

Session 2

Respondent number: 1045

**Spatial Vision and Strategy I**  
**Principal Settlements**

**STATEMENT OF CASE**

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ON BEHALF OF**

**SUTHERLAND HOMES LIMITED**

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## **SUMMARY OF OBJECTION**

This statement refers to the following policy objections:

### **Policy SS1**

#### ***Settlement Designations***

Policy SS1 makes distinctions between Principal and Secondary Settlements without showing an adequate evidence base. There is a danger that this sequential type policy will lead to unrealistic priorities being afforded to Principal locations not worthy of development.

#### ***Affordable Distribution***

The Affordable Housing distribution throughout the main towns within the District appears inconsistent with the designations found within Policy SS1.

### **Policy SS3**

#### ***Windfalls***

Windfall housing should not to be included as indicated within PPS3, consequently all windfall allowance should be deleted from the table.

#### ***Minimum Targets***

The overall housing provision in Policy SS3 should be treated as a minimum figure (see Housing Paper – Session 5)

#### ***Infrastructure***

Policy SS3 should delete the following, 'Development will be phased to ensure it does not occur until appropriate infrastructure is available', and replace with 'Development should be phased with infrastructure'.

## **Policy SS1**

- 1.1 The Spatial Portrait and the Spatial Visions and Objectives for the North Norfolk Core Strategy have been analysed and we have come to the conclusion that the Core Strategy is over complicated by policy SS1.
- 1.2 By seeking to draw a clear distinction between Principal and Secondary Settlements, without giving adequate evidence base for this distinction, Policy SS1 is considered weak. There is a danger that this sequential type policy will lead to priorities being unrealistically afforded to Principal. To band a settlement as a 'Principal' and therefore sequentially preferable to other settlements is considered ill-advised when it is clear that opportunities of varying scale will exist in all towns.
- 1.3 Paragraph 1.3.5 refers to the main settlements being seven towns and three large villages. We suggest simplification of Policy SS1 to state the following:
  - Towns (7-8)
  - Major rural settlements/coastal settlement (3)
  - Minor rural settlements
- 1.4 Policy SS1 appears to have unnecessarily added another sequential tier to that suggested above. We envisage that the policy will work whereby development first goes to Principal Settlements, then to Secondary Settlements, then to major rural settlements, then finally to minor rural. This is the wrong approach as there will be development opportunities of varying scale in all settlements within the District.
- 1.5 The Spatial Portrait section does not seek to differentiate between towns, other than to acknowledge that they have different functions, scale, make-up and land uses. This is not considered concise enough and we urge further clarification on the criteria for the designations, most notably Principal and Secondary settlements.
- 1.6 Paragraph 1.3.1 recognises all North Norfolk Towns are under the influence of Norwich and Paragraph 1.3.12 states that increasingly market towns and local employment centres have been subject to increasing competition from Norwich. However, 73% of residents are employed within the District. The quote in Paragraph 1.3.1 is therefore misleading as the fact so many of North Norfolk's

inhabitants work within the District would indicate that the urban areas such as Cromer are not under the influence of Norwich to such a high degree.

- 1.7 Because of the rural extent of North Norfolk District, it is useful to acknowledge the main towns serving different sectors as follows:

West Sector:	Fakenham (7,300) Well-next-the-Sea (2500)
Central Sector:	Cromer (7900) Sheringham (7200) Holt (3600)
East Sector:	North Walsham (12,100) Hoveton (2000) Stalham (3000)

- 1.8 On population alone it can be argued that three settlements are under 3000 and five settlements are 3000 and over. Paragraph 1.3.14 refers to the Cromer/Holt/Sheringham cluster, emphasising relationships and limits. As well as the continuing tourist role the three settlements act as a local cluster for retail, leisure and other services. This needs to be acknowledged further and we strongly believe that the Principal and Secondary designations of these settlements will hinder the way they can work together.

### **The Vision**

- 1.9 Paragraph 2.1.3 describes seven towns and the large village of Hoveton, but does not distinguish between them as Principal and Secondary settlements. Paragraphs 2.1.8 to 2.1.15 give the functions and development expectations of these towns, but again there is no concrete evidence/criteria base used to differentiate the roles of the settlements.
- 1.10 The Strategic Policy section paragraph 2.3.3 to 2.3.6 simply endorses the divide between towns and villages, and the countryside in ordering development locations.
- 1.11 The factors leading to the Spatial Strategy are listed under paragraph 2.4.1. These factors do not lead to differentiation of the four Principal Settlements and four Secondary Settlements. This is confusing as there needs to be distinguishable

factors if NNDC are to differentiate between the Principal and Secondary Settlements.

- 1.12 In terms of the section on settlement characters, it is strange that although Sheringham is the same size as Fakenham and Cromer, much larger than Holt and 2 to 3 times larger than other Secondary Settlements, it is not classified as a Secondary Settlement.
- 1.13 From the Housing Needs Study 2007, it was identified that Cromer had a clear need for affordable housing (159 units). It seems strange that Sheringham, only 2 miles to the east, has a far smaller need, only 37. Surely Sheringham can accommodate part of Cromer's requirement?
- 1.14 When one considers the availability of employment and retail within Cromer and Sheringham, it is clear that there are no significant differences. Sheringham contains major allocations and significant employment/retail provision. It is also evident that there is no major difference between utilities. In terms of leisure provision, Sheringham is no less prosperous than Cromer.

### **Policy SS3**

#### **Windfalls**

- 1.15 PPS3, paragraph 54, states that allowances for windfalls should not be included in land supply calculations unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. This evidence has not been shown in the Core Strategy. Policy SS3 should not rely on windfall sites.
- 1.16 During the first 6 years of the plan period, dwelling completion rates in North Norfolk have entirely comprised windfall developments (the North Norfolk Local Plan includes no residential allocations). The total windfall completions expected between 2001 – 2021 is 2514. This figure represents over 25% of the total projected completions. The Council are now requested under PPS3 to identify sites for development and not to rely on Windfall. Therefore the penultimate column of the table in Policy SS3 titled 'Windfall estimate' should be excluded.

#### **Minimum Targets**

- 1.17 Policy H1 of the Regional Spatial Strategy for the East of England states minimum targets to be exceeded by the following three categories (Increased density, PDL and exception sites). This means that the figure quoted (8,000 dwellings) should be the bare minimum built until 2021.
- 1.18 With the table in Policy SS3, the housing allocation column shows a lower and upper figure for density. There will always be cases where character may dictate that certain densities are not appropriate, even within Principal and Secondary Settlements. We strongly believe that only the lower should be relied on to meet the overall target and upper density criteria should be discounted.
- 1.19 Policy SS3 should properly identify sites for at least 8,000 dwellings, therefore completions and identified sites total 2062 plus 1512 equals 3574. Consequently, 8000 minus 3574 equals 4426, which is the total number of dwellings that need to be found on identified sites. This figure should be explicitly stated as a minimum number of dwellings to be built on newly identified sites before 2021. To this figure should be added 1726 dwellings to replace the figure attributed to density increase.

### **Infrastructure**

- 1.20 Policy SS3 implies development should be dependant on infrastructure being established in advanced. A similar approach was rejected by the RSS panel. This sentence should be deleted or replaced with 'development will bring forward the necessary infrastructure'. Further to this, Policy SS3 should delete the following, 'Development will be phased to ensure it does not occur until appropriate infrastructure is available', and replace with 'Development phased with infrastructure'.

### **Affordable Housing**

- 1.21 The Affordable Housing distribution throughout the main towns within the District appears inconsistent with the designations found within Policy SS1. The Housing Needs Survey 2007 found that the settlement with the highest affordable housing need/requirement is Cromer with 159 units per annum. The settlement with the least affordable housing need/requirement shows is Holt with only 23.