

Spatial Strategy for North Norfolk

1. The North Norfolk Core Strategy (NNCS) sets out a spatial strategy in Policy SS1 that identifies a hierarchy of settlements. It is proposed that future growth is focussed on the Principal Settlements in the District, including Fakenham, a further limited amount of development is directed to the identified Secondary Settlements, and a small amount of development located in identified Service Villages. This overall strategy is welcomed and supported by Trinity College Cambridge (TCC) as it reflects the Government's sustainable development objectives as set out in national planning policy statements.
2. The strategy accords with PPS1: Delivering Sustainable Development, and notably with PPS3: Housing which sets out a flexible approach to the selection of future development sites; focussing very clearly on the need to provide housing in "*suitable locations*" which offer access to community facilities, jobs, services and infrastructure (para. 36). It continues (para 37, 4th bullet) that where housing need and demand are high it will be necessary to consider a full range of options for distributing housing including the managed growth of settlements in urban and rural areas to ensure the delivery of sustainable and inclusive communities. PPS7: Sustainable Development in Rural Areas (para 2) refers to the inclusion of policies to sustain, enhance and where appropriate revitalise country settlements.
3. The spatial strategy set out in the NNCS is also consistent with the emerging and East of England Plan, which sets out the emerging Spatial Strategy for the Region (RSS), as proposed to be amended by the Secretary of State December 2006. The vision and objectives for the Region are set out in Section 2 of the RSS, and these highlight the importance of addressing the Government's planning policy imperatives. Notably in respect of increasing housing opportunities (objective ii), realising economic potential (objective iii), and infrastructure provision and social cohesion (objective iv). The Vision for the NNCS is closely aligned to these policy imperatives.
4. Specifically in respect of Sustainable Development, Policy SS1 of the RSS emphasises that the Spatial Strategy ensures that development "*maximises the potential for people to form more sustainable relationships between their homes, workplaces, and other concentrations of regularly used services and facilities, and their means of travel between them*", and respects environmental limits.

5. Policy SS2 of the RSS sets out the Spatial Strategy for the Region, and refers to the creation of sustainable communities in line with the objectives referred to above and *“ensuring an adequate supply of land for development consistent with the achievement of a sustainable pattern of growth”*, whilst prioritising the reuse of previously developed land where possible. Paragraph 3.10 explains that the strategy is essentially to concentrate development at the region’s cities, and other significant urban areas including selected market towns.
6. Policy SS4 of the RSS requires Local Development Documents (LDDs) to include proposals for the market towns that increases their economic and social sustainability by providing for an appropriate amount of new development, providing a sustainable balance of housing and employment development, and improving accessibility.
7. The RSS provides clear direction to the appropriate development strategy for North Norfolk, particularly in respect of the importance of the Market Towns. Moreover, it is worth recalling what the RSS Examination Panel concluded in respect of North Norfolk. In considering the NNDC’s request to increase the housing requirements identified in the draft RSS to that now proposed in the Secretary of State’s Proposed Changes, the Panel accepted NNDC’s view that the market towns in the District are sustainable locations for development, and that higher development requirements will help to provide the required affordable housing and support the local economy (para 5.44). The Panel report, however, continues to state:

“it will be necessary through the LDDs to set strong policies to ensure that the growth planned for these relatively remote towns assist in achieving reasonable self-contained and sustainable towns with lively economies and diverse communities.”
8. Consequently, the NNCS (para 2.4.3) states that the spatial strategy seeks to provide the required development in the most sustainable locations given the rural context, maximising the allocations on larger sites in the towns and large villages to ensure that the infrastructure required to deliver sustainable communities can be provided, support the local economy and maximise the amount of affordable housing provided.
9. This strategy rightly reflects the critical role of the market towns (the Principal Settlements) in the District as service centres for the surrounding rural areas, and reflects the provisions of the RSS Strategy. Furthermore, significant sustainable urban extensions to these settlements is the optimum strategy for providing the balance of homes, employment opportunities and supporting services and infrastructure required to deliver the sustainable, inclusive and mixed communities referred to in PPS3.

10. The overall development strategy as expressed in Policy SS1 is, therefore, considered to be soundly based in accordance with national and regional policy and appropriate for the particular circumstances of the area.

Strategy Implementation

11. TCC are concerned, however, that the over arching spatial strategy as set out by Policy SS1 will not being appropriately implemented by the subsequent policies within the NNCS, notably Policy SS3, which sets out the actual intended distribution of residential development in more detail. Whilst Policy SS1 states that a small amount of development will be focused on the Service Villages, when the provisions of Policy SS3 are examined in more detail, it is apparent that in reality, a very significant amount of development will be focussed into these locations.
12. The policy states that between 300 and 450 dwellings will be allocated in Service Villages. It also indicates that in the villages of Briston/Melton Constable and Mundesley, developments of up to 50 dwellings may be acceptable. When this scale of allocation is added to the substantial windfall estimate in these locations (1,399 dwellings), and remaining commitments (644) it is apparent that development in these locations will provide approximately a third of the total future dwelling numbers in the District.
13. Whilst the allocation of development to meet local needs in the service villages is not objected to per se, these are less sustainable locations as access to services, facilities, employment opportunities and public transport is relatively limited compared to the principal settlements, and the proposed overall scale of development should reflect that.
14. The "Settlement Planning for North Norfolk" Report which informed the preparation of the NNCS concluded (para 4.19) that the service villages have an essential strategic function as dormitories, and as such they were not recommended as sustainable locations for development other than to meet existing local needs.
15. The current level of proposed provision in these locations is clearly out of kilter with national and regional policy, and the strategy set out in Policy SS1, where the intention is to focus strategic new development into the principal settlements to maximise access to existing employment and education opportunities and to retail, leisure and community facilities. Moreover, it is the provision of strategic sustainable urban extensions that will optimise the provision of affordable housing and community

infrastructure provision. These objectives would clearly be compromised by the disparity in the actual development distribution as set out in Policy SS3, and the intent of the spatial strategy set out in Policy SS1. In this respect the NNCS fails soundness tests 4 and 7.

16. This can be remedied by increasing the relative amount of development allocated to the Principal Settlements through the redistribution of the development attributed to the Service Villages (which has in any case not been proven to be deliverable- see below), and by ensuring the additional allocations required to remedy the over reliance on windfall delivery (see representation to Policy SS3) is focussed on the Principal Settlements.

Settlement Hierarchy

17. TCC are not concerned with the settlement hierarchy as expressed in Policy SS1, except that they consider that there is a clear distinction between Fakenham, North Walsham and Cromer which properly perform the role and function of Principal Towns and Holt, which is more of a secondary settlement.
18. Whilst Holt clearly has a role to play in contributing to the overall housing requirement in the District, there are limited employment opportunities, and in terms of retail provision, Holt is a lower grade than other Principal Settlements identified. The town centre is also characterised by smaller individual specialist shops which are recognised as part of the town's assets. There is also a lack of public transport facilities. Clearly there is a balance to be struck between encouraging development of the town and preserving its intrinsic character.
19. Moreover, whilst TCC have not made representations on the selection of Service Villages and Coastal Service Villages, they are concerned that it has not been demonstrated that the scale of development proposed in those locations is appropriate or deliverable. That is contrary to the provisions of PPS3 that emphasises the need to allocate sites that are proven to be deliverable. Unless that is remedied the housing provision will be insufficient to meet demonstrable needs confirmed in the RSS, and that would be contrary to one of the Government's principal planning ambitions (as stated in PPS3) to deliver a step change in the supply of housing, and in doing so ensure a better balance of housing supply and demand, widen opportunities for home ownership, ensure a choice of high quality housing, improve affordability, and ultimately create sustainable, inclusive and mixed communities.

20. This reinforces TCC's view that a greater amount of development should be allocated the Principal Settlements, and particularly Fakenham.

Fakenham

21. Of the Principal Settlements identified, Fakenham is particularly well-placed to meet the strategic development requirements of North Norfolk over the next 15 years.
22. It is an established town, the second largest in the district, that accommodates a variety of facilities, services and industries, and therefore plays a significant part in serving a large part of the District as a principal residential, employment and service centre.
23. This is reflected by the high level of service provision relative to its size. In addition to general services within the town centre, the town has a good number of higher order services and facilities such as a high school, doctors surgery, town hall and a sports centre. The level of provision suggests that any new development in Fakenham would be well served for most daily and weekly needs, and thus travel minimised.
24. Indeed the NNCS (para 2.9.8) also highlights that Fakenham currently has the highest degree of self containment in the District. This is due to the high level of employment opportunity within the town, and its relative isolation from other major urban settlements, which means that it does not perform a dormitory role like some of the other towns in the District. The "Settlement Planning for North Norfolk" Report which informed the preparation of the NNCS concluded (para 4.13) that:

"Fakenham appears to offer the greatest opportunities for sustainable development to build upon its high level of self containment and role as an employment centre for surrounding settlements".

25. A Whole Settlement Strategy for the town was published by NNDC in June 2003 following extensive consultation with key stakeholders and the residents of Fakenham. That concluded that the town has the capacity to accommodate significant levels of development on previously developed land and greenfield land to the north of the town which would *"enable a choice of housing, employment, services and facilities to be sustained"* (page 1).
26. There is, therefore, a sound evidence base for the identification of Fakenham as a Principal Settlement, where there is a significant opportunity to provide a sustainable balance of homes, employment opportunities and supporting services and infrastructure in the town over the plan period.

27. Significant residential and employment development would support the town's role as a service centre, and provide an increase in the labour supply. This should encourage existing businesses in the area to expand, and also attract new firms to the town. Such development will also strengthen the viability and vitality of the town centre, and can enable the provision of new community facilities for the town's existing and future population and that of its hinterland on a day to day basis, supporting and enhancing the town's critical role as a service centre in the district; a truly sustainable community.
28. The inclusion of Fakenham as a Principal Settlement, and the identification of a major urban expansion to the north of the town (Policy SS8) is, therefore, welcomed and supported.

Conclusion & Recommendation

29. The overall spatial strategy, including the settlement hierarchy is considered sound. It accords with national policy, and notably regional policy which emphasises the importance of market towns. The concern is that the subsequent policies in the NNCS will not implement the strategy appropriately as too much development is directed to the Service Villages, which has not been proven to be appropriate or deliverable, and will dilute the sustainability and community benefits that will arise from the proposed development in the District. In this respect the strategy fails soundness tests 4 and 7.
30. The concerns in respect of the distribution of development can be remedied by increasing the amount of development allocated to the Principal Settlements relative to the Service Villages, and by ensuring the additional allocations required to remedy the over reliance on windfall delivery is focussed on the Principal Settlements.
31. The inclusion of Fakenham as a Principal Settlement, and the identification of a major urban extension to the north of the town is supported. Indeed, that site has significant capacity to accommodate more than the 800 dwellings and 7ha of employment currently allocated to it (Policy SS8). Therefore, in light of the objectives and criteria outlined above, it is clear that a more sustainable approach to the distribution of housing in the District would be to focus a greater amount of development into the major urban extension to the north of Fakenham.