

Positive Policy Context

1. Trinity College Cambridge (TCC) consider that it is entirely correct that future residential and employment development in the District should be supported by the timely delivery of appropriate infrastructure, services and facilities. Consequently, their submitted representations acknowledged that the North Norfolk Core Strategy (NNCS) rightly emphasised the importance of appropriate infrastructure provision. Furthermore, that an appropriate policy framework needs to be established in the NNCS to guide future negotiations between North Norfolk District Council (NNDC), the infrastructure providers and developers concerning the provision of, and contributions, to required infrastructure. Therefore, no 'in principle' objections have been raised to the soundness of the NNCS in this respect by TCC.
2. However, the Government are seeking to deliver a step change in the supply of housing, and in doing so ensure an appropriate balance of housing supply and demand. It is secured. The importance of the delivery of the housing growth agenda is emphasised in PPS3: Housing (2006), which states (para. 2) that its principle aim is to *"underpin the Government's response to the Barker Review of Housing Supply and the necessary step-change in housing delivery through a new, more responsive approach to land supply at the local level"*, and sets out the (para. 3) Government's commitment to *"improving the affordability and supply of housing in all communities"*. Even more recently the Housing Green Paper (2007) sets out a vision (page 6) where everybody *"has access to a decent home at a price they can afford, in a place where they want to live and work"*, and the Planning White Paper (2007) states (page 12) that *"it is imperative that we support housing growth so that peoples aspirations for good quality, affordable housing can be met"*.
3. Moreover, Policy H1 of the RSS identifies a development requirement of 8,000 new dwellings in North Norfolk in the period to 2021. It highlights that 1,610 dwellings had been constructed in the period to 2006 (320dpa) and, therefore, that there is a residual requirement for the construction of 6,390 dwellings (430dpa). The policy specifically confirms that this is a minimum requirement, and that local planning authorities should seek as soon as possible to exceed the annual average rates and make up any shortfall. Moreover, they should aim to exceed the annual average rates if more housing can be delivered without breaching environmental limits and infrastructure

constraints. The policy imperative to deliver a step change in the supply of housing in accordance with national policy outlined above is very clear.

4. The NNCS generally responds to these national and regional policy imperatives, and the overall scale of housing provision proposed in North Norfolk over the plan period in the NNCS is supported by TCC (albeit there are some detailed concerns regarding the distribution of future development- see representations to the Housing Session).
5. However, a number of the policies in the NNCS which refer to the provision and delivery of infrastructure in the District (Policies SS6 and SS3), and specifically in Fakenham (Policy SS8), seek to limit the grant of planning permission for the required development until appropriate infrastructure has been put in place. Whilst that must be right as a general principle, the concern is that the negative and restrictive wording of the policies could compromise the ability of the NNCS to deliver the housing required to meet identified needs in the District. In doing so it would fail to address the Government's principal policy imperative, and the area's critical issues of accessibility to housing and affordability. Consequently TCC objected to the wording and emphasis of these policies, which are considered to conflict with the intent of both national and regional planning policy.
6. 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 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.
7. It is much too easy to state that housing and employment delivery will be delayed if the infrastructure provision is delayed. Moreover, it is clearly counterproductive for the delivery of the required housing and employment development, that is so vital to the future economic and social well being of the District, to be effectively controlled by the infrastructure providers in this manner.
8. Instead the NNCS should be very clear in respect of the roles and responsibilities of the developers, infrastructure providers, NNDC and Government, and seek to compel them to adopt a pro-active approach to identify the infrastructure requirements, facilitate their provision by establishing a positive way forward, and make the required funding available at the earliest opportunity to deliver the required development.

9. This change in approach and emphasis is particularly important in respect of the planning and delivery of the proposed strategic developments, for example, the land to the north of Fakenham. It will provide the required certainty for developers and infrastructure providers to plan effectively, optimising both private and public investment as it becomes available, and ensure expeditious procurement and implementation. Ultimately it will ensure that the ability to provide 8,000 dwellings and employment development in the District during the plan period is not prejudiced.

Infrastructure Provision in Fakenham

10. The situation in Fakenham is a good illustration of the above point. The new second bullet point of Policy SS8 (as proposed to be modified) simply seeks to restrict development unless there is adequate sewerage capacity. That must of course be right, but whilst sewerage capacity is an important issue, it should not be allowed to dictate when the development urgently required in the town is delivered. The very specific nature of the reference, therefore, is inappropriate and too restrictive for a Core Strategy.
11. The NNCS should instead provide certainty by setting out when the development is required to come forward (and given the national and regional policy agenda that should be as early as possible), and be explicit in stating its expectations of NNDC, infrastructure providers/funders and developers to ensure the delivery of the required supporting infrastructure.
12. It should then be more constructive in terms of how the infrastructure should come forward to serve the development in a planned manner that optimises the potential to secure the necessary investment at the earliest opportunity. That might for example, seek to prioritise any spare existing capacity for the strategic development, bring forward priority investment programmes, examine alternative provision strategies or creative interim solutions, and/or consider the potential for demand reduction.
13. 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 spare capacity for 400-500 new dwellings in the town, which allows the development to begin much earlier than currently indicated in Policy SS8. The policy should, therefore, 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 and community facilities sought.

14. Ultimately, however, a strategic solution is required to accommodate the full extent of the anticipated development in the town. It is understood that 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 (i.e. through identification of the scale, location and timing of development required in Fakenham in an adopted NNCS or at least in a binding Inspector's report), then the infrastructure requirements could be included in that Capital Investment Review (as opposed to the later one currently indicated), and subsequently implemented as early as 2012 (as opposed to 2016).
15. The NNCS, therefore, 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 so vital to the future economic and social well being of the District in accordance with national and regional planning policy.
16. Indeed, TCC have suggested that the allocation on land to the north of Fakenham should be increased to address the potential housing shortfall and distribution issues within the plan period to 2021, and/or phased provision beyond 2021 to ensure a 15 year housing land supply (as highlighted in their Housing Session Written Submission). 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. If the Inspector agrees with this suggestion, the NNCS will need to be revised accordingly, and as suggested above, the expectations in terms of infrastructure provision clearly set out. This would be consistent with the Housing Green Paper that has an overriding policy imperative of housing growth through long term infrastructure planning.

Conclusion and Recommendations

17. The delivery of local and strategic infrastructure is critical to achieving the core aims of the NNCS. However, in light of the current national and regional planning policy context which very clearly focusses on the delivery of housing to meet identified needs, it is not accepted that the policies referred to above should just seek to prevent development until appropriate infrastructure is in place.
18. 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. That should be very clear in respect of the roles and responsibilities of the developers,

infrastructure providers, NNDC and Government, and seek to compel them to adopt a pro-active approach to identifying the infrastructure requirements and facilitating their expeditious provision.