

Town Strategies

1. Trinity College Cambridge (TCC) welcome the approach the North Norfolk Core Strategy (NNCS) has taken to setting out individual town strategies for the identified Principal and Secondary Settlements, as this reflects the character of the District as a whole, and allows the NNCS to appropriately address the unique circumstances and requirements of the individual settlements within it.
2. Moreover, the strategy to meet a significant proportion of the housing requirement through the delivery of sustainable urban extensions at the Principal Settlements is supported by TCC, particularly at Fakenham.
3. For the North Norfolk area, and Fakenham in particular, this strategy has to be the right approach to ensure that the benefits for the settlements and their hinterlands are maximised in realising the rate of development required to meet the housing needs identified in the East of England Plan (RSS). Urban extensions in this context are best able to provide the balance of homes, employment opportunities and supporting services and infrastructure, required to deliver the sustainable, inclusive and mixed communities referred to in PPS3.
4. The sustainable urban extensions at the Principal Settlements also offer greater benefits in terms of the delivery of complementary facilities and infrastructure that reduces the burden on public sector funding, and can speed delivery.

Fakenham

5. Of the Principal Settlements identified, Fakenham is particularly well-placed to meet the strategic development requirements of North Norfolk over the next 15 years. Therefore, its identification as a Principal Settlement, and the strategy highlighted for its future development is welcomed and supported; particularly the specific identification of a major urban expansion to the north of the town.
6. Fakenham 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. The importance of its role 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.

7. 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). This is appropriately reflected in Policy SS8 which sets out the policy strategy for Fakenham.
8. The significant residential and employment development proposed will 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. The 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.

Land to the North of Fakenham

9. The Land North to the North of Fakenham is the most sustainable and deliverable development option for the town and District. TCC share a strong desire with NNDC to create an exciting, sustainable urban extension which would have a key role in shaping the town’s future. Moreover, the site has the capacity to make a significant contribution meeting the District’s housing, including affordable, and employment requirements as established by the RSS.
10. The site is available, suitable and viable and therefore it meets the requirements of PPS3. Notably there are relatively few environmental, physical and ownership constraints to the development of the site. It is not subject to any specific landscape designations or constraints, and has no ecological or historic features of acknowledged importance. This has been confirmed in a number of feasibility, environmental and technical assessments that have been undertaken on behalf of TCC, and have been supplied to NNDC.

11. Initial Masterplan Options for the site have also been prepared on behalf of TCC and submitted to NNDC for their consideration. These highlight how the allocation requirements could be delivered through the delivery of a comprehensive mixed-use development that is well integrated with the existing town, and emphasises the existing character and identity. It would provide a range of housing types and sizes, including a significant amount of affordable housing, employment land and community facilities, including a new primary school and recreation space, to ensure the development of a balanced and sustainable community.
12. The proposed development would create a new northern edge to Fakenham, with new pedestrian, cycle and public transport links that would integrate it with the existing town and communities, notably connecting it to the existing employment sites, and various community and leisure facilities. The transport strategy advocated by the Masterplan has been agreed in principle with the Highways Authority.
13. The implementation of this Masterplan will ensure that the vision for Fakenham set out in Policy SS8 is realised. The advanced nature of the proposals highlight its importance to realising the established planning policy imperatives for the area, and the wider social, economic, sustainability and environmental benefits that would flow from the required growth of the town and District. Accordingly the priority attributed to the development of the land to the North of Fakenham in the NNCS policies is very much supported.
14. The indication in Policy SS8 that the Land to the North of Fakenham area will provide a total of 800 dwellings in the period to 2021 is welcomed, but it is apparent from the masterplanning exercise that has been undertaken that the area has the capacity to accommodate additional development over and above that currently allocated to it in the NNCS (up to 1,400 dwellings at 40 dwellings per hectare).
15. Separate representations have been submitted by TCC to the NNCS that assert that the proposed housing provision set out in Policy SS3 relies too heavily on the delivery of windfall sites. Moreover, that other locations being considered as potential development sites are inappropriate in PPS3 terms. There is a very real risk, therefore, that a shortfall in housing provision may arise over the plan period. Some, or all, of this potential shortfall could be accommodated on the Land to the North of Fakenham.
16. This would allow the full logical extent of the development to be delivered optimising sustainability and place-making, and provide an appropriate context for the delivery of social and physical infrastructure provision, in accordance with national planning policy,

the RSS and the NNCS's own development strategy as set out in Policy SS1. This can be considered in further detail in the preparation of NNDC's Site Allocations Development Plan Document.

Infrastructure Provision in Fakenham

17. Policy SS8, as currently expressed, however, could compromise the ability to ensure that housing supply meets identified needs in the District, and that the critical issues of accessibility to housing and affordability in the town are addressed.
18. In their representations TCC were specifically concerned with the first bullet point of the policy which states that the urban expansion will not be permitted until 2016 unless sewage treatment capacity has been improved. It is entirely correct that future development should be supported by the timely delivery of appropriate infrastructure, services and facilities, but the constraint on the grant of planning permission would result in an unnecessary delay in the development process, and clearly if there has to be a constraint, it should be on the occupation of the new development.
19. More fundamentally, however, whilst sewerage capacity is an important issue, TCC are concerned that the very specific nature of the reference is inappropriate and too restrictive.
20. In light of the Government's policy imperative to deliver a step change in the supply of housing, it is not accepted that the NNCS should simply limit development until the infrastructure is in place. The NNCS should seek to ensure housing needs are met by identifying and facilitating the delivery of strategic infrastructure through the creation of a positive policy context in accordance with the intent of the Housing Green Paper (Chapter 5), that seeks to meet the overriding policy imperative of housing growth through long term infrastructure planning stage to deliver the strategically important developments required to meet its core aims.
21. It is, therefore, incumbent on NNDC and the service providers, as well as the private sector (land owners/developers), to take a pro-active approach to identify the requirements and facilitate their provision at the earliest opportunity, and that should be reflected in Policy SS8, as well as other policies in the NNCS, notably Policy SS6.
22. The NNCS needs to be more explicit and constructive in terms of how the infrastructure should come forward to serve the development. That might for example, optimise the potential to secure public and private funding, bring forward priority investment

programmes, examine the potential for demand reduction, and seek to prioritise spare existing capacity for the strategic development.

23. In fact the process has already started at Fakenham. NNDC and consultants acting for TCC have independently liaised with Anglian Water specifically in respect of the sewage treatment capacity issue. Those discussions indicated that there is in fact spare capacity for 400-500 new dwellings in the town, which allows the development to begin much earlier than currently indicated in Policy SS8. Indeed the policy should be earmarking this spare capacity for the urban extension which is best able to provide the investment required to improve the infrastructure base of the town, and deliver the affordable housing sought.
24. Ultimately, however, a strategic solution is required to accommodate the full extent of the anticipated development in the town. Anglian Water will conduct their next Capital Investment Review in June 2008. If there is some certainty in the development planned for the town by then, the infrastructure requirements can be included in that Capital Investment Review, and subsequently implemented around 2012. Clearly the NNCS has an absolutely critical role in providing that certainty to Anglian Water, and facilitating the infrastructure provision required to support the full development planned for the town. That will allow it to come forward at the earliest opportunity to meet identified development needs in the District in accordance with national and regional planning policy (Policy H1).

Other Settlements

25. TCC have submitted representations on the distribution of housing in the District over the plan period, as set out in the table in Policy SS3, which is of course reflected in the individual town strategies.
26. The substance of their concern is that there are significant development constraints in some of the principal and secondary settlements, notably Cromer, Holt and Sheringham, and inevitably in the Service Villages. For example land around Cromer and Sheringham lies within a designated Area of Outstanding Natural Beauty. Other urban sites to be considered for housing are in employment use or to rely on the relocation of existing uses.
27. Representations to the earlier Site Specific Proposals Preferred Options Consultation highlighted that the appropriateness and deliverability of a number of the sites that were being promoted as potential development allocations is questionable. There is,

therefore, little evidence to suggest that this anticipated amount of housing can be delivered in those locations.

28. 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.
29. The land north of Fakenham has considerably greater capacity to accommodate more than the 800 dwellings and 7ha of employment currently allocated to it (Policy SS8), yet the scale of allocations in Fakenham has remained the same. 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 in the major urban extension north of Fakenham, as this location is better placed than the other locations highlighted above to accommodate new development.
30. As an absolute minimum, there should be an explicit recognition in the NNCS that if the scale of development anticipated in the other settlements cannot be proven to be delivered at the site allocating stage, then the residual development requirement should be directed to the land north of Fakenham.

Conclusion and Recommendation

31. The inclusion of individual town strategies for the Principal Settlements in the District, and proposed strategy for Fakenham, particularly the intention to develop a major urban extension to the north of the town, are strongly supported and welcomed. Indeed it is apparent that the area has significantly more capacity than the development currently allocated to it, and that should be utilised in preference to other locations where there is some uncertainty in respect of their appropriateness and deliverability.
32. However, the very specific restriction in Policy SS8 on future development in the town is unsound in light of the Government's policy imperative to increase the supply of housing. Consequently the policy should be revised to create a positive policy context that seeks to facilitate the development, and provide the certainty required to ensure that the necessary infrastructure provision is planned and procured expeditiously.