



Taylor Wimpey Developments Ltd / 1003 / Rep 4082 /
Spatial Vision & Strategy / Tests 4 & 7
Wednesday 5th December 2007

SUBMISSION STATEMENT
North Norfolk District Council Core Strategy Examination in Public

Submission on behalf of Taylor Wimpey Developments Ltd
Taylor Wimpey Developments Ltd / 1003 / Rep 4082 /
Spatial Vision & Strategy / Tests 4 & 7
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Prepared by
DLP Planning Ltd

October 2007

1. INTRODUCTION

- 1.1 This Report had been prepared by DLP Planning Ltd on behalf of Taylor Wimpey (formerly Taylor Woodrow) Ltd following the submission of representations to the various stages of the North Norfolk District Council Core Strategy Development Plan Document production process. This document expands upon the representation submitted under reference Taylor Woodrow Developments Ltd / 1003 / Rep 4082.

- 1.2 Our representations upon the Submission Draft of the North Norfolk Core Strategy DPD are made in the context of promoting land to the east and west of Yarmouth Road, North Walsham, located to the south of the existing settlement to provide for a sustainable residential extension to the town.

2. REPRESENTATION

- 2.1 Our representation is an objection to Policy SS1 of the submitted North Norfolk Core Spatial Strategy on the basis of soundness tests 4 and 7 of PPS12 paragraph 4.24. Our representation stated:-

'This policy explicitly only plans for the provision of 70% of housing at settlements where it would be appropriate to allocate land for development on a large scale. This seems at odds with the sentiments of para 2.4.4 wherein the difficulties of ensuring affordable housing provision in smaller schemes is acknowledged, as well as the need to ensure that development contributes towards essential infrastructure requirements. In the absence of evidence of absolute constraints to development at the Principal and Secondary settlements we consider that housing provision at these settlements should be maximised' (rep 4082).

3. SUBMISSION

- 3.1 In PPS3 Housing, at paragraph 10, the Government sets out planning for housing policy objectives. It notes that one of the specific outcomes that the planning system should deliver is:-

'Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure'

- 3.2 This theme is taken through to the Secretary of State's Proposed Changes to draft RSS14. Proposed text at paragraph 3.21 states in part that:-

'There is an acute shortage of affordable housing in many rural areas. Responding to this challenge is a priority if significant sectors of the community are not to be excluded by high house prices. The provision of new homes in market and other towns can increase support for services such as schools, health facilities and shops... Other rural settlements, including small villages, may have local housing needs that can best be met at those settlements rather than concentrating all housing at towns and key service centres, but care should be taken to ensure new development is directed to locations where it will have the greatest benefits for rural sustainability.'

- 3.3 Paragraph 2.4.4. of the submitted Core Strategy states that the plan's spatial strategy '*seeks to maximise housing allocations on large sites in the towns and larger villages, as these are most likely to deliver high proportions of affordable housing*'. This being a priority for the District identified in the North Norfolk Sustainable Community Strategy.

- 3.4 In this context, we call into question the framework provided by Policy SS1 Spatial Strategy with regard to its proposed distribution of development across the

proposed settlement hierarchy of Principal Settlements, Secondary Settlements and Service / Coastal Service Villages. This policy proposes a broad distribution of development as follows:-

- Principal Settlements – approximately 50% of new homes;
- Secondary Settlements – approximately 20% of new homes.

The balance would be provided within the remainder of the District with some emphasis on the Service / Coastal Service Villages.

3.5 Policy SS3 sets out the proposed distribution of Housing. Adopting the Council's upper allocation range and windfall assumptions, development would be distributed in approximately the following proportions:-

- Principal Settlements – approximately 47% of new homes;
- Secondary Settlements – approximately 17% of new homes;
- Service / Coastal Service Villages – approximately 18% of new homes.

From this it is apparent that only some 64% of the proposed housing distribution is expected to be provided at the Principal and Secondary Settlements in the District. Furthermore, some 18% is expected to take place in the rural areas beyond the Service / Coastal Service Villages.

3.6 In our submission, this relative proportionate split is inappropriate. There are no capacity constraints at the Principal Settlements that would suggest that as the most sustainable locations for new housing development in the District, they are not capable of accommodating a greater proportion of housing than is proposed in Policy SS1.

- 3.7 In a similar vein and in contrast with emerging RSS14 guidance, it is not apparent that in presuming a significant level of provision beyond the Service / Coastal Service Villages that the Council has given appropriate consideration to ensuring that *'development is directed to locations where it will have the greatest benefits for rural sustainability'*.
- 3.8 One of the key facets of the planning system is that it should endeavour to deliver certainty for all of its users. In this context and given the acknowledged need to increase the provision of affordable housing, it seems curious that the Council is not endeavouring to maximise the delivery of housing at locations where it is understood that the provision of affordable housing, alongside other community benefits, can be relatively easily achieved.

4. Conclusions

- 4.1 In conclusion we do not consider that the proposed proportionate split of housing provision set out in Policy SS1 of the submitted Core Strategy is appropriate. It does not, in our view, appropriately reflect Government guidance in PPS3 Housing, the emerging RSS14 nor do we consider it to be an adequate response to the concerns identified in the North Norfolk Sustainable Community Strategy in relation to the provision of affordable housing.
- 4.2 In the absence of evidence to suggest that there is no capacity for greater levels of housing provision at the Principal Settlements and similarly, no clear indication that the level of proposed provision in the rural areas beyond the Service / Coastal Service Villages can be achieved in such a way that maximises sustainability (it should be noted that this element of provision is effectively 'un-planned' wholly comprising of windfall development) then we consider that Policy SS1 should be amended to ensure that at least 70% of new housing provision should be located at the Principal Settlements.



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