 - which the Council proposed to allay concerns from Natural England and the RSPB regarding visitor pressures on SACs and SPAs - attracted an objection from Sutherland Homes Ltd on the grounds that it might place an unnecessary and onerous requirement upon prospective developers. On consideration, I do not endorse that objection. It follows that I support all of the Council's proposed Further Minor Modifications.

Legal Requirements

126. My examination of the compliance of the Site Specific Proposals DPD with the legal requirements is summarised in the table below. I conclude that the DPD meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Site Specific Proposals DPD is identified within the approved LDS (Fifth Revision, September 2009) which sets out an expected adoption date of January 2011. The DPD's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 and consultation has been compliant with the requirements therein, including the consultation on the proposed key changes.
Sustainability Appraisal (SA)	SA has been carried out, independently verified and is adequate.
Appropriate Assessment (AA)	The AA meets the requirements of The Habitats Regulations and is adequate.
National Policy	The DPD complies generally with national policy.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The DPD complies with the Act and the Regulations.

Overall Conclusion and Recommendation

127. **I conclude that with the key changes proposed by the Council, and the one change that I recommend, set out in Appendix A, the North Norfolk Site Specific Proposals DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria**

for soundness in PPS12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor modifications (except MM10 and MM11) and further minor modifications.

Paul Dobsen

Inspector

This report is accompanied by:

Appendix A: Change that the Inspector considers is needed to make the DPD sound

Appendix A – Change that the Inspector considers is needed to make the plan sound

This change is required in order to make the Site Specific Proposals DPD sound.

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Holt chapter, para. 6.2	Delete draft housing allocation H15 (Land south of Cromer Road, Holt) and replace with new allocation H01 (Land west of Woodfield Road, Holt) for approximately 100 dwellings, subject to compliance with adopted CS policies, including on site provision of the required proportion of affordable housing (currently 45%) and contributions towards infrastructure, services, and other community needs as required, and: i) layout, design and landscaping that has regard to the setting of the town, and the site's location within the AONB; and ii) any other design, access and environmental criteria as may be determined by the Council, in consultation with the site owners.