

Session 4

Respondent number: 1045

Town Strategies

STATEMENT OF CASE

BARTON WILLMORE  
ON BEHALF OF

SUTHERLAND HOMES LIMITED

November 2007

## **SUMMARY OF OBJECTION**

This statement refers to the following objections.

### **Policy SS7 Cromer**

#### ***Housing Supply***

Housing targets for Principal Settlements, and particularly Cromer, should be increased. In Cromer this should be to at 1,500 dwellings over the plan period of which at least 600 dwellings provided on newly identified sites.

#### ***Affordable Housing***

Cromer needs to provide 530 units per annum if the level of Affordable Housing need of 159 per year is to be met from 30% of market sites. At present Cromer will fall well short of this target.

#### ***Employment***

Cromer is a net importer of employees from Sheringham and Wells-next-the-Sea. If no new employment allocations are put forward at this stage, then it is far more likely that residents will decide to out commute, probably to Norwich. Employment allocations within Cromer should therefore be increased.

#### ***Sewerage***

What are the sewerage capacity constraints which prevent further development in Cromer (until 2011), Sheringham (until 2011) and Stalham (until 2016)? We must have this properly explained and need a detailed statement on this matter from the relevant drainage authorities.

## **Policy SS7 - Cromer**

### **Housing Supply**

- 1.1 Policy SS7 (Cromer) states that the town is designated as a Principal Settlement with a large town centre. Between 2001 – 2021 a total of between 1,000 and 1,150 dwellings will be built. This figure includes 400 – 450 dwellings on newly identified development sites well related to the built up area where encroachment into the wider countryside setting of the town will be minimised.
- 1.2 The policy also identifies the realistic need to build on Greenfield land. In line with comments made on Policy SS3, we strongly believe the housing figures need to be increased over the whole District, and that provision will ultimately need to run until 2026, 15 years after the plan is adopted.
- 1.3 The Core Strategy identifies Cromer as having the highest recorded level of housing need within all of North Norfolk's urban areas. The town also has one of the highest populations of any urban area within North Norfolk, only surpassed by Fakenham. It is clear that the need should be provided in Cromer, especially when one considers the affordable housing requirement within the town identified within the Housing Needs Assessment 2007 (159). It seems strange that on the above evidence 300 more dwellings are proposed in Fakenham. Both towns are similar in terms of population and although some parts of Cromer are restricted by AONB designations, large parts are unaffected. Fakenham, however, is severely limited by flood plains and it seems unrealistic to expect 1430 extra dwellings to be built in this location over the plan period.
- 1.4 If allocations need to be made for 6152 units (see housing paper) to meet the minimum of 8,000, then Cromer (assuming the same 15% proportion in the existing table - Policy SS3 (lower range)) should meet  $6152 \times 15\% = 923$  on identified sites. Therefore all Site Specifics Allocations previously identified (November 2006) need to be used, plus a number of other sites that are currently unidentified.
- 1.5 On the basis of this statement and representations made in respect of Policy SS3, it is considered that the figure of 400-450 dwellings to be provided as new allocations will not provide adequate supply to meet the RSS dwelling completion requirements for Cromer. We, therefore, believe that the revised total should amount up to at least 600 dwellings to be provided on newly identified land. We also believe the housing targets for Cromer should be increased to 1,500 dwellings over the plan period.

## **Affordable Housing**

- 1.6 Cromer would need to provide 530 units per annum if the level of Affordable Housing need of 159 per year is to be met from 30% of market sites. This is greater than the 400 unit per annum total for the whole of North Norfolk. In practice Cromer can only expect to meet 135 Affordable Dwellings over the remaining period to 2021 (450 x 30%) and therefore the figure of 159 is completely unrealistic and will not be achieved. We believe that the target for affordable dwellings for Cromer should be stated.

## **Employment**

- 1.7 Cromer is a net importer of employees from Sheringham and Wells-next-the-Sea. If no new employment allocations are put forward at this stage, then it is far more likely that residents will decide to out commute, probably to Norwich. Employment allocations within Cromer should therefore be increased.

## **Sewerage**

- 1.8 We are very concerned at the Sewage Capacity embargo on further development in Cromer (until 2011), Sheringham (until 2011) and Stalham (until 2016). We must have this properly explained as it will be an impediment on all developments in the short term in the aforementioned settlements. We therefore request that the relevant drainage authorities prepare a statement on the extent of commitments affected by these embargo's and what their investment programme is likely to be.

## **Other Town Policies SS8-SS14**

### ***Fakenham***

- 1.9 If allocations need to be made for 6152 units (see housing paper) to meet the minimum of 8,000, then Fakenham (assuming the same 30% proportion in the existing table - Policy SS3 (lower range)) should meet  $6152 \times 30\% = 1846$  on identified sites. At present this figure is only 800-900. The net annual need for affordable housing provision in Fakenham is only 43. This seems low when one considers the high level of housing expected until 2021.

### ***Holt***

- 1.10 Between 100-150 new dwellings on previously unidentified sites are expected within Holt. The net annual need for affordable housing provision in Holt is only 23. Holt is one of the smallest identified towns worthy of a Town Strategy Policy. Holt is also located in a sensitive area in terms of environmental constraints, Consequently, it is surprising to see such a large number of dwellings proposed on newly identified sites.

### ***North Walsham***

- 1.11 If allocations need to be made for 6152 units (see housing paper) to meet the minimum of 8,000, then North Walsham (assuming the same 15% proportion in the existing table - Policy SS3 (lower range)) should meet  $6152 \times 15\% = 923$  on identified sites. At present this figure is only 400-500. The net annual need for affordable housing provision in North Walsham is 53.
- 1.12 We are concerned that Policy SS10 does not refer to infrastructure constraints in paragraph 2.9.19. This is a major omission and if as stated, there are major infrastructure constraints in respect of energy supply and foul sewerage network capacity, growth will be delayed until 2016, leaving only five years of the initial plan period remaining. We urge that this policy is amended to mention the constraints listed at paragraph 2.9.19 or these constraints are defined.
- 1.13 RAF Coltishall ceased military operations in April 2006. The site was a major employer within the locality and the net employment loss is not met in North Walsham through increased employment opportunities. If the employment loss is not being met in North Walsham, where exactly in the Core Strategy is it being met?

### ***Hoveton***

- 1.14 Between 100-150 new dwellings on previously unidentified sites are expected within Hoveton. The net annual need for affordable housing provision in Hoveton is not listed within the Housing Needs Survey 2007 and needs to be included within this document.
- 1.15 Hoveton is the smallest settlement to be granted a Town Strategy Policy, even though many would not class it as a town. For this reason it seems strange that 100 – 150 dwellings should be found on newly identified development sites. We strongly believe this figure should be only 50 dwellings, and the remaining 100 should be found in the larger settlements within the District.

### ***Sheringham***

- 1.16 If allocations need to be made for 6152 units (see housing paper) to meet the minimum of 8,000, then Sheringham (assuming the same 7.5% proportion in the existing table - Policy SS3 (lower range)) should meet  $6152 \times 7.5\% = 462$  on identified sites. At present this figure is only 200-250. The net annual need for affordable housing provision in Sheringham is 37.
- 1.17 Although Sheringham is designated a Secondary Settlement under Policy SS1, it is worthy of a Town Strategy Policy under SS12. We strongly believe that due to the range of facilities and infrastructure on offer within the town, the overall figure of 200-250 dwellings on newly identified land should be increased to at least 350.

### ***Stalham***

- 1.18 Policy SS13 states that Stalham should accommodate 150-200 dwellings on newly identified sites before 2021. However, there is a major uncertainty as to whether this can be achieved when one considers that allocated development will not be permitted prior to 2016 unless sewerage treatment capacity has been improved. On this basis it seems unwise to allocate up to 200 dwellings on newly identified sites, when they could easily be accommodated elsewhere in the North Norfolk's larger towns that do not face the same sewerage problems.

### ***Wells***

- 1.19 Wells-next-the-Sea has been designated 150-200 dwellings on newly identified land. The net annual need for affordable housing provision in Wells is 33.
- 1.20 Wells-next-the-Sea is a small settlement with a Secondary designation under Policy SS1. The town has a small confined town centre. Again the question has to be asked, why 150-200 new dwellings on unidentified land in such a small location?
- 1.21 Again we feel that a paper covering the sewage constraints within the town and the District is required to inform the wider public of the infrastructure problems faced. Reference to the resolution of these constraints preceding development should be deleted from the town strategies.

### **Conclusions**

- 1.22 From experience it is unusual for a Plan to have a strategy for each town, as this Plan does. Usually housing allocations and employment allocations for each town are listed under the housing and employment policies. NNDC have gone out of their way to consult the public on "whole settlement" strategies and this has carried through to the Plan.
- 1.23 We conclude that the amount of land needed for housing needs to be increased for the main larger towns. This follows the argument in our housing paper (session 5) that the Council have not allocated sufficient land in accordance with the Regional Spatial Strategy for the East of England, Housing Policies H1 and H2.
- 1.24 Further to the above, Cromer need to provide 159 affordable houses a year, which equates to 530 units per year (30% of market sites). This is far greater than the 400 unit total for the whole of North Norfolk and it is advised that if Affordable Housing targets are to be met, identified land for housing needs to be increased for Cromer.
- 1.25 Cromer is a net importer of employees from Sheringham and Wells-next-the-Sea. If no new employment allocations are put forward at this stage, then it is far more likely that residents will decide to out commute, probably to Norwich. Employment allocations within Cromer should therefore be increased.
- 1.26 We are very concerned at the Sewage Capacity embargo on further development in Cromer, Sheringham and Stalham. We must have this properly explained as it will be an impediment on all developments in the short term in the aforementioned settlements.

