

**FURTHER STATEMENT – DAY 4 – FRIDAY 7 DECEMBER 2007**

1. **General Approach**
2. **Sheringham**

**What part of the strategy is unsound?**

1. 2.9 Town Strategies and Policy SS12 – Sheringham

**Which test of Soundness does it fail and how?**

2. The strategy fails to represent the most appropriate in all circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

General Approach to the Town Strategies

3. In considering whether the general approach to the Town Strategies is sound, it is important to consider some of the background information that has been assembled by the District Council and described within Section 1.3 (Spatial Portrait) and Section 1.4 (Key Issues and Challenges) of the Core Strategy. These sections highlight the difficulties facing the District and the importance of tourism to the local economy. Section 1.3 describes North Norfolk's distinctive environment and the importance of this to the local economy through tourism (paragraph 1.3.3). Paragraph 1.4.3 describes the North Norfolk economy as being "*dominated by tourism and the service sector*" and that there has been a decline in the number of jobs in manufacturing. Paragraph 1.4.4 describes the economic prosperity of North Norfolk as being irrevocably linked to the success of the tourism sector. The spatial portrait of the District describes the area as being affluent overall but that there are pockets of social deprivation especially in the east. Paragraph 1.3.16 describes the poor level of public transport serving two of the District's seven towns namely Stalham and Holt. Paragraph 1.4.6 recognises that it is important to ensure that leisure, retail and service facilities are provided locally which is difficult in the context of a centralisation of services and competition from a concentration of retail in fewer larger centres. The paragraph also recognises that North Norfolk's retail centres play an important role in meeting day to day shopping needs as well as the broader needs of day trippers and tourists. The tourism and visitor market is described as helping to underpin the vitality and viability of a number of the District's towns but that they also create seasonal fluctuations.
4. Whilst the general approach to translating the key issues and challenges facing North Norfolk District into Town Strategies appears

appropriate with respect to the towns of Cromer, Fakenham, Holt, Hoth and North Walsham and Wells, having more knowledge of Sheringham and Stalham and the issues faced by each of these towns, it would seem that the Vision and Strategy for each does not adequately address the issues they face.

### Sheringham

5. The Vision for Sheringham describes the town as a local service centre yet its population is consistent with that of Fakenham and Cromer and double that of Holt's. Its role therefore is wider than just that of a local centre. Indeed, the Town Strategy recognises that Sheringham is an attractive seaside town with many tourist attractions and that it attracts visitors throughout the year on day trips, short breaks and longer stays. This contrasts with other towns within the District that are described as having fluctuating tourist and holiday maker attractions.
6. Paragraph 2.9.32 of the Core Strategy in relation to Sheringham recognises that the town does not have a modern supermarket and that many people go to Cromer or elsewhere for their weekly food shopping. This represents unsustainable travel patterns. Whilst Sheringham may not have the level of employment that towns such as Cromer and Fakenham generate, the permanent population of the town along with its attraction of the visitors throughout the year on day trips, short breaks and longer stays (paragraph 2.9.28 of the Core Strategy) would suggest that the Town Strategy should recognise the need to provide a modern supermarket facility to service these populations.
7. The officer's report to the Development Control Committee (West) on the 2<sup>nd</sup> November 2007 in respect of a planning application for a Tesco supermarket in the town recognises the need for such a facility and confirms that the location promoted and the scale of the store is consistent with the tests contained within PPS6.
8. The town strategy for Sheringham makes reference to the town as a Secondary Settlement. In this regard, please find attached as an Appendix a copy of the Statement prepared in respect of the AM Session that took place on Day 3 of the Examination in relation to the Spatial Vision and Strategy.
9. The Town Strategy for Sheringham, SS12, should be amended as follows:  
*"Sheringham is designated as a town within North Norfolk District. The following development is proposed:"*.
10. In addition, a further bullet point should be included. This could read as:  
*"1,500m<sup>2</sup> of net sales convenience goods floorspace will be accommodated on an appropriate site within the town"*.

**APPENDIX 1**

**FURTHER STATEMENT – DAY 3 – THURSDAY 6 DECEMBER 2007**

**FURTHER STATEMENT – DAY 3 – THURSDAY 6 DECEMBER 2007**

**SPATIAL VISION & STRATEGY Cont.**

**1. Secondary settlements**

**What part of the strategy is unsound?**

1. Policy SS1 of the Spatial Strategy is unsound.

**Which test of Soundness does it fail and how?**

2. The Strategy is not in general conformity with the Regional Spatial Strategy (test of soundness 4C) and is inconsistent with national planning policy (test of soundness 4B). In addition, the strategy fails to represent the most appropriate in all circumstances, having considered the relevant alternatives, and they are not founded on a robust and credible evidence base.

**Secondary Settlements**

3. A majority of this text is contained within our Statement in relation to the Sessions on Day 2 of the Examination. It is relevant to discussion in relation to Secondary Settlements as it is considered that the District Council has erred when making a distinction between Principal and Secondary Settlements.
4. Establishing the right hierarchy for the District is crucial as this then has a significant bearing on the approach to development control policies.
5. Section 1.3 (Spatial Portrait) and Section 1.4 (Key Issues and challenges) highlight the difficulties facing the District and the importance of tourism to the local economy. Section 1.3 describes North Norfolk's distinctive environment and the importance of this to the local economy through tourism (paragraph 1.3.3). Paragraph 1.4.3 describes the North Norfolk economy as being "*dominated by tourism and the service sector*" and that there has been a decline in the number of jobs in manufacturing. Paragraph 1.4.4 describes the economic prosperity of North Norfolk as being irrevocably linked to the success of the tourism sector. The spatial portrait of the District describes the area as being affluent overall but that there are pockets of social deprivation especially in the east. Paragraph 1.3.16 describes the poor level of public transport serving two of the District's seven towns namely Stalham and Holt. Paragraph 1.4.6 recognises that it is important to ensure that leisure, retail and service facilities are

provided locally which is difficult in the context of a centralisation of services and competition from a concentration of retail in fewer larger centres. The paragraph also recognises that North Norfolk's retail centres play an important role in meeting day to day shopping needs as well as the broader needs of day trippers and tourists. The tourism and visitor market is described as helping to underpin the vitality and viability of a number of the District's towns but that they also create seasonal fluctuations.

6. Each of the settlements described as either a Principal Settlement or a Secondary Settlement within North Norfolk have differing roles. All except Fakenham and North Walsham are heavily influenced by seasonal tourism. Three are coastal towns and are influenced by tourism and other holiday makers this brings. They also serve abnormal catchments in that they are effectively halved due to the coastal location. Holt being close to the coast is also influenced by seasonal holidays makers. Stalham and Hoveton (along with Wroxham located within the adjoining District) service those holidaying within or around the Norfolk Broads.
7. The six centres more influenced by significant changes in the number of people they are required to service also have a permanent population that needs to be provided with access to appropriate services and facilities.
8. Scenario C of the Council's Core Strategy: Options Consultation document (Document G2), sought to target new development to address local issues. This would appear to be the most appropriate strategy for the District. The effect of specifically defining different settlements as Principal or Secondary may however be to limit development that might otherwise come forward within one of the settlements that may appear smaller due to the permanent population it serves but in actual fact has a role beyond just accommodating for the needs of the permanent residents.
9. The Council's main options for the settlement hierarchy are related to the location of housing development. Responses to consultation identified the best option as concentrating new development in existing towns and larger villages (Core Strategy paragraph 2.3.4). The Core Strategy Sustainability Appraisal at Appendix G (Document A2) contains "*Baseline Information for Principal and Secondary Settlements*". The text within the appraisal at paragraph 5.8 indicates that the basis for identifying Principal Settlements is their role as centres for retail, employment and services in North Norfolk but in particular as they are net 'importers' of people working in the towns, ie. more people come to these towns to work than leave to work elsewhere (Cromer, Fakenham Holt). Secondary Settlements are described as fulfilling a more local role for the surrounding populations.

10. This approach does not appear to have considered the roles, to varying degrees, that all of the centres have in facilitating the tourism industry within Norfolk. It has only considered the permanent population. Tourism is described within the Core Strategy as a major source of local income and employment (see paragraph 5 above and Section 1.3 and 1.4 of the Core Strategy). Given the importance of this industry and therefore the ability of all of the seven towns and large village of Hoveton to contribute to supporting it, any settlement hierarchy must not directly or unwittingly compromise this economic driver. See paragraph 2.1.4 of the Vision for North Norfolk and paragraphs 2.1.9 – 2.1.16. To every town, tourism is described as important.
11. Core Aim 2 within Section 2.2 appears to drive the Settlement Hierarchy described within the Core Strategy. The aim is “to concentrate development in the settlements that have the greatest potential to become more self contained and to strengthen their roles as centres for employment, retailing and services”. The Core Strategy Sustainability Appraisal (Document A2) at paragraph 5.8 identifies Cromer Fakenham, Holt and North Walsham as the Principal Settlements (see paragraph 9 above). The paragraph explains that the self containment of these towns can be enhanced by “locating further development there, and they will receive larger amounts of growth than the Secondary Settlements of Sheringham, Stalham, Wells and Hoveton which fulfil a role more as local centres for surrounding populations”.
12. Appendix G of the Core Strategy Sustainability Appraisal contains baseline information for the Principal and Secondary Settlements. This information which is based on the permanent population within the district appears to have formed the basis for establishing the Settlement Hierarchy. The methodology does not appear to have considered tourism on which the “*economic prosperity of North Norfolk is irrevocably linked*”. The aim (Core Aim 2) is explicit in its intention to strengthen the towns that are already described as being strong. This could be at the expense of the four other towns in the District. Section 1.3 of the Core Strategy, particularly paragraphs 1.3.8 and 1.3.15 recognises that there are pockets of social deprivation in the east of the District. Stalham is highlighted within this paragraph along with Hoveton and North Walsham.
13. It is appropriate to identify need for employment, housing and other development of differing scales within each of the District's towns as this is responding to the specific needs of each particular town and therefore the District overall. Describing some as Principal Settlements and some as Secondary Settlements however, could have the effect of hindering development within towns with smaller permanent populations for example, as it does not allow sufficient flexibility and therefore may constrain or prevent an even distribution of facilities,

employment opportunities and housing across the District. It will encourage development in the larger settlements. By potentially and unwittingly discouraging it in the smaller settlements there will be a knock on impact on infrastructure and service provision. In the smaller towns permanent residents may then be denied services that they require and holiday makers the facilities they need to make their visit or stay more enjoyable. Paragraph 1.4.6 of the Core Strategy illustrates this point where it describes the fluctuating populations within a number of the District's towns which coupled with an increasing centralisation of service provision in fewer larger centres is making it increasingly difficult for members of the community to access essential services.

14. The towns that play a role in supporting tourism are just as important as those that support a more permanent population. It is therefore important that the Spatial Strategy does not unduly discourage development in some centres whilst encouraging more of it in others.
15. The policy is sending the wrong message about smaller more fragile yet "attractive" towns like Stalham. The settlement hierarchy will be seen by investors as conferring second class status to towns like Stalham, Sheringham and Wells where development is not especially encouraged or preferred. It suggests that infrastructure investment by the Local Authority and others will be focussed in the Principal Settlements. Yet it is the places like Stalham that are recognised to have substantial problems (paragraph 1.3.15 and 1.3.16 of the Core Strategy).
16. Subdivision of the District's towns is inappropriate as they have wide ranging roles and functions which make it difficult to classify the settlements in any meaningful way. Principal and Secondary could result in the rejection of what could be good in one of the towns considered to be Secondary. This may not necessarily be a decision made by the District Council but a would be investor or resident.
17. It is noted that within the Secretary of State's Proposed Changes and Further Proposed Changes to the draft revision to the Regional Spatial Strategy for the East of England that Policy SS4 identifies Market Towns and other towns as locations other than regional "Key Centres" within which development ought to be accommodated. Below this the RSS refers to key service centres described as large villages. Both the Secondary Settlements and the Principal Settlements within North Norfolk would appear to reflect the description of "Towns other than Key Centres" within the RSS and all are market towns rather than large villages (except for Hoveton). The Council's Settlement hierarchy would appear to be at odds with this.
18. Establishing the settlement hierarchy has consequences when it comes to considering the town centres themselves. It is therefore relevant to consider Policy E5 of the East of England Plan which

requires that local development documents identify a network of centres below those specifically identified within the RSS as of regional strategic importance. It is noted that none of the centres in North Norfolk are considered to be of regional strategic importance. The hierarchy below the identified centres is referred to as town centres, district centres, neighbourhood centres and village centres.

19. All of the centres referred to as either Principal Settlements or Secondary Settlements within North Norfolk, except for perhaps Hoveton have the characteristics of a town centre as described in PPS6. They are more than just district centres both in terms of their size and the role each of them plays. The approach to the town settlement hierarchy within North Norfolk does not therefore reflect the guidance contained within the East of England Plan as a further level has been unnecessarily added to the identified hierarchy within the region.
20. Advice contained within PPS6 at paragraphs 2.9 and 2.10 which discusses networks and hierarchies of centres, requires planning authorities to consider *“whether there is a need to rebalance the network of centres to ensure that it (the hierarchy) is not overly dominated by the larger centres, that there is a more even distribution of town centre uses and that people’s every day needs are met at the local level”*.
21. Although specifically related to retail, paragraph 5.30 on page 36 of the Council’s Economy Topic Paper illustrates the point. It states that existing policies have tended to adopt a hierarchical approach to the distribution of retail uses and that there is a presumption in favour of most development taking place in the two main town centres of Fakenham and North Walsham and only to a lesser extent the five other designated town centres. It states that this approach fails to recognise and individual and succinct roles that each of the centres play or that there is a relationship between the towns.
22. The structure of the eight town centres within North Norfolk District Council differs from a majority of areas elsewhere in the country. In other Districts a more traditional hierarchy is apparent where you find a number of smaller centres intermingled with a fewer number of larger centres. Those that use the smaller centres on a more frequent basis might then look to the larger centres for goods and services that are less frequently required. Populations do not fluctuate as much and each centre has a more traditional role and catchment.
23. The difficulty is perhaps not with the Local Authority but the perception and message presented to would be investors and residents. Highlighting towns in this way suggests that infrastructure investment is to be focussed in the Principal Settlements. This will encourage the continued development and improvement of the stronger towns potentially at the expense of those classed as secondary.

### **How the Strategy can be made Sound?**

24. In the context of the towns within North Norfolk District Council, identifying Principal and Secondary Settlements could have the undesirable affect of constraining development within what are described as Secondary Settlements and therefore will fail to plan appropriately to address their identified problems and effectively help deliver the vision for their vitality and viability, their character and ability to contribute to the creation of sustainable communities.
25. As described above Scenario C of the Council's Core Strategy: Options Consultation document (Document G2), sought to target new development to address local issues. This appears to be the most appropriate strategy for the District. The effect of specifically defining different settlements as Principal or Secondary may be to limit or even inadvertently discourage development that might otherwise come forward within one of the settlements that may appear smaller due to the permanent population it serves but in actual fact has a role beyond just accommodating for the needs of the permanent residents, ie. to facilitate North Norfolk's main economic driver – tourism.
26. It is considered that Policy SS1 of the Spatial Strategy can be made sound through the removal of references to Principal and Secondary Settlements. The Policy could read

#### ***“Spatial Strategy for North Norfolk***

*The majority of new development in North Norfolk will take place in the seven towns and larger village focussing on meeting their needs and opportunities having regard to particular environmental and infrastructure constraints. The settlements are:*

- i. Cromer, Holt, Hoveton, Fakenham, North Walsham, Sheringham, Stalham and Wells-next-the-Sea.*

*The overall housing provision for North Norfolk will be distributed in accordance with the needs and requirements of each of the towns and will seek to achieve the visions for each place. The strategic policy for each settlement sets out the range of housing and employment provision and other land use considerations.*

*Cont....”*

27. In making this change edits will be required elsewhere that will bring the supporting text in line, ie. reference to the settlements and towns only rather than Principal and Secondary.

28. The Council will need to consider whether Hoveton which is described within the Core Strategy as a large village centre, ought to be included as a service village or whether it does actually play the role of a town or settlement. Hoveton on its own has the role of a service village. However when considered in conjunction with Wroxham it may have has a town or settlement role.