

Delivered by hand on 8th November 2007.

It is our opinion that NNDC have failed to carry out the procedures correctly and failed to involve the community in regards to certain changes that they are proposing in the Core Strategy Document.

We have listed the reasons below for this meeting but as we are unsure about the process of the Examination it may be that some or all of them may relate to a later examination meeting. If this is the case we would be grateful if you would use them at the correct meetings.

1) **SS13 (Stalham High Street.)**

There has been no community involvement regarding the proposed changes to the High Street. We have been led to believe that NNDC were looking at sites for the placement of approx 250 dwellings that would help sustain the High Street. We only learned of the reduction in the High Street as core retail in the Core Strategy Document. We understood that the Core Strategy Document was for site specific details and not for any immediate changes once the Document had passed the tests of Soundness.

NNDC should have informed the Town Council, businesses and the community of this designation change earlier in the LDF process and not just hidden it away inside the Core Strategy Document.

The reason for the changes to the High Street is unsound as they are based on the floor space of the Tesco development to calculate the retail area for the Town. Such a store cannot replace the diversity of the 22 shops that fall within this change. Due to the need for housing the value of the premises that fall within the change would be greatly increased if altered to housing, encouraging the owners to sell for or convert to housing.

We are also unclear about how NNDC have made their calculations, if they have based it on the population of Stalham alone (approx 3,100) this would be incorrect as Stalham serves a further 12 parishes giving a total population of over 12,000. There would also be the increase of the population by the proposed residential dwellings in this document.

Tesco itself has a footfall of approx 14,000 per week, a large number which come from outside of the area, which further increases the number likely to use the high street.

The High Street layout is not suitable to sustain domestic dwellings on this scale and would cause increased traffic congestion and pollution along the high street. We already have problems with surface water and sewage in this area and such a change would put even further pressure on the system.

The loss of these shops would encourage people to shop outside of Stalham and whilst doing so probably get the other shopping that would have been done in the remaining shops. This would be detrimental to the local economy put further pressure on the remaining shops and could eventually turn Stalham into a dormitory town.

If this proposed change should have been included in the Community Involvement then NNDC has failed to carry out the procedures correctly and the Core Strategy Document should automatically fail the Test of Soundness.

If the proposed change falls outside of the Community Involvement procedure then to make the document sound the designation change should be denied.

2) **SS13 (Area Maps)**

Map 28 shows an area between Brumstead Road and Campingfield Lane as Open Space/Recreation Ground. The map does not make it clear if it is a Site Specific item or a Designation change. Neither of these is acceptable to us and makes the map unsound. This area is a closed cemetery and NNDC should have consulted with the Town Council who are responsible for the land and also the relatives of those buried there before including this in the Core Strategy Document.

3) **Representations.** (missing content)

Our Representation contained the following paragraph which appears to have been left out entirely.

2.7.22 states – The Government is committed to strengthening the role of market towns and other service centres and increasing the viability and vitality of such centres. The Sustainable Community Strategy found that a good range of shops emerged as extremely important to residents and one of the areas that is most lacking in many parts of North Norfolk. Consequently ‘better and more varied shops’ is one of the key issues in the Community Strategy.”

SS13 Designation change

The Designation change to the High Street as proposed in the Core Strategy Document seems to go against the Sustainable Community Strategy. The designation change will almost certainly lead to the loss of many of the existing shops, having the opposite effects of what is stated in the Sustainable Community Strategy.

The principle adopted by NNDC of using the floor space of a large supermarket in their calculation goes against one of the key issues of 'better and more varied shops'.

To make this section of the Core Strategy sound the designation change to the High Street should be denied.

4) Submission Stage Representations

Of the two sections that our representation are in it appears that part of our representation has been completely left out (as shown in paragraph 3). NNDC are supposed to record in full all representations and have failed to do so.

NNDC are supposed to list all representations in full and produce a copy of the representation in the Submission Stage Representations document. They have failed to do this as the document does not contain any of the representations that cover the following sections;

Section 3.5 Community & Transport,
CT1 Open Space Designations
CT2 Developer Contributions
CT3 Provision and Retention of Local Facilities and Services
CT4 Telecommunications
CT5 The Transport Impact of New Developments
CT6 Parking Provisions
CT7 Safeguarding Land for Sustainable Transport Uses

In total there are 45 representations missing from the document.

The failure of NNDC to record our representation correctly and with 45 representations completely missing, then this document is incorrect and incomplete and should not be allowed to be submitted.

The lack of such a document at this stage should mean that they automatically fail the tests of soundness.

Signed on behalf of Stalham Town Council on 8th November 2007 by,

A handwritten signature in blue ink, appearing to be 'T A Ross-Benham', with a long horizontal flourish extending to the right.

Mr T A Ross-Benham (Acting Chair)