

North Norfolk Core Strategy incorporating development control policies

INSPECTOR'S SCHEDULE OF MATTERS AND ISSUES FOR EXAMINATION (18th October 2007)

Day 1 – Tues 4 December 2007

AM CORE AIMS AND KEY ISSUES

Key issues:

- i. How have document's Strategic Aims and Key Issues been identified?
- ii. How have community interests been engaged in their identification?
- iii. How were the priorities evolved?

PROCEDURAL MATTERS

[Soundness Tests 1; 2A/B; 3;]

Key issues:

- iv. Has the Strategy been prepared in accordance with the current Local Development Scheme and have the relevant details in the LDS been met?
- v. Has the Strategy been prepared in compliance with the adopted Statement of Community Involvement, including explaining how community involvement has been undertaken and how views have been taken into account?
- vi. Has the Strategy been subject to Sustainability Appraisal, which has properly identified the process carried out, the baseline information used and the outcomes of the process?
- vii. Has the Strategy preparation included an Appropriate Assessment on the impact on European sites having regard to the Conservation (Natural Habitats etc) Regulations 2006? Is any clarification or update needed?
- viii. Is there a complete Strategic Flood Risk Assessment which has informed the preparation of the Core Strategy and related DC policy?

PM PROPOSALS MAP AND KEY DIAGRAM

Key issues:

- i. Does the Proposals Map link with the Core Strategy and its Key Diagram?
- ii. How does it relate to the Site Specific Proposals DPD?
- iii. What is the position in relation to extant Mineral and Waste designations and allocations?
- iv. What policies are saved from the SP and LP and have they been shown on the Proposals Map where they have a specific spatial dimension?
- v. What is the status of the Cromer, Sheringham, Holt "Cluster" on the Key Diagram, and is it reflected in any policies shown on the Proposals Map?
- vi. Detailed Proposals Map queries raised by representors?

Day 2 – Wed 5 December 2007

SPATIAL VISION & STRATEGY

[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]

Key issues:

- i. How has the Council approached the Vision, Objectives and generation of the Strategy?
- ii. Is the Spatial Strategy soundly based and appropriate for this area, consistent with RSS & national policy, reflecting community views, and providing a sound basis for the strategic spatial policies, including local justification for variance with higher policy?
- iii. Are areas for development and restraint clearly identified and related to the Key Diagram?
- iv. Does the spatial strategy properly reflect the objectives and policies of the emerging RSS, and does it provide sufficient flexibility to deal with changing circumstances?
- v. Has the Council considered all reasonable options in terms of the development strategy?
- vi. Does the Strategy clearly relate to other relevant plans and strategies which influence the delivery of its proposals?
- vii. Does the Strategy integrate effectively with plans prepared by other local planning authorities in the area (eg the County Council and adjoining local planning authorities)?
- viii. Are cross-boundary issues properly and sufficiently addressed?
- ix. How was the settlement hierarchy identified, including the categorising of Towns and the selection of Service Villages and is there a need to define it more clearly?
- x. Has the need for encouraging sustainable transport informed the process with regard to improved public transport services and the role of the Bittern railway line?
- xi. Is the role, function and choice of Principal Settlements based in sound evidence?
- xii.

Day 3 – Thurs 6 December 2007

AM **SPATIAL VISION & STRATEGY (cont'd)** *[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]*

- i. Is the role and function of Secondary settlements clear? Have the right settlements been chosen?
- ii. Has the role of transport links (road and rail) in connecting the area been sufficiently considered?
- iii. Is the approach to development in the countryside and non-selected settlements sound and are the tensions between development needs and conservation fairly balanced?
- iv. Should the smaller rural settlements be allowed some development to assist their longer term sustainability?

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- v. Is the role and function of Service Villages clear? Have the right settlements been chosen?
 - vi. Is the role and function of Coastal Service Villages clear? Have the right settlements been chosen?
 - vii. Other settlement specific queries
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Day 4 – Fri 7 December 2007

AM **Town Strategies** *[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]*
Key issues:

- i. Are the individual Town Strategies consistent with the CS's overall approach?
 - ii. Do the proposed town strategy policies adequately reflect the issue and needs of each place and the opportunities and constraints affecting development in:
 - a. Cromer (SS7); Sheringham (SS12); Holt (SS9); (clarify "cluster policy")
 - b. Wells-next-the-Sea (SS14);
- PM**
- c. Fakenham; (SS8);
 - d. North Walsham (SS10);
 - e. Hoveton (SS11) & Stalham (SS13);
 - iii. Are the Town Strategies consistent with the rest of the CS policies?
 - iv. Are adequate monitoring mechanisms in place to adapt to changing circumstances?
 - v. Any other relevant points raised by representors?
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Day 5 – Tues 11 December 2007

AM **HOUSING_(Strategic)** *[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]*

Key issues:

- i. What housing numbers does extant and emerging RSS expect the area to deliver?
- ii. Are there outstanding queries re this?
- iii. How does the strategy aim to ensure sufficient dwellings are provided?
- iv. Will there be sufficient land to provide a 5, 10 (and 15) year supply?
- v. Is the distribution of new dwellings consistent with the Spatial Strategy and sustainable travel options?

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- vi. Have the risks of overshoot and undershoot of housing delivery been considered and how will this be managed?
 - vii. Is the intended delivery of housing over-reliant on windfall sites and what assumptions underlie this approach? Would it harm the ability to deliver affordable housing?*
 - viii. How has the distribution of the housing yet to be delivered (ie uncommitted) been done?
 - ix. How were distributional options considered in arriving at the final proposals?
 - x. How was the housing mix between different sectors/user groups (eg Affordable housing*, elderly) arrived at and is it too prescriptive?
 - xi. Is there sufficient focus on the housing needs of the elderly?
 - xii. What does the Affordable Housing strategy aim to achieve and does it fit with the overall strategy?
 - xiii. Is the proposed density figure of 40 dwelling per hectare for main settlements (HO7) too rigid and inflexible, and if so, what implications are there for the estimated land supply?
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Day 6 – Wed 12 December 2007

AFFORDABLE HOUSING (Policies HO2 &3) [Soundness Tests: 4A/B/C; 5, 6: 7, 9]

Key issues:

- i. What local factors led to the definition of Core Aim 1 and policies HO2 & 3?
 - ii. What is the thrust of national policy & advice in PPS3 and elsewhere and what does extant and emerging RSS say about this topic?
 - iii. What is the evidence base for Policy HO2 and how robust and up to date is it, including the analysis in Core Document H3? Should the up-to-date evidence have been part of the CS Sustainability Appraisal?
 - iv. Is Policy HO2's site size threshold and the 45% target for AH dwellings underpinned and fully justified by the evidence having regard to emerging RSS policy?
 - v. Will the allocated sites be large enough to enable provision of AH at this level; should site development viability be factored in, and if so, how?
 - vi. Is Policy HO2 sufficiently flexible to take account of changing circumstances?
 - vii. How realistic and deliverable is the application of the 50% target in Service Villages?
 - viii. Is the overall policy likely to be deliverable if market conditions change materially?
 - ix. Are resources likely to be available to RSLs to help meet the 80% social rented target?
 - x. Is there a local role for intermediate affordable housing and if so where does it fit into the policy framework?
 - xi. Is there a need for SPD on "in lieu" contributions and control mechanisms?
 - xii. Are the control mechanisms spelt out and fit for purpose?
 - xiii. Would HO3 permit AH in unsustainable locations poorly related to key services?
 - xiv. Should the need for AH override other planning considerations in smaller villages?
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Day 7 – Thurs 13 December 2007

AM HOUSING – OTHER POLICIES

[Soundness Tests: 4A/B/C; 5, 6: 7, 9]

Key issues:

- i. Are the following policies consistent with national policy and RSS and where not is the case for departing from such policy based on sound and credible evidence?

Sites for Gypsies, Travellers & Showpeople HO4

Agricultural and key worker dwellings HO5

Removal of AWD occupancy conditions HO6

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House extensions & replacement dwellings HO8

Re-use of rural buildings as dwellings HO9

Day 8 – Tues 8 January 2008

**AM ACCESS & INFRASTRUCTURE
TRANSPORT & COMMUNITY**

[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]

Key issues:

- i. Is there a potential shortage of infrastructure in the area likely to prevent delivery of the plan, and if so what options are available to address identifiable constraints?
- ii. Does the CS need to be more proactive in this regard?
- iii. How committed are infrastructure providers/stakeholders to the Strategy, and does more need to be done to influence their plans?
- iv. How are timing and phasing of development to be linked to infrastructure provision?
- v. Are the monitoring measures adequate?
- vi. Is the Strategy consistent with the Local Transport Plan?
- vii. Does strategy do enough to foster sustainable transport and choice of travel modes including maximising the use of existing rail routes/services and providing for necessary ancillary development?
- viii. Open space designations Policy CT1 – Does the policy comply with national guidance in PPG17? How were the areas chosen? Would it safeguard natural village greens and play areas in the countryside, parks in towns, and open space in new developments? Is Church House, Wells correctly included? Are open spaces in Cromer properly protected including North Lodge Park? Open land in Aldborough? Open Space Standards: – are they too onerous?
- ix. Provision & retention of local facilities & services Policy CT3 – Does plan properly reflect role of voluntary sector and the need to consult local organisations? Need for a Community Resource Centre for Fakenham? Should the plan include a criteria based policy to deal with a firm prison proposal should it arise during the plan period? Should there be an assessment of need in relation to a community facility before its loss is agreed?
- x. Developer Contributions Policy CT2 – Is the approach to developer contributions consistent with national advice in Circular 05/2005 and its practice guidance volume? (Core Documents?) and otherwise generally sound? How much can be delegated to the proposed SPD? Contributions for additional Police resources required as a result of new development? Subsequent protection of open space set aside as part of new development? Appropriate timing of development contributions in relation to scheme economics? Appropriate balance of funding between developer contributions and public purse? Maintenance and pump priming payments?

Would the policy harm deliverability of new development (especially housing) by reducing scheme viability? Need for more detail on education, open space and sports facilities contributions? Any other detailed sub-issues?

xi. Telecommunications Policy CT4 – Should policy preclude sites only accessible by footpath or bridleway? Should policy address need for improved broadband and digital TV signals in Cromer? Should there be a presumption against telecommunications masts close to housing unless there is no demonstrable alternative?

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xii. Transport impact of new development – Policy CT5 – Should the policy commit to preserving the Cromer to Happisburgh coast road linking the service villages? Can the A1151 accommodate traffic arising from new housing in Hoveton, Stalham, Ludham and Catfield without capacity improvements and if not should the housing allocations be reduced to avoid increased congestion in Hoveton and Wroxham villages?

xiii. Parking provision – Policy CT6 and Appendix C – Are the policy's parking provision standards consistent with the thrust of national guidance to reduce reliance on car usage and the need to balance other environmental objectives in new development? Should the parking standards be more flexible in relation to car parking provision in town centre and edge of centre sites? Does the policy adequately address the need for improved station parking to encourage modal shift onto the Bittern railway line at all stations along the line and at North Walsham in particular?
Xiv Safeguarding land for sustainable transport uses – Policy CT7 – Is safeguarding of land at Great Ryburgh for potential rail freight use realistic? Should the former rail route from High Kelling to Fakenham be protected from development under the policy? Should the policy be more pro-active in promoting greater passenger and freight use of the Bittern railway line including usage monitoring targets? Is the Proposals Map clear in relation to CT7 proposals?

Day 9 – Wed 9 January 2008

AM **ENVIRONMENT**

[Soundness Tests: 4A/B/C;5, 6: 7 & 9]

Key issues:

- i. How were the Core Aims for the Environment generated and how were they related to nationally designated areas (e.g. AONB, The Broads)?
- ii. What evidence underpins the landscape and coastal protection policies, and is further work to be done, and if so how will that feed into the development plan LDF?
- iii. Are the policies to protect the historic environment sound and flexible?
- iv. Are the policies to safeguard biodiversity and geological interests sound and flexible?
- v. Design Policy EN4 – Is the policy consistent with national policy and how will local distinctiveness and other matters raised by representors be factored in?
- vi. Public Realm Policy EN5 – Can the policy be operated while also accommodating the needs of traditional enterprise such as fishing? Are car parking measures and improvement of the public realm policy mutually exclusive?

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- vii. How are climate change issues addressed and how is this linked to more detailed policy such as the spatial strategy, sustainable construction and renewable energy?
- viii. Sustainable construction & energy efficiency Policy EN6 – Where is government policy & RSS on this issue. Should EN6 encourage or require energy efficient buildings/renewable energy beyond Code for Sustainable Homes standards? Can the policy avoid overlap with Building Regulations and if so how?
- ix. Renewable Energy Policy EN7 – Is the policy consistent with the thrust of national guidance (PPS22)? What are the RSS targets in this regard and how will the policy deliver them locally? Are the delivery targets meaningful? How is the need for greater renewable energy to be reconciled with local environmental protection?

Day 10 – Thurs 10 January 2008

AM **ENVIRONMENT II**

[Soundness Tests: 4A/B/C;5, 6: 7 & 9]

Key issues:

- i. What evidence underpins the approach to Flood Risk and is it consistent with the policy expectations in PPS25? Is the SFRA sufficient for its purpose?
- ii. Is the general approach to Flood Risk sound, and if not, what changes would make it so?
- iii. Flood Risk Policy EN10 – Is the policy consistent with PPS25; should other uses be permitted in flood risk zones; is the policy flexible enough? Is the SFRA complete and has it properly informed the policy? How does the SMP fit into the picture? Is Catfield rightly identified as a Service Village?

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- iv. Is the Coastal Erosion policy EN11 sound and able to adapt to changing circumstances? How consistent is it with other plan policies? How does the SMP fit into the picture?

- v. Is the replacement of affected development policy EN12 sound? Are there viable alternatives to it? Is the policy too restrictive? How would EN12's criteria work in practice? How will the policies be reviewed?
- vi. Any other Environmental policy issues not covered by above

Day 11 – Tuesday 15 January 2008

AM **ECONOMY I**
Key issues:

[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]

- i. What are the Strategic Aims in Core Aims 5 and 6 and elsewhere, and are they consistent with the extant & emerging RSS?
- ii. What evidence underpins the Economy strategy and how have stakeholders been engaged and tensions resolved?
- iii. What is the likely demand for & supply of new employment land required to support the Core Aims?
- iv. Is it deliverable in line with the anticipated population growth and locations?
- v. Should existing employment areas outside settlements be protected?
- vi. Does the analysis support any proposed 'de-allocations' of land currently designated for employment purposes in the Local Plan?
- vii. How will the "bad neighbour land" be identified, delivered and controlled?
- viii. Are monitoring mechanisms appropriate and able to adapt to changed circumstances?
- ix. Would the employment land be in the right places to provide a Sustainable mix of job opportunities?

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- x. Farm Diversification Policy EC1 – Is the policy consistent with PPS7 and RSS? Is it over-restrictive given the need to encourage rural diversification? How would the various criteria, including the floor space limit on new build, work in practice?
- xi. Re-use of rural buildings Policy EC2 – Is the policy consistent with PPS7 and RSS? Is it over-restrictive given the need to encourage rural diversification? Should residential conversion of rural buildings be permitted?
- xii. Extensions to existing businesses in the countryside Policy EC3 - Is the policy consistent with PPS7 and RSS? How would the question of appropriate scale of expansion be addressed in a consistent way? Does this require clarification?
Is the Bacton Gas Terminal (BGT) likely to need to expand beyond its present defined boundary? If BGT contracted in its geographical extent how should the surplus land be regarded?

Day 12 – Wednesday 16 January 2008

AM **ECONOMY II**
Key issues:

[Soundness Tests: 4A/B/C; 5, 6: 7 & 9]

- i. Redundant Defence Establishments Policy EC4 – What does national policy and emerging RSS have to say on this topic? How does the policy fit within the plan's Core Aims? Is there a role for mixed use (including housing) development? Is it realistic to confine development to the designated 'technical areas'? Have the individual constraints and opportunities of each of the four ex airfields been properly addressed:
 - a) Coltishall
 - b) Neatishead (part)
 - c) Sculthorpe (part) (including need to preserve R Wensum SAC) NB Where is "X" on Proposals Map 53?
 - d) West Raynham

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Tourism Development

- ii. Location of new tourism development Policy EC8 – How robust is the evidence base for the policy? Does the policy comply with national guidance? Is the sequential order compatible with other local material considerations such as climate change and flood risk? Is it right to restrict new build unserviced accommodation in the countryside in all cases?
- iii. Retaining supply and mix of tourist accommodation Policy EC9 – Does the policy comply with national guidance? Does new serviced accommodation in suitable locations need more encouragement? Does the policy complement policy EC8?
- iv. EC10 & EC11 – Occupancy Conditions and Caravan and Camping sites_- any key issues here? Too restrictive? Clarification of areas in EC11?

Day 13 – Thursday 17 January 2008

AM RETAIL & TOWN CENTRES

[Soundness Tests 4A/B/C; 5; 6; 7; 9.]

- i. Is the overall strategy (SS1, SS5) consistent with national policy in PPS6 and emerging RSS? Is the retail hierarchy based on sound evidence? What was the approach to the identification and definition of large and small town centres and how have retail and other commercial and service interests been taken into account in this process?
- ii. Are the catchment areas, floorspace thresholds and exception criteria based on robust evidence and reasonable in the local circumstances?
- iii. How were the Primary Shopping Areas and Frontages defined and are they appropriate in all cases? Is the 30% non A1 use criterion flexible enough in all cases? Is the Service Village space limit for shops of 250sq m evidence based and reasonable?

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- iv. Retail and commercial leisure development Policy EC5 – Are the control criteria appropriate in all cases?
- v. Public Car Parking provision EC6 – Should public use of private car parking areas at the weekends be encouraged?
- vi. Amusement Arcades Policy EC7 – Is the policy consistent with PPS6 and otherwise sound? Might it be over-restrictive and unworkable by concentrating rather than dispersing such uses? Is the text clear? How would Sheringham fare under the policy?

Day 14 – Friday 18 January 2008

AM IMPLEMENTATION & MONITORING

[Soundness Tests: 8 & 9]

Key issues:

- i. Does the Strategy give sufficient/appropriate guidance in respect of Implementation, Monitoring and Performance Indicators so that it can be properly focussed and flexible to changing circumstances?
- ii. Does the Strategy need to go further in respect of an implementation framework for policies including in relation to infrastructure constraints? I.e. should it be more pro-active in securing infrastructure earlier so as to deliver new development in line with the strategy and the housing trajectory?
- iii. Are implementation timing/phasing issues sufficiently clearly addressed?
- iv. Are appropriate Performance Indicators identified and are there any outstanding queries?
- v. If changes to the Implementation and Monitoring section are proposed do they need to be the subject of further public consultation and Sustainability Appraisal?
- vi. Any other relevant points of a general nature raised by representors?

PM ANY OTHER MATTERS

A Washing Up session