

Topic Paper



Development Strategy

Development Strategy Topic Paper

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1 Purpose

This document has been produced to support a public consultation exercise being undertaken by Opera Community Research on behalf of the Authority and to inform the process of policy formulation. It is not a definitive statement of future policy. It provides a general overview of the issues which the Authority has identified as being important to address in the Local Development Framework. It sets out our evidence and we welcome your comments.

This document is one of five similar documents covering:

- Development Strategy.
- Housing
- Environment
- The Economy
- Transport

The consultation will be undertaken by questionnaire with the objectives of:

- examining the robustness of the evidence base which the Authority has prepared;
- gauging the level of consensus about draft objectives in key policy areas;
- testing the realism and soundness of the options under consideration; and
- gathering feedback on the likely implications of various alternative approaches to assist in the choice of appropriate options.

The five topic papers have been prepared to provide more detailed background information for those interested in exploring the issues in greater depth. This paper provides a summary of the available evidence. It does this by looking at the issues raised in previous consultation exercises, summarising recently commissioned studies and reviewing existing policy. It then identifies what the Authority considers to be the main issues and draft policy aims.

In addition, the Sustainability Appraisal Scoping Report provides a summary of all the issues.

This document is not intended to include all the evidence - most of this is published on the Council's website. Instead, it is intended to encourage debate and discussion. We welcome your comments and there is a response sheet attached in the appendices. Please consider the following questions when forming your response:

- Do you think the correct issues have been identified?
- Are there any significant omissions?
- Do you agree with the aims of policy which are being suggested?

2 Introduction

- 2.1 This is one of five topic papers which have been prepared by North Norfolk District Council (the Council) to inform the production of its Core Strategy Development Plan Document (DPD) – which will be one of the local development documents (LDDs) that make up the new North Norfolk Local Development Framework (LDF). This forms part of the new planning policy system introduced by the Planning and Compulsory Purchase Act 2004. The contents of the LDF will eventually replace all the policies and proposals in the current North Norfolk Local Plan. As with the North Norfolk Local Plan, the LDF will cover the whole of North Norfolk District except that part administered by the Broads Authority for planning purposes.
- 2.2 The purpose of this topic paper is to inform consideration of preferred options for dealing with those issues relating to the preparation of a ‘development strategy’ for North Norfolk which have been identified through the development of an evidence base. This is contained in the Council’s LDF Sustainability Appraisal Scoping Report (Scoping Report). The Scoping Report forms the basis for the LDF Sustainability Appraisal (SA).

LDF Preparation

- 2.3 The Government’s Planning Policy Statement 12: *Local Development Frameworks* (PPS12) sets out the policies that should be taken into account by local planning authorities (LPAs) in the preparation of LDFs. These focus on procedural policy and the process of preparing LDDs.

The Core Strategy DPD

- 2.4 PPS12 makes clear that the purpose of the core strategy is to set out the key elements of the planning framework for the area. It should set out the long-term spatial vision and strategy for the authority’s area and the strategic policies required to deliver them. The purpose of the *development strategy*, which is the subject of this report, is to provide a clear vision for the future pattern of development in the large rural area of North Norfolk by setting out the broad locations for delivering the housing and other strategic development needs, such as employment, retail and community development.

Development of an evidence base

- 2.5 PPS12 requires that the contents of a LPA’s Core Strategy should be founded on a thorough understanding of the needs of its area and the opportunities and constraints which operate within that area. Therefore, the first stage in the Council’s preparation of the Core Strategy has been to gather evidence about its area. This has included:
- preparing up-to-date information on key aspects of the social, economic and environmental characteristics of North Norfolk;
 - commissioning a number of studies by consultants on a variety of topics including a retail and commercial leisure study, an open space and recreation study, a rural economy study and a travel to work analysis;
 - noting the relevant provisions of a large number of national, regional and local strategies affecting North Norfolk District; and
 - seeking the involvement and securing inputs of the community and relevant groups and organisations (stakeholders). In particular, a number of issues were identified as

a result of recent exercises which were undertaken to inform the review of the North Norfolk Local Plan and, more latterly, the preparation of the LDF. These are:

- (i) the Council's preparation of Whole Settlement Strategies for the towns of Cromer, Holt, Fakenham, North Walsham, Sheringham, Stalham and Wells-next-the-Sea. These were prepared in 2001 and 2002 and involved extensive stakeholder participation and public consultation;
- (ii) the Council's two 'Rural Planning Workshops' for representatives of parish councils covering areas outside the seven towns, held in June 2004;
- (iii) the Council's seven LDF Workshops, based on each of the seven towns and their surrounding areas, held in June and July of 2005; and,
- (iv) meetings with a range of special interest groups and statutory agencies covering thematic topics.

(The full contents of the Whole Settlement Strategies, and details relating to the Rural Planning Workshops and LDF Workshops can be viewed on the Council's website www.northnorfolk.org.)

Community strategies

- 2.6 Another consideration in the development of the evidence base has been the statutory requirement for the preparation of the Core Strategy and other LDDs to have regard to the relevant community strategies for an area. PPS 12 states in paragraph 1:10:

'The local development framework should be a key component in the delivery of the community strategy setting out its spatial aspects where appropriate and providing a long-term spatial vision. Local development documents should express those elements of the community strategy that relate to the development and use of land.'

The relevant community strategies for the Council to consider are:

- the community strategy for North Norfolk District (entitled "North Norfolk Community Partnership – Our Community Strategy 2004/2009") published in 2004; and
- the community strategy for Norfolk (entitled "Norfolk Ambition – The community strategy for Norfolk 2003 – 2023"), published in 2003.

- 2.7 In 2005 the North Norfolk Community Partnership carried out a public consultation exercise, undertaken by Opera Community Research, to inform a review of the Community Strategy. The findings from this exercise have been taken into account in preparing this topic paper.

National policies and guidance

- 2.8 The final consideration in the development of its evidence base has been the statutory requirement for the preparation of the Core Strategy and other LDDs to have regard to:
- national policies and advice contained in guidance issued by the Secretary of State (Office of the Deputy Prime Minister); and
 - the Regional Spatial Strategy for the region in which the area of the local planning authority is situated.

- 2.9 Planning Policy Statements (PPSs), Planning Policy Guidance (PPG) notes and Circulars set out the Government's national policies and principles on different aspects of planning. Policies in a particular PPS or PPG are intended to complement, not replace or overrule, other national planning policies and should be read in conjunction with other relevant statements of national planning policy.
- 2.10 There is presently no approved Regional Spatial Strategy for the East of England Region. Instead, for the purposes of informing the current preparation of the Core Strategy DPD, the Council is relying on The East of England Plan. This was published in December 2004, and is formally a draft 'Regional Spatial Strategy' (RSS) which, once finalised, will provide the statutory strategic framework for the preparation of the Council's LDDs.
- 2.11 It should be noted that in response to the statutory consultation exercise on the East of England Plan (which closed on 16th March 2005), this Authority submitted representations to the East of England Regional Assembly (EERA) in respect of certain policies. In particular, it feels that the proposed housing allocation will limit its ability to deliver affordable housing and, consequently, ensure that sufficient workers are available to support the local economy.

Identification of Issues

- 2.12 Clearly, a wide range of issues relating to the development strategy could be of concern to one or more elements of the public at large. However, from the point of view of preparing the Core Strategy DPD, it is necessary to focus on issues which are considered to have 'strategic' significance to the large rural area of North Norfolk District (referred to as North Norfolk).

Summarising the Issues

- 2.13 Following analysis of the evidence base, a number of issues have been identified which the Core Strategy DPD needs to address. These are summarised below under the following headings:
- Community and Stakeholder consultation exercises;
 - Baseline data and forecasts;
 - Relevant Strategies, Studies and Plans; and
 - National and Regional Planning Policy.

3 Issues from Community and Stakeholder Consultation

Whole Settlement Strategies

3.1 The following statements summarise the spatial-strategy related 'objectives' arising out of the preparation of the Whole Settlement Strategies:

3.2 Cromer

- In general, maintain a tight development boundary around the town to protect the countryside from encroachment.
- Provide land in Cromer for new employment development.

3.3 Fakenham

- Carefully plan any expansion on the land situated between the bypass and the town's northern boundary.
- Focus new employment development on the town itself, but accommodate that which could be considered inappropriate to the environment of Fakenham at Tattersett Business Park.

3.4 Holt

- Continue to protect the landscape setting of the town and keep the town compact.
- Identify small-scale extensions to the town for housing and employment – with no detrimental impact on landscape or ecology.

3.5 North Walsham

- Support for limited additional housing provided it can be balanced with increased employment opportunities and improvements in the provision of health, education and other community facilities.
- Only consider significant additional housing in the longer term (i.e. beyond 2011) if improvements to the town's transport infrastructure can be made.

3.6 Sheringham

- Protect the coastline, commons, woodlands, heaths, other important landscape features (such as Franklyn Hill) and wildlife habitats.
- Keep the town contained within its current settlement boundary.

3.7 Stalham

- Identify suitable sites for small-scale housing development close to the town centre.
- Identify a suitable new site in the town (or on the edge) to accommodate small-scale employment enterprises, perhaps in a mixed-use scheme together with housing and/or commercial development.

3.8 Wells-next-the-Sea

- Restrict new housing development to within the existing limits of the town.
- Retain the industrial estate as a site for future industrial development or other employment enterprises.

Rural Planning Workshops

3.9 The following comments typify the issues raised during the Rural Planning Workshops of relevance to the development strategy:

- Affordable housing for local and young people

- Balanced housing mix in the villages
- Review village settlement boundaries
- Small businesses including farming need more encouragement, especially non-tourism (including moderating highway considerations)
- Quality and range of employment
- Impact of ageing population
- Countryside and landscape protection
- Loss of village shops, post offices etc. as a focal point for the community
- Flood risk/coastal erosion: loss of land/property; effects on communities

LDF Workshops

3.10 The following comments typify the town-based 'weaknesses' (w) and 'threats' (t) identified by the SWOT analyses held during the LDF Workshops which are of particular relevance to the development strategy:

3.11 Cromer

- Limited opportunity to expand town (w)
- Poor range of higher order shops (w)
- Type/quality of employment opportunities (t)

3.12 Fakenham:

- Lack of quality food shops and limited retail shopping choices (w)
- Lack of affordable housing to meet local demand (w)
- New development – impact on services and flooding issues (t)

3.13 Holt

- Shortage of housing – lack of social-rented/affordable housing (w)
- Limited employment opportunities, especially full-time industrial (w)
- Suburban sprawl (t)

3.14 North Walsham

- Lack of employment diversity (w)
- Squeeze from housing development without services (t)

3.15 Sheringham

- Lack of job opportunities, especially for young people (w)
- Urban sprawl and over-development of housing (t)

3.16 Stalham

- Lack of local employment and low wages (w)
- Sewerage and infrastructure remains inadequate (t)

3.17 Wells-next-the-Sea

- Opportunities for development have been constrained (w)
- Lack of accommodation for local people that is affordable (w)

3.18 The following comments typify the village-based 'weaknesses' (w) and 'threats' (t) identified by the SWOT analyses held during the LDF Workshops which are of particular relevance to the development strategy:

- Lack of opportunity for work, little employment diversity, low wages (w)
- Lack of village shops and post offices (w)
- Housing stock is too expensive and the ladder is broken across the District (w)

- Population age imbalance skewed to elderly, under-represented by young (w)
- Very poor public transport links across the District creates isolation (w)
- Cliff erosion and tidal flooding threaten landscape and devalue properties (t)
- Stagnation of villages and lack of investment (t)

3.19 The principal findings from the Community and Stakeholder consultation exercises which are considered relevant to the preparation of the development strategy are identified under the following headings:

3.20 Cromer

- The present extent of the town should be maintained in order to protect its landscape setting; the possible exception being for employment purposes.

3.21 Fakenham

- There is support for Fakenham to accommodate further housing (especially affordable housing), retail and employment growth. However, in planning for this growth, consideration needs to be given to flood risk issues in the Wensum valley and the service needs of an increasing population.

3.22 Holt

- There is support for some limited housing (especially affordable housing) and employment growth beyond the town's current boundary.

3.23 North Walsham

- Additional employment opportunities in the town are required.
- There is a view that only limited housing growth is possible in the town without major improvements in the town's community services (e.g. health and education) and road infrastructure

3.24 Sheringham

- The present extent of the town should be maintained in order to protect its landscape setting.
- More local employment opportunities are required.

3.25 Stalham

- More local employment opportunities are required.

3.26 Wells-next-the-Sea

- More local employment and affordable housing opportunities are required.

3.27 The villages

- Additional residential development should focus on meeting the need for affordable housing in order to create a more balanced population.
- More local employment opportunities are required.
- There is support for the protection of the countryside.

4 Issues from Baseline Data and Forecasts

Housing provision

- 4.1 The North Norfolk District Residential Land Availability Statement for the year ending 31 March 2005 is available on the Council's website.
 - 4.2 This reveals that since 1 April 2001 (the commencement date of the emerging Regional Spatial Strategy for the East of England), a net increase of 1,275 dwellings had been built, averaging **319 dwellings** per year.
 - 4.3 Also, as of 31 March 2005, 479 dwellings were under construction and there was extant permission for 1,290 dwellings. Ref. emerging RSS policy on this subject in Section 5.
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5 Issues from Relevant Strategies, Studies and Plans

(NB: copies of all documents to which reference has been made are available for inspection at the Council Offices)

North Norfolk Community Partnership – Our Community Strategy 2004/2009

The current Community Strategy has three main aims:

- Ensuring decent housing for all residents
- Developing the local economy to provide better job, career and training opportunities for local residents and those who want to come and live in North Norfolk
- Maintaining the high quality of life and attractive natural environment that exists now and makes North Norfolk unique

- 5.1 Consideration of the contents of the Community Strategy raises the following issues relating to the development strategy:

- The need to provide more affordable housing for the people of North Norfolk.
- The need to balance development and progress with preservation and conservation.

- 5.2 In August 2005, Opera Community Research held ten group discussions with members of the public as part of a joint exercise to review the community strategy and inform preparation of the Core Strategy. They found that the current priorities remain key areas of concern across all age groups and locations and the implications of high house prices are considered to be increasingly problematic. However, in respect of high house prices, it was also found that many residents 'acknowledge the challenge presented by the problem and struggle to find a solution'. The exercise also noted a need for more diverse employment opportunities.

Norfolk Ambition – The community strategy for Norfolk 2003 – 2023

- 5.3 Consideration of the contents of the County Council's Community Strategy raises the following issues relating to the development strategy:

- 'There is currently much concern about the loss of countryside to development. In 2000-2001, only 37% of housing built in Norfolk was on previously developed (brownfield) land' (ref. page 21).
- It is considered that 'focusing most new housing growth on urban centres will help reduce transport emissions by reducing the need to travel, the length of journeys and by offering a choice of modes of transport. It also offers more opportunities to reuse brownfield sites and reduces pressures on rural areas. There is a clear case for focusing the greatest share of the County's housing requirement,, on the Norwich area. However, market towns are still providing less housing than villages and countryside in the rural areas' (ref. page 26).

Regional Housing Strategy for the East of England: 2005-2010; *East of England Regional Assembly (2005)*

5.4 Consideration of the contents of the Regional Housing Strategy (RHS) raises the following issue:

- LPAs should promote 'the adoption of positive planning policies that improve the supply and quality of affordable housing in sustainable villages and market towns, in response to identified housing and support needs'; and to increase the number of sites on which affordable housing can be sought by reducing thresholds and considering the use of "allocated" exception sites in small settlements in addition to windfall sites' (ref. Figure 11. Policy framework: housing in rural communities).

Sub-Regional Housing Strategy for Rural East Anglia: 2005-2009; Consultation Draft; *Rural East Area Partnership (REAP) comprising the Borough Council of King's Lynn & West Norfolk, Breckland Council & North Norfolk District Council (2004)*

5.5 Consideration of the contents of the Sub-Regional Housing Strategy (SRHS) raises the following issue:

- LPAs should ensure 'that housing policies continue to contribute to the development of sustainable communities' (ref. page 20).

Norfolk Coast Area of Outstanding Natural Beauty: The Housing Market and Affordable Housing – A study of affordable housing in a protected area; *Norfolk Coast Partnership (2005)*

5.6 The following recommendation should be taken into account:

- The adoption of a 'pro-active approach to exception sites which identifies villages where there will be allocated exception sites' (ref. para 44).

Settlement strategy for North Norfolk: Insights from travel to work analysis; *Land Use Consultants (2005)*

5.7 This study presents an analysis of travel to work from, and to, settlements in and adjacent to North Norfolk District using data from the 2001 Census.

5.8 A key element of current Government planning policy guidance is to focus most new development in locations which enable employment, housing, services and other facilities to be provided close together. This should help to ensure that these facilities are served by public transport and provide improved opportunities for access by walking and cycling, and, consequently, reduce the need to travel, especially by car. However, past research

undertaken by Land Use Consultants (LUC) has found that this is not always the case in respect of the relationship between housing and employment, especially in rural areas. The 'travel to work analysis therefore looks at how towns and other large settlements *function* as residential and employment centres, and from this infers which settlements have more or less sustainable travel to work patterns and networks' (para1.3). The results of this exercise can then be combined with other considerations to identify the more sustainable locations for accommodating additional development in the District.

5.9 The following recommendations should be taken into account:

- 'From a travel to work perspective, Fakenham appears to offer the greatest opportunity for sustainable development to build upon its high level of self-containment and role as an employment centre for surrounding settlements. The local network between Cromer, Sheringham and Holt also seems to have potential, but the higher levels of commuting to Norwich from these towns also need to be acknowledged.
- For both Fakenham and the network of Cromer, Sheringham and Holt, new development offers the opportunity to reinforce and extend the existing relative localisation of travel to work. But it could also fuel longer distance commuting. Thus new development needs to be 'purposeful development', with a clear expectation of the spatial outcomes it would produce.
- The high proportion of trips to work made by bike or on foot in the towns is a strength of the district and should be encouraged through the approach of supporting towns with existing high self-containment, as well as through transport policies.
- The sustainability of North Walsham is compromised by the strong links to Norwich, but these should not entirely overshadow its significance as an employment centre for neighbouring local settlements. Thus development here could also assist the sustainability of the town were its clear purpose again to be to reinforce and extend local travel to work, and avoid fuelling commuting. But this will be more challenging than in Fakenham and the network of Cromer, Sheringham and Holt.
- Stalham offers less opportunity to promote sustainability through new development as it is already heavily functionally linked to Norwich and new development will be unable to change this. Development there should be to meet existing local needs only.
- Wells also appears to be functionally weak, but it is a resort settlement and as such this work has been unable to capture the significance of its summer employment role. The same is true of Cromer and Sheringham (although in April their roles were strong in any case) and also Happisburgh and Mundesley. Whereas we cannot conclude that Wells is a location where development can increase sustainability on the basis of our findings, but suggest that further tailored research is needed to better understand how seasonality affects the local economies of towns and villages on the coast, and therefore how they might be planned for to further sustainability in this context.
- The remaining North Norfolk settlements examined in this study – the villages – have an essential strategic function as dormitories. Their employment roles are significantly weaker than those of the towns, and therefore we cannot recommend them as sustainable locations for employment development. Also, most sorts of housing development there would also lead to direct increases in car use for travel to work. Thus for these settlements we recommend only modest development to meet existing local needs (such as for affordable housing).

- Across a wide range of recent work we have come to the firm conclusion that new development can rarely assist the sustainability of smaller rural settlements where their existing functionality is relatively unsustainable. If the people currently living in these settlements are unable to make them sustainable, how would the addition of new people change this? The new people would have to behave quite differently from their neighbours, which is unlikely' (paras 4.13 – 4.20).

North Norfolk District Retail and Commercial Leisure Study 2005; DTZ Piedad Consulting (DTZ)

5.10 The main objectives of the study were to provide:

- an up-to-date assessment of the vitality and viability of the District's main centres;
- detailed centre and household surveys to help identify the catchments and market shares of the District's main centres, as well as people's perceptions of each centre as places to live, work, shop and visit for a variety of activities and uses;
- retail and leisure capacity forecasts for the main centres up to 2016;
- a review of the needs of the District's centres in the context of their identified roles in the retail hierarchy; and
- advice on the strategy for, and potential location of, new retail development in the District, taking account of the Council's objectives to promote sustainability.

5.11 The following key recommendations should be taken into account (see also **Appendix 1** for a summary of recommendations relating to individual centres) :

- DTZ's forecasts indicate 'significant capacity for new comparison goods retailing (in the District) up to 2016' (para 7.11).
- There is 'more limited forecast capacity for new convenience goods retailing in North Norfolk up to 2016' (para 7.17).
- 'DTZ recommend that any major new retail and commercial development should be concentrated in the District's principal centres – namely Fakenham, North Walsham and Cromer. They are the natural foci for locals and visitors to purchase convenience and mainstream comparison goods before visiting other parts of the District. They are also the only centres that have the necessary scale and character of existing facilities and catchment populations to support the forecast capacity for new comparison goods retailing across the District' (para 7.100).
- 'The attraction of multiple/branded retailers and businesses in these principal centres will help to create vitality and a stronger 'year round' economy. A stronger retail, service and leisure offer will also help to make the centres more attractive out of season. This would help some of the District's centres to break out of their current "peak-trough" annual holiday cycle. New development in these centres will also need to comprise larger and more flexible shop units to accommodate the needs of modern retailers for more space' (para 7.101).
- 'Finally, DTZ recommend that the District's smaller centres maintain and enhance their niche and specialist offer. DTZ see little point in trying replicate Norwich's mass market multiple offer, as the District's centres do not have the physical capacity, catchment populations, nor the infrastructure to achieve the necessary

critical mass to be competitive. These centres should build on their niche role and function, and look to satisfy the demands and the needs of their local residents, whilst also marketing their offer to a wider audience' (para 7.103).

The Urban Housing Capacity Study (UHCS) for North Norfolk District; *North Norfolk District Council*

- 5.12 The purpose of the UHCS is to help establish how much additional housing could be accommodated within North Norfolk District's 'urban areas', and, consequently, how much land outside these areas, particularly 'greenfield' land may be required to meet development needs. A draft version of the UHCS was published for consultation purposes in April 2004. The results from this exercise together with the findings of more recent housing land monitoring have informed the final version.
- 5.13 It may be necessary to revise the UHCS once a firm steer has been given by the development strategy in respect of the overarching policy towards housing development in the rural area outside North Norfolk's ten principal settlements (i.e. the seven towns and three Large Villages identified in the current Local Plan which have been the subject of site-specific studies). This is necessary to inform assumptions about the number of dwellings coming forward on 'windfall sites' (i.e. sites which have not been specifically identified as available in the current Local Plan and the future Core Strategy DPD) in this rural area in accordance with policy. Ongoing work in relation to the UHCS that has informed the preparation of this topic paper is set out in **Table 1** (see section 7).

Draft Shoreline Management Plan

- 5.14 The District of North Norfolk possesses 68 kilometres (km) of coastline. Half of this coast is characterised by low lying land that is susceptible to marine flooding and the other half consists of a cliffed coastline which has been actively eroding since the last ice age (~8000 years).
- 5.15 The central 34km of the coastal frontage, from Kelling Hard through to Cart Gap, Happisburgh, is characterised by soft glacial cliffs and sandy beaches. This is in stark contrast to the low lying areas found on either flank. In the west one finds salt-marsh and the famous shingle ridge leading to Blakeney Point spit while, to the east, the beaches and sand-dunes are all that separates the North Sea from the Norfolk Broads. Under natural conditions with an easterly drift, the beaches to the east benefit from the supply of beach material from cliff erosion between Sheringham and Happisburgh.
- 5.16 On North Norfolk's cliffed coastline, the major problem is erosion of the cliffs. The prevention of coastal erosion is termed coast protection and is provided by Maritime District Councils such as North Norfolk District Council. The Council is responsible for both constructing and maintaining the defences on its frontage, in line with Government guidance and through Government funding of capital coast protection schemes.
- 5.17 The settlements of Sheringham, Cromer, Overstrand, Trimmingham, Mundesley, Bacton, Walcott and Happisburgh all sit atop the cliffs, as does the Natural Gas Terminal at Bacton. To avoid the major financial and social implications of these losses, defences have been constructed to limit coastal erosion and protect coastal developments. Shoreline Management Plans (SMP) are documents which set out a strategy for coastal defence planning for a specified length of coast taking account of natural coastal processes and human and other environmental influences and needs. The coast is divided into cells, and the coast of North Norfolk is included in Sub-Cells 3a and 3b. The first SMPs for Sub-Cells 3a and 3b were adopted in 1996 and represent 50-year strategies which include policies for each unit in the sub-cells.
- 5.18 In 2004 a pilot new generation SMP was prepared for the Sub-Cell 3b coast between Sheringham to Lowestoft. In accordance with Treasury (Green Book) guidance the

timeframe of this plan was extended to 100 years. The plan was prepared by consultants Halcrow for a partnership of the Environment Agency, English Nature, the Great Yarmouth Port Authority and the affected local authorities (North Norfolk District Council, Great Yarmouth Borough Council and Waveney District Council). The plan has not yet been adopted by the councils. Consultation on this SMP took place between January and April 2005. The full results of the consultation have yet to be reported to this Council.

- 5.19 The draft SMP is a non-statutory policy document for coastal defence management planning. It states (in section 4.1) that ‘the proposed short-term policies presented in the Draft SMP provide a high degree of compliance with objectives to protect existing communities against flooding and erosion. The preferred long-term Plan promotes greater sustainability of the shoreline and one more in keeping with the natural character of this coast. Continuing to defend the shoreline in a manner similar to today would produce a significant alteration in the nature of the coast, with large concrete seawall structures and few beaches. This might maximise protection to property and land, but would be both difficult and very expensive to sustain. It could also be damaging to the natural environment, and coastal industries, such as tourism, that rely upon the character of the coast to attract visitors.’ Please see the Draft SMP for detailed policies on individual settlements.
- 5.20 In relation to local planning, the SMP notes (section 4.3.1 on page 25): ‘Local planning should consider the risks identified in this Plan and avoid approving development in areas at risk of flooding or erosion. It will also need to take account of the expected losses to the stock of housing, commercial premises and other types of development as a consequence of this Plan, in formulating policies and proposals for new development....To accommodate retreat and loss of property and assets, whether due to coastal erosion or flooding, local operating authorities will need to develop action plans. These will need to address the removal of buildings and other cliff-top facilities well in advance of their loss to erosion. The plans for relocation of people (and communities) also need to be established and clear for all affected.’

North Norfolk Local Plan; *North Norfolk District Council* (adopted by Full Council in April 1998)

- 5.21 The North Norfolk Local Plan (Local Plan) covers the period up to mid-2006. However, under the transition arrangements relating to the introduction of the system of preparing LDFs, the provisions in the Local Plan will remain in force until at least September 2007. After this date, the contents of the Local Plan will gradually be replaced by the policies and proposals in the emerging LDDs. Consideration of the Local Plan in the light of the experience of its implementation raises the following issues:
- Windfall sites: **Table 1**, which details the findings of the emerging UHCS, clearly demonstrates the significant amount of housing that has been generated through developments, mainly small-scale, on windfall sites in the designated Selected Small Villages since 2001. This, as Table 1 shows, is expected to continue in the period up to 2021 because of the high number of new residential sites which have been permitted in recent years.
 - In the designated Countryside area (ref. Policy 5, the extent of which is shown on the Local Plan Proposals Map), a large number of buildings, primarily barns, have been converted to holiday dwellings (i.e. their occupancy is restricted to holiday use only, and permanent residential use is prohibited in accordance with policy) since the Local Plan was adopted. Recent research undertaken by the Council has revealed that, in the period January 1998 to August 2005, planning permission was granted for the conversion of buildings in the Countryside to some **591** holiday units. Of these, some 377 units had been completed or were under construction.

- 5.22 A simple revoking of the holiday occupancy condition in these cases as a result of a revision to, or replacement of, Local Plan Policy 29: The Reuse and Adaptation of Buildings in the Countryside (which prevents permanent residential use of such buildings unless they are situated adjacent to the designated boundary of a town, Large Village or Selected Small Village) would create instant dwellings which would count against the dwelling requirement in the RSS. Furthermore, it is recognised that a significant number of other barns and buildings in the Countryside exist which could prove attractive for conversion to permanent residential use in a more favourable policy climate.
- 5.23 Over the years, concerns have been expressed, particularly by Members, as to whether holiday use represents the most effective use of these buildings. It has also been requested that the restrictive approach to permanent residential use in Local Plan Policy 29 should be reviewed.
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6 Issues from National and Regional Planning Policy

The Government's Objectives for the Planning System

- 6.1 **The Government's Planning Policy Statement on Delivering Sustainable Development (PPS1)** sets out its objectives for the planning system. In short, these make clear that the concept of *sustainable development* is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. PPS1 refers to the Government's 1999 strategy (*A Better Quality of Life – A Strategy for Sustainable Development for the UK*) which sets out the following four aims for sustainable development. These are:
- social progress which recognises the needs of everyone;
 - effective protection of the environment;
 - the prudent use of natural resources; and
 - the maintenance of high and stable levels of economic growth and employment.
- 6.2 Recent Government policy announcements have been influenced by its 2003 action programme entitled *Sustainable communities: building for the future*. This document promotes the concept of 'sustainable communities'. Page 5 of the document asks the question : "Why, sustainable communities?" The Government explains:

'Housing and the local environment are vitally important. But communities are more than just housing. They have many requirements. Investing in housing alone, paying no attention to the other needs of communities, risks wasting money – as past experience has shown.

A wider vision of strong and sustainable communities is needed to underpin this plan, flowing from the Government's strong commitment to sustainable development. The way our communities develop, economically, socially and environmentally, must respect the needs of future generations as well as succeeding now. This is the key to lasting, rather than temporary, solutions; to creating communities that can stand on their own feet and

adapt to the changing demands of modern life. Places where people want to live and will continue to want to live.'

The Government's (Office of the Deputy Prime Minister [ODPM]) Circular 05/2005: Planning Obligations

- 6.3 This Circular provides revised guidance to local authorities on the use of planning obligations under Section 106 of the Town and Country Planning Act 1990, as substituted by the Planning and Compensation Act 1991. It therefore replaces Department of the Environment Circular 1/97.
- 6.4 Planning obligations are typically agreements between local planning authorities and developers negotiated in the context of granting a planning permission. They provide a means of ensuring that developers contribute towards the infrastructure and services that LPAs believe to be necessary to facilitate proposed developments. Contributions (which are sometimes described as 'planning gain') may either be in cash or in kind. Planning obligations are also used to deliver affordable housing. Policy regarding their use should be set out in a LPA's development plan.
- 6.5 The Circular sets out some of the reforms to the planning obligations system proposed in the consultation paper *Contributing to sustainable communities: a new approach to planning obligations*, published in November 2003. The changes in this Circular concern only the negotiation of planning obligations and do not introduce an **optional planning charge** as proposed in the Government's 2003 consultation paper. A decision on the introduction of an optional planning charge will be made in the context of the Government's response to the Barker Review of Housing Supply entitled *Delivering stability: Securing our future housing needs* (March 2004). The Review recommended the introduction of a **planning-gain supplement** accompanied by a 'scaled-back' system of planning obligations – both of which would require legislation. This Circular therefore concerns the improvements to the current system which the Government would like to make in the interim period before further reforms are brought forward.

The Government's (Department of the Environment, Transport and the Regions) Rural White Paper entitled 'Our Countryside: the future – A fair deal for rural England' (2000)

- 6.6 Of particular significance to the preparation of the development strategy is the Government's statement in para 9.2.4 of the Rural White Paper. This states:
- 6.7 'We are modernising our planning system so that it strikes a balance between protecting our countryside, providing for economic prosperity and promoting social inclusion:
- **Housing:** Our new planning guidance gives priority to the development of sustainable brownfield sites before building on greenfields. We have set a national target that, by 2008, 60% of additional housing should be built on previously developed land or reuse existing buildings. That will help prevent the unnecessary loss of countryside to development.
 - We are encouraging **rural housing to be increasingly concentrated round market towns**, but with some small developments in villages where there is a particular need for affordable dwellings (see chapter 5).
 - **Town Centres:** We have strengthened our planning guidance to protect town centres from out of town retail and leisure development. We want to put the heart back into our market towns.

- **Countryside:** We will continue with our policy of safeguarding the open countryside against inappropriate development, protecting our best landscapes and conserving our wildlife.
- **Redundant farm buildings:** farm diversification projects can often make use of existing buildings. We are in favour of ensuring that good quality existing buildings are reused to provide jobs in the countryside and we are going to make this clear in planning guidance. Not all farms buildings are suitable for reuse – some, for instance, are unsightly and were never designed to be permanent – and we will have safeguards to ensure that a proper balance is struck between helping the rural economy and protecting the environment.
- **Planning for transport:** we will be issuing new planning guidance which implements our policy of strengthening market towns by making them the focus for development of new jobs, housing and services. Our new guidance will make it clear that new employment opportunities – such as jobs in redundant farm buildings – should not be ruled out simply because they are in less accessible locations , especially where they can be reached by walking, cycling or public transport.'

National planning policy context for preparing a development strategy

- 6.8 **The Government's Planning Policy Guidance note on Housing (PPG3), as amended, coupled with Government Circular 06/98: *Planning and Affordable Housing***, provides the current overarching policy context for planning for housing. This is addressed in the Housing Topic Paper.
- 6.9 **The Government's Planning Policy Guidance note on Industrial and Commercial Development and Small Firms (PPG4)** was published in 1992. Although somewhat dated, it continues to provide the current policy context for a range of issues relating to industrial and commercial development and small firms. However, it does not cover issues relating to planning for town centres and the main uses that relate to them, notably retailing; nor does it cover tourist related development.
- 6.10 Consideration of the contents of PPG4 insofar as it relates to the development strategy requires the DPD to:
- 'encourage new development in locations which minimise the length and number of trips, especially by motor vehicles;
 - encourage new development in locations that can be served by more energy efficient modes of transport (this is particularly important in the case of offices, light industrial development, and campus style developments such as science and business parks likely to have large numbers of employees);
 - discourage new development where it would be likely to add unacceptably to congestion;
 - locate development requiring access mainly to local roads away from trunk roads, to avoid unnecessary congestion on roads designed for longer distance movement' (para 10).
- 6.11 **The Government's Planning Policy Guidance note on Planning for Town Centres (PPS6)** covers city, town, district and local centres (as defined in Table 1 of Annex A of PPS6) and the main town centre uses (as set out in para 1.8 of PPS6). Consideration of the contents of PPS6 insofar as it relates to the development strategy raises the following issues:

- In order to deliver the Government's objective of promoting vital and viable town and other centres, development should be focused in existing centres in order to strengthen and, where appropriate, regenerate them.
- LPAs should actively plan for growth and manage change in centres over the period of their DPDs by:
 - selecting appropriate existing centres to accommodate the identified need for growth; and
 - managing the role and function of existing centres by, for example, promoting and developing a specialist or new role and encouraging specific types of uses in some centres.

6.12 **The Government's Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7)** provides the current policy context for planning for England's rural areas, including country towns and villages and the wider, largely undeveloped countryside up to the fringes of larger urban areas. It therefore applies to the whole of North Norfolk District.

6.13 Consideration of the contents of PPS7 insofar as it relates to the development strategy raises the following issues:

- The Government makes clear that LPAs 'should facilitate and promote sustainable patterns of development and sustainable communities in rural areas. This should include policies to sustain, enhance and, where appropriate, revitalise country towns and villages (including through the provision of affordable housing) and for strong, diverse economic activity, whilst maintaining local character and a high quality environment' (para 2).
- In respect of the location of development, LPAs 'should focus most new development in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access by walking and cycling. These centres (which might be a country town, a single large village or a group of villages) should be identified in the development plan as the preferred location for such development' (para 3).
- Allowance should be made for 'some limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities' (para 4).
- In the largely undeveloped countryside that separates the towns and villages, except where it is allocated for development in development plans, new building development should be strictly controlled. 'Planning policies should provide a positive framework for facilitating sustainable development that supports traditional land-based activities and makes the most of new leisure and recreational opportunities that require a countryside location. Planning authorities should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced' and 'have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities' (para 15).
- There is support for the reuse of appropriately located and suitably constructed existing buildings in the countryside where this would meet sustainable development

objectives. 'Re-use for economic development purposes will usually be preferable, but residential conversions may be more appropriate in some locations, and for some types of building' (para 17). LPAs are required to be particularly supportive of the reuse of existing buildings that are 'adjacent or closely related to country towns and villages, for economic or community uses, or to provide housing in accordance with the policies in PPG3' (para 18).

6.14 **The Government's Planning Policy Guidance note on Transport (PPG13)** sets out how it intends 'to integrate planning and transport at the national, regional, strategic and local level to:

- promote more sustainable transport choices for both people and for moving freight;
- promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling; and
- reduce the need to travel, especially by car' (ref. para 4).

6.15 Consideration of the contents of PPG13 insofar as it relates to the development strategy raises the following issues:

- In rural areas, LPAs should locate most development for housing, jobs, shopping, leisure and services 'in local service centres which are designated in the development plan to act as focal points for housing, transport and other services, and encourage better transport provision in the countryside (ref. para 6).
- 'In order to reduce the need for long-distance out-commuting to jobs in urban areas, it is important to promote adequate employment opportunities in rural areas. Diversification of agricultural businesses is increasingly likely to lead to proposals for conversion or re-use of existing farm buildings for other business purposes, possibly in remote locations.' 'local authorities should encourage farm diversification proposals particularly, but not exclusively, where this enables access by public transport, walking and cycling. They should be realistic about the availability, or likely availability, of alternatives to access by car. Similarly, they should not reject proposals where small-scale business development or its expansion would give rise to only modest additional daily vehicle movements, in comparison to other uses that are permitted on the site, and the impact on minor roads would not be significant' (para 43).

6.16 **The Government's Planning Policy Guidance note on Coastal Planning (PPG20)** sets out planning policy for the coastal areas of England. Consideration of the contents of PPG20 insofar as it relates to the development strategy raises the following issue:

- In areas at risk from flooding, erosion by the sea, land slips and falls of rock, the policy is to avoid putting further development at risk. In particular, 'new development should not generally be permitted in areas which would need expensive engineering works, either to protect developments on land subject to erosion by the sea or to defend land which might be inundated by the sea' (ref. para 2.13).

6.17 **The Government's Planning Policy Guidance note on Development and Flood Risk (PPG25)** sets out how flood risk should be considered at all stages of the planning and development process in order to reduce future damage to property and loss of life. Consideration of the contents of PPG25 insofar as it relates to the development strategy raises the following issue:

- LPAs are expected to apply a risk-based approach to the preparation of LDDs through a 'sequential test'. Accordingly, in preparing policies, LPAs should give priority in allocating land for development in descending order to the flood zones set out in Table 1 of PPG25.

The Regional Spatial Strategy (RSS) for the East of England

6.18 The principal draft RSS policies relating to the development strategy are:

- Policy SS4 : use of previously developed land and buildings;
- Policy SS5: town centres;
- Policy SS9: development in rural areas;
- Policy SS14: development and flood risk;
- Policy SS15: the coast;
- Policy NSR4: housing; and
- Policy H1: distribution of dwelling provision 2001 – 2021.

6.19 The full contents of these policies can be accessed via the Council's website. Policies H1 and SS15 were the subject of representations by the Council. Copies of these representations are available on request.

6.20 In addition, the draft RSS identifies a number of current Norfolk Structure Plan policies or parts of policies which will be 'saved' (under the transitional provisions of the Planning and Compulsory Purchase Act 2004) and remain valid until at least 28 September 2007 (see Appendix E of draft RSS). The full contents of these policies can be accessed via the Council's website.

6.21 The policies which are relevant to the preparation of the development strategy, and the reasons for saving them, are set out below:

- Policy CS.3 (Locational Strategy) - 'Although locational strategy replaced by SS9, save LDD level guidance on locations for housing growth. Note that the reference to 'rural centres' is not consistent with terminology in SS9.'
- Policy CS.4 (Locational Strategy) - 'Save LDD level guidance on locations that function as rural market towns not otherwise covered by sub-regional policies.'
- Policy H.8 (Housing in the Countryside) - 'Save LDD level guidance on housing in the countryside.'
- Policy EC.2 (Main Settlements) - 'Save LDD level guidance on locations for employment growth not covered by sub-regional policies.'
- Policy EC.6 (Rural Areas) - 'Save LDD level guidance on re-use of buildings in the countryside for employment.'
- Policy ENV.11 (The Coast) – 'Save LDD level guidance on resisting land reclamation along the Wash Coast, erosion and development to the seaward side of flood defences.'

6.22 Consideration of the contents of the emerging RSS policies relating to the development strategy and the relevant saved policies from the Norfolk Structure Plan raises the following issues:

- To ensure that at least 60% of all new development in the region will take place in or using previously-developed land or buildings (ref. Policy SS4).
- To ensure that town centres are the focus for investment, environmental enhancement and regeneration (ref. Policy SS5).
- To focus development in rural areas on market towns and thereafter in key service centres (ref. Policies SS9 and SS15).
- In all other rural settlements and related communities, to assist the continued viability of agriculture and other rural economic activities, such as tourism, the diversification of the rural economy and the provision of housing for local needs, and support the sustainability of local services (ref. Policy SS9).
- Where possible, to locate new development in locations with little or no risk of flooding (ref. SS14).
- To ensure that the location of new development is compatible with shoreline management plans so as to avoid constraining effective future flood management or increasing the need for expensive new sea defences (ref. SS15).
- To provide for a net increase of 6,400 dwellings in North Norfolk District between 2001 and 2021 (ref. Policy H1).
- To provide for a minimum of 1,000 dwellings in that part of North Norfolk lying within the Norwich sub-region.
- The principal locations for development will be Fakenham and North Walsham (ref. CS.3).
- In Cromer, Holt, Sheringham, Stalham and Wells-next-the-Sea, the emphasis should be on enhancing the service and employment roles of these towns. Provision for housing should only be made where it improves the balance with jobs and services locally (ref. CS.4).
- Employment growth is encouraged in all seven of North Norfolk's towns to improve the balance between people and jobs in the towns and their rural catchments, and to discourage long-distance commuting (ref. EC.2).
- In the countryside outside villages, economic development should generally be restricted to proposals involving the reuse of suitable buildings and/or where there are particular reasons for the development not being located on established or allocated sites. This would include the possibility of appropriate reuse and/or redevelopment of the technical areas associated with Coltishall Airbase and the former Sculthorpe and West Raynham Airbases. (ref. EC.6).

6.23 In its representation to EERA on Policy H1, the Council objected to the 6,400 figure on the basis that such a low figure would limit its ability to secure additional affordable housing on eligible sites. Instead, the Council is seeking a higher figure of **8,000 dwellings with a view to securing a higher number of affordable dwellings.**

- 6.24 In its representation to EERA on Policy SS15, the Council sought amendments to the sixth bullet point so as to read: **'ensure that the location of new development is compatible with agreed shoreline management plans'**.
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7 Discussion of Issues, Related Aims & Options and Options Appraisal

- 7.1 Insofar as it relates to rural areas, Government and emerging regional planning policy is clear in seeking to accommodate the majority of new development in or near to local service centres where employment, housing, services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access by walking and cycling, thus helping to facilitate sustainable patterns of development and promote sustainable communities. In terms of the RSS, local service centres are viewed as being the market towns and large villages with a good level of services. In all other rural settlements and related communities, LPAs should consider what limited development is necessary to meet local business and community needs and to maintain the vitality of these communities. In view of this policy steer, the Council's primary aim in respect of informing the preparation of the development strategy is:
- 7.2 ***AIM 1: To locate development where it will provide the opportunity for people to satisfy their day-to-day needs for employment, shopping, education and other services locally or in locations which minimise the need to travel and where there are modes of transport available in addition to the motor car.***
- 7.3 Government and emerging regional planning policy on rural areas also emphasise the importance of protecting the open countryside for the benefit of all, and that the highest level of protection should be afforded to our most valued landscapes and environmental resources. One possible exception to this approach, however, may relate to the need to encourage appropriate renewable energy developments in order to help in the reduction of 'greenhouse gas' emissions. The findings of the Environment Topic Paper address these concerns in detail. Consequently, in formulating an appropriate development strategy for North Norfolk, account should also be taken of the following aim:
- 7.4 ***AIM 2: To protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscape, heritage and wildlife, the wealth of its natural resources and so it may be enjoyed by all.***

Presentation of Alternative Options

- 7.5 In order to inform the identification of alternative options for addressing these aims, the following key points emanating from the earlier exploration of issues relating to the development strategy and the other topic papers, especially the Housing paper, should be borne in mind:
- 7.6 **Cromer:**
- Considered suitable for employment and service growth in the saved Structure Plan.
 - The town's proportion of self-containment is 53.5%.
 - It is a slight net importer of employees.
 - It has a significant flow of residents travelling to work in Norwich, but a negligible number are using the train service.

- It is considered suitable for accommodating retail growth by the Retail Study.
- There is community resistance to expansion of the town into the surrounding countryside, much of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty, with possible exception for employment-generating purposes.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 400 dwellings.

7.7 **Fakenham:**

- Identified for growth in the saved Structure Plan.
- At 61.7%, the town has the highest proportion of self-containment (i.e. the percentage of travel to work trips from the settlement that are contained within the settlement) of all the District's towns.
- It is a significant net importer of employees from surrounding towns and villages.
- It is considered suitable for retail growth by the Retail Study.
- There is community support for employment and residential growth, including a northern extension of the town.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 260 dwellings.

7.8 **Holt**

- Considered suitable for employment and service growth in the saved Structure Plan.
- The town's proportion of self-containment is 55.5%.
- It is a significant net importer of employees from surrounding towns and villages (second only to Fakenham).
- It participates in a clear 'network' of commuting between Cromer, Holt and Sheringham.
- The Retail Study recommends protection of its niche centre status and qualitative improvements to the evening economy.
- There is community support for some small extensions to the town to facilitate employment and residential growth.
- The northern extremities of the town are situated in the Norfolk Coast Area of Outstanding Natural Beauty.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 90 dwellings.

7.9 **North Walsham:**

- Identified for growth in the saved Structure Plan.
- The town's proportion of self-containment is 50.5%.
- It is a net exporter of employees.
- It has a strong flow of residents travelling to work in Norwich (31.6% of out-commuting trips), the great majority of which travel by car in spite of the train service.
- It is considered suitable for accommodating retail growth by the Retail Study.
- There is community support for further employment growth, but there are concerns about residential growth that is not supported by improvements in community facilities and local road infrastructure.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 400 dwellings.

7.10 **Sheringham**

- Considered suitable for employment and service growth in the saved Structure Plan.

- The town's proportion of self-containment is 51.9%.
- It is a significant net exporter of employees.
- Approximately half of out-commuting is to Holt, Cromer and Norwich.
- The Retail Study has identified a qualitative need for a town centre supermarket and the need for qualitative improvements to the 'evening economy'.
- There is community resistance to expansion of the town into the surrounding countryside, much of which is designated as the Norfolk Coast Area of Outstanding Natural Beauty.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 220 dwellings.

7.11 Stalham

- Considered suitable for employment and service growth in the saved Structure Plan.
- The town's proportion of self-containment is 35.8%.
- It is a significant net exporter of employees, with almost 30% of out-commuting trips destined for Norwich.
- The Retail Study recommends promoting the role of the centre through increasing provision in the food and drink sector and by marketing its proximity to the tourist attractions of the Broads.
- There is community support for some small-scale residential and employment developments close to the town centre
- Parts of the town and its setting are at risk from flooding.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 100 dwellings.

7.12 Wells-next-the-Sea:

- Considered suitable for employment and service growth in the saved Structure Plan.
- The town's proportion of self-containment is 55.5%.
- It is a net exporter of employees, with 21.3% of out-commuting trips destined for Fakenham.
- The Retail Study recommends that the town needs to build upon its status as a tourist destination but in a way which complements rather than competes with the seaside attractions on offer in Cromer and Sheringham. Again, there is scope for improving the food and drink sector.
- There is community support for some small-scale residential developments, especially for affordable housing, within the town.
- The whole of the town is situated in the Norfolk Coast Area of Outstanding Natural Beauty.
- Parts of the town and its setting are at risk from flooding.
- Estimated UHCS housing capacity based on current Local Plan boundary is approx. 80 dwellings.

7.13 Conclusions on key points relating to the towns

Town	Summary of points	Conclusions
Cromer	<ul style="list-style-type: none"> • Traditional holiday resort, net importer of employees • Higher level service centre, considered suitable for retail growth • Environmental constraints are recognised by the community 	Environmental constraints to greenfield expansion of town, but opportunities for brownfield housing and employment
Fakenham	<ul style="list-style-type: none"> • Self-contained market town, significant 	Large-scale

	<p>levels of employment, largest net importer of employees</p> <ul style="list-style-type: none"> • Higher level service centre, considered suitable for retail growth • Community support for employment and residential growth 	<p>employment and residential growth appropriate</p>
Holt	<ul style="list-style-type: none"> • Niche high-quality shopping destination • Significant levels of employment, net importer of jobs, clear network with Cromer and Sheringham • Community support for small extensions to town for employment and housing 	<p>Could act as limited employment and housing 'growth centre' for Cromer/Sheringham/Holt cluster.</p>
North Walsham	<ul style="list-style-type: none"> • Largest town in District, potential to build on links to Norwich, but mainly car trips • Net exporter of employees • Higher level service centre, considered suitable for retail growth • Community support for employment growth, reservations about housing growth not supported by infrastructure. 	<p>Employment growth and some residential growth appropriate, but large-scale housing growth not appropriate unless infrastructure issues resolved</p>
Sheringham	<ul style="list-style-type: none"> • Traditional holiday resort, net exporter of jobs (mainly to Cromer, Holt and Norwich) • Community resistance to greenfield development. 	<p>Significant housing growth inappropriate</p>
Stalham	<ul style="list-style-type: none"> • Limited employment, net exporter of jobs, mainly to Norwich • Community support for small-scale residential and employment development for regeneration purposes 	<p>Small-scale development appropriate to achieve regeneration objectives</p>
Wells-next-the-Sea	<ul style="list-style-type: none"> • Traditional holiday resort, net exporter of employees • High level of second/holiday homes, high house prices • Environmental constraints (AONB and flood risk) • Community support for residential development, particularly to achieve additional of affordable housing 	<p>Small-scale residential development appropriate to achieve affordable housing objectives</p>

7.14 The villages and surrounding countryside

- There is strong community support for the provision of more affordable housing in the villages in order to support a wider range of households and create a more balanced population.
- There is strong community support for the protection of village character and the countryside.
- There is strong community support for fostering small businesses in rural communities, including farm diversification proposals.
- Estimated UHCS housing capacity based on current Local Plan boundaries is approx. 1460 dwellings for the seventy-seven Selected Small Villages and 280

dwelling for the three Large Villages of Briston/Melton Constable, Hoveton and Mundesley.

- The conclusions of the consultants undertaking the travel to work analysis are that North Norfolk's villages perform an essential strategic function as dormitories. Their employment roles are significantly weaker than those of the towns, and therefore they are not viewed as sustainable locations for significant employment development. It is also considered that most types of additional housing development in the villages would lead to direct increases in car use for travel to work. Thus for these settlements they recommend only modest development to meet existing local needs (such as for affordable housing).
- A number of coastal villages are at risk from either tidal flooding or coastal erosion.

Affordable Housing

7.15 As is recognised in the Housing Topic Paper, in order to maximise the potential for securing affordable housing on market sites, the Council must:

- lower the site-size threshold of housing proposals above which affordable housing is to be sought; and
- increase the proportion/percentage of affordable housing to be sought in eligible proposals.

7.16 In terms of informing the development strategy, the most important consideration is the identification of the site-size threshold. Consideration of the site-size threshold issue in the Housing Topic Paper suggests that a site-size threshold of 2 or more dwellings is probably the optimum threshold in terms of maximising the opportunities for seeking affordable housing contributions – provided that the opportunities for permitting proposals for single dwellings can be significantly reduced. The reduction in housing provision achieved through single-dwelling sites could then be converted into larger housing allocations which would generate affordable housing contributions.

7.17 If opportunities for scaling down the total number of dwellings coming forward on single sites are to be sought, then, in terms of Government and emerging regional planning policy, the most sustainable option would be to reduce the capacity for such sites existing in the villages and the wider countryside. An even more effective alternative would be to restrict the opportunity for any further windfall housing developments in those settlements currently designated as Selected Small Villages in the Local Plan and in other locations designated as Countryside in the Local Plan. Instead, focus would be placed on allocating land for some 'medium-sized' housing developments (approx. 15 - 30 dwellings) in a small number of villages considered to perform a role, albeit limited, as service centres for a wider rural area. These allocations could be for mixed market and affordable housing development, solely affordable housing development under the 'rural exception site' policy or a combination of both.

7.18 This latter course of action would mean that small-scale developments would be limited to the seven towns and three Large Villages currently identified in the Local Plan. The other significant implication of this approach would be to prevent the reuse of existing buildings for residential purposes in the areas outside these ten settlements.

7.19 Employment

The findings of the Employment Topic Paper indicate that the overall approach to employment development in the current Local Plan should be followed through in the emerging Core Strategy DPD. The current Local Plan seeks to focus employment development in North Norfolk's towns and allocates greenfield land for employment development in both Fakenham and North Walsham. It also seeks to protect established

employment land in a number of villages in order to support the wider rural economy, as well as promoting farm diversification given the increasing challenges facing the agriculture industry.

7.20 **Reuse of buildings in the countryside**

The discussion above touches upon the issue of whether or not encouragement should be given to the conversion of buildings which are not situated within designated boundaries to permanent residential use. If there were to be a restriction on the opportunities for promoting small-scale residential developments outside the seven towns and three Large Villages, for reasons of maximising affordable housing and sustainability, it could be argued that the same reasons would support a policy restricting the reuse of buildings outside these settlements as permanent dwellings, notwithstanding the fact that the buildings already exist.

7.21 The reuse of buildings in the Countryside has been a significant issue in the consultation exercises and in recent press coverage. The Adopted Local Plan (Policy 29) allows conversion to residential use if the building is adjacent to a settlement boundary, on the basis that development in these locations is consistent with the overall development strategy. New residential use is not generally considered appropriate in the Countryside as new dwellings are required to be in locations adjacent to local services, thereby reducing reliance on the car for all journeys. It is also considered that the conversion to residential use as compared with holiday accommodation is likely to entail additional landscape impact through provision of gardens, garages and other outhouses which could have an “urbanising” impact on the landscape.

7.22 The policy justification is based on the view that conversion to employment or holiday accommodation is more beneficial to the local economy. The use of the redundant buildings for these purposes is regarded as a means of supplementing farm incomes and providing some local employment.

7.23 A range of views have been expressed on the issue including:

- There is an over-supply of holiday accommodation
- Employments proposals are not financially viable
- The only viable use is for residential conversion and this cash injection would help support farm diversification projects
- There is a desire to provide more affordable housing in rural areas, and barns could help achieve this by conversion into smaller units
- There is a desire to provide on-site accommodation for farm workers and family members
- Frustration that holiday occupancy conditions are being flouted and are not enforceable
- Frustration that properties are marketed as all-year occupancy
- It is a waste of resource not to reuse existing buildings
- Many farm buildings in the countryside are not in “sustainable” locations and make occupants car-dependent
- Barn conversions are usually high value properties (owing to the conversion costs) and therefore do not address the needs of local people for affordable housing
- The trend for internet-based home working means that many more people are able to work from remote locations
- There are inconsistencies between neighbouring planning authorities

7.24 The issue has implications for a range of policy areas such as:

- Holiday accommodation conditions (covered in the Economy Topic Paper)
- Farm diversification (covered in the Economy Topic Paper)

- Landscape protection and the use of historic buildings (covered in the Environment Topic Paper)
- The development strategy and housing policies - the impact of such a policy on the number of dwellings to be provided in the District

7.25 The main issue in relation to the development strategy therefore concerns the implications of any relaxation of policy 29 on the housing allocations and this is considered in relation to the housing scenarios covered later in this topic paper. It is difficult to estimate how many dwellings might come forward if a policy to allow straight conversion to residential use were to be brought forward. As well as creating pressure to remove existing conditions on property, demand could be generated for a large number of high value conversions in inaccessible locations. This would be contrary to Government policy which seeks to locate new development in locations providing a range of local services and jobs and therefore reducing the need for car travel. Moreover, the recent PPS7 (Autumn 2004) supports a criteria-based approach where the reuse for economic development purposes will usually be preferable to residential use and that only buildings worthy of retention should be appropriate for conversion. Views on this issue will be collected during the options consultation exercise, so that a policy approach can be brought forward as part of the overall development strategy.

7.26 Location of housing

For the purpose of this consideration, the Council has assumed that it will be required to provide 6,400 dwellings in the period 2001-2021, notwithstanding the Council's current objection to the draft RSS seeking a figure of 8,000 dwellings.

7.27 As can be seen from **Table 1** below, a significant proportion of this requirement (over 1,000 dwellings) had been built as of 31 March 2005. In addition, some 480 dwellings were under construction and there was planning permission for 1,200 dwellings where development had not yet commenced (**NB:** The real figure for permissions is 1,290 dwellings; however it has been discounted by 7% to take into account the likelihood of a proportion of the permissions expiring [lapsing] through not being implemented in time. Discounting is common practice in studies of housing land availability, and the 7% figure is based on a recent study of lapsed residential planning permissions in North Norfolk.)

7.28 Table 1 also shows findings from ongoing work on the Council's UHCS which indicates that in eight of the ten principal settlements in North Norfolk (i.e. within the seven towns and three Large Villages designated in the current Local Plan) there are sites with potential for residential development of **5 or more dwellings** amounting to 830 dwellings (**NB:** By 'potential' it is meant that such sites could be developed either in accordance with current Local Plan policies or through revision to certain current policies via the preparation of the DPDs.) The table also contains informed estimates of future residential planning permissions being granted on windfall sites of **4 or less dwellings** in the ten principal settlements, and on windfall sites of **all sizes** in the seventy-seven Selected Small Villages (designated in the Local Plan) during the sixteen-year period from 1 April 2005 to 31 March 2021. Such proposals, again with a discount of 7%, amount to just under 2,500 dwellings.

7.29 The total effect of these considerations is that if the current approach to locating residential development set out in the current Local Plan were to be carried through to the new Core Strategy DPD, then it is estimated that there would only be scope for identifying new sites for residential development for some **159 dwellings** (assuming all sites identified in the final UHCS are allocated for development).

TABLE 1: HOUSING LAND SUPPLY AND CAPACITY OF SETTLEMENTS (number of dwellings)

Town/ area	Completions (01 – 05)	Under Construction (Mar '05)	Extant Planning Permissions (Mar '05) [5]	UHCS Site capacity (March '05) [1 & 6]	Predicted Windfall Capacity (05 -21) [2 & 5]	TOTAL
Cromer	127	65	190	191	213	786
Fakenham	135	29	117	121	142	544
Holt	98	48	73	0	86	305
North Walsham	103	30	139	263	138	672
Sheringham	160	35	60	94	124	473
Stalham	28	15	47	62	34	187
Wells	38	6	19	36	48	147
Towns Sub-total	689	228	645	767	785	3114
Briston/M. Constable	69	33	144	47	69	362
Hoveton	12	19	14	0	20	65
Mundesley	26	18	32	16	124	215
All other parishes	479	181	365			1025
Selected Small Villages (5+ dwellings) [1]					376	376
Selected Small Villages (2-4 dwellings) [3]					501	501
Selected Small Villages (1 dwelling) [4]					582	582
Villages Sub-total	586	251	554	63	1672	3126
TOTAL	1275	479	1200	830	2457	6241
Regional Spatial Strategy Allocation Under Provision						6400 <hr/> 159 <hr/>

Notes

1 This is based on sites with an expected capacity of five or more dwellings

2 This is based on sites of four dwellings or less

3 This is based on sites of two to four dwellings

4 This is based on sites of one dwelling

5 Lapse rate of 7 % applied, based on analysis of lapsed planning permissions between 1998-2005

6 UHCS analysis of sites (March 05)

Conclusions

7.30 Following consideration of the points raised above, it has been concluded that the fundamental factor influencing the nature of the development strategy is the future distribution of the dwelling provision which the RSS requires the Council to make. Housing development in North Norfolk, for which there is a recognised current and future demand, rather than employment and other types of development will be the primary means of helping to achieve AIM 1 and, currently at least, represents the greatest threat to the achievement of AIM 2.

7.31 It is decisions on the location of future housing, therefore, which are to form the basis for the consideration of options for a development strategy in this topic paper. In the light of the significant role which the location of housing will play in the formulation of the development strategy, it has been decided not to progress to the consideration of options at this stage. Instead, three **scenarios** for a 'housing-led' development strategy are proposed for consideration below. They are for illustrative purposes only, and none of

them should be regarded as a potential preferred option. They simply seek to inform further stakeholder consideration of some of the consequences of seeking to meet the current draft RSS requirement for a net increase of 6,400 dwellings in the period 2001-2021 given the housing activity which has taken place in North Norfolk since the adoption of the Local Plan. The basis for their formulation is to explore the consequences of promoting:

- firstly, a continuation of the current Local Plan 'development strategy';
- secondly, intensifying the strategy of focussing development in the two Local Plan 'Growth Towns' of Fakenham and North Walsham; and
- finally, focussing on the identified issues and needs relating to the seven towns and the villages in general set out in paras 7.6-7.12 above.

Their formulation has also had regard to:

- the view that it is 'unsustainable' to accommodate significant numbers of additional dwellings in villages and the undeveloped countryside other than to meet the local need for affordable housing;
- the need to maximise the provision of affordable housing on market sites through, amongst other initiatives, minimising the number of dwellings on 'ineligible' developments (i.e. those which fail to generate affordable housing contributions); and
- the findings of Table 1 (see above).

7.32 The full implications of the three scenarios for the estimated number of dwellings to be provided in different locations are set out in Table 2. A more visual illustration of these implications is provided by Diagrams 1-3.

Scenario A

In essence, this first option is based on maintaining the policy 'status quo' set out in the current Local Plan (ref. Policies 1-5 which form the 'Development Strategy').

This scenario would:

- allow infill residential development only within the boundaries of the seven towns, three Large Villages and seventy-seven Selected Small Villages designated in the current Local Plan (subject to addressing any perceived anomalies in the boundaries);
- allocate land in Fakenham for **approximately 160 dwellings**, in addition to the sites for five or more dwellings in the principal settlements identified in the UHCS;
- allow small windfall affordable housing schemes in the designated Countryside under a new 'rural exception site' policy; and
- prevent any opportunities for the conversion of buildings in the designated Countryside to permanent residential use.

The advantages of Scenario A can be summarised as follows:

- Almost all the new housing developed would be on brownfield sites, therefore helping to achieve the Government's aim of minimising the amount of greenfield land taken for development.
- There would be minimal impact on the landscape setting of towns and villages and the wider countryside.

The disadvantages of Scenario A can be summarised as follows:

- The overall density of the designated settlements would gradually increase, with pressure for development on 'undeveloped' land, including large gardens. This could lead to the character of certain parts of towns and villages changing and complaints of 'town cramming'.
- Development would take place on a number of small brownfield sites, on which it would be difficult to secure contributions to affordable housing and other community benefits without a significant reduction in the site-size threshold.
- Since development would be coming forward incrementally, at a somewhat unpredictable rate, opportunities for negotiating improvements to local infrastructure and other community benefits could be hampered.
- It is likely that both the pattern and rate of housing development will continue along the lines of the period since the adoption of the Local Plan. With almost half of all development having taken place in the villages, a large amount of housing will again be located in areas where access to jobs, schools and community facilities is relatively poor.

Scenario B

This second scenario is based on preventing the expected occurrence of windfall housing provision in the current seventy-seven Selected Small Villages and, instead, recreating this spare provision as housing allocations, subject to a discount created by the passage of time in adopting policies in the new DPDs (see Table 2). These would be located in the towns of Fakenham and North Walsham in view of their current status as 'Growth Towns'. This option would:

- make Fakenham and North Walsham the main focus for new housing development by allocating land for **approximately 1,000 and 340 dwellings respectively**, in addition to the sites for five or more dwellings in the principal settlements identified in the UHCS;
- from approximately April 2008, prevent any opportunities for residential development outside the ten principal settlements except for small windfall affordable housing schemes under a new 'rural exception site' policy; and
- prevent any opportunities for the conversion of buildings outside the ten principal settlements to permanent residential use.

The advantages of Scenario B can be summarised as follows:

- A significant proportion of new housing development would take place on large sites, where opportunities to secure an appropriate element of affordable housing and other community benefits would be maximised.
- Since both the location and timing of development could be more easily predicted, it would be easier to plan for necessary improvements to local infrastructure and other community benefits (such as roads, drainage, schools, open space etc.).

- Almost all new development would be in settlements with relatively good access to jobs, schools and community facilities, therefore reducing the need for car journeys from new housing and helping to achieve the Government's aims in this regard.
- The character of existing villages would be maintained.

The disadvantages of Scenario B can be summarised as follows:

- There would be some impact upon the landscape setting of both Fakenham and North Walsham.
- Affordable housing in villages provided under a revised *rural exception site* policy would depend heavily upon subsidy via cheap land and/or public funds, as cross-subsidisation with market housing development would not be possible (although cross-subsidisation with discounted and shared-ownership housing would be a possibility).
- With virtually no new housing development taking place in the villages, opportunities to effect change or improvements within them would be very limited. This might lead to the perception, over time, that the villages are 'stagnating'.

Scenario C

The third and final option is, like Scenario B, based on preventing the expected occurrence of windfall housing provision in the current seventy-seven Selected Small Villages. Instead, this spare provision would be recreated as housing allocations in the towns of Fakenham, Holt, Stalham and Wells-next-the-Sea, the Large Village of Hoveton and as a number of small allocations in the vicinity of established villages, subject to a discount created by the passage of time in adopting policies in the new DPDs (see Table 2). The choice of these locations is the result of a more direct response to the issues identified earlier in this topic paper. This option would:

- allocate land for housing development in Fakenham (**approx. 640 dwellings**) Holt (**200 dwellings**), Stalham (**100 dwellings**), Wells-next-the-Sea (**100 dwellings**), and Hoveton (**100 dwellings**), in addition to the sites for five or more dwellings in the principal settlements identified in the UHCS;
- from approximately April 2008, prevent any opportunities for residential development outside the ten principal settlements except for small housing allocations in the vicinity of approximately ten 'service centre' villages (some for mixed housing developments and some for affordable housing schemes under a new 'rural exception site' policy) amounting to **200 dwellings**; and
- prevent any opportunities for the conversion of buildings outside the ten principal settlements to permanent residential use.

The advantages of Scenario C can be summarised as follows:

- A significant proportion of new housing development would take place on large sites, where opportunities to secure an appropriate element of affordable housing and other community benefits would be maximised.
- Since both the location and timing of development could be more easily predicted, it would be easier to plan for necessary improvements to local infrastructure and other community benefits (such as roads, drainage, schools, open space etc.).

- Housing allocations under this option would have reasonably good access to jobs, services and community facilities, therefore helping to reduce the need for car journeys from new housing and helping to achieve the Government's aims in this regard.
- Affordable housing could be provided in the villages without the need for any significant public subsidy.
- The character of existing villages would be maintained.

The disadvantages of Scenario C can be summarised as follows:

- There would be some impact upon the landscape setting of settlements where allocations would be made, although, in the main, the size of sites would be appropriate to their location and to the capacity of the settlements in which they are located.
- With virtually no new housing development taking place in most villages, opportunities to effect change or improvements within them would be very limited. This might lead to the perception, over time, that some villages are 'stagnating'.

Summary

The three scenarios explored above have been initially assessed in terms of their impact on travelling, their impact on the landscape setting of individual towns and villages in general, their ability to secure an appropriate element of affordable housing and other community benefits, and their ability to assist other service providers in planning for improvements to community infrastructure. The comments derived from undertaking stakeholder consultation on these scenarios will inform the preparation of options for a development strategy.

TABLE 2: HOUSING LAND SUPPLY AND CAPACITY OF SETTLEMENTS (number of dwellings) WITH SCENARIOS A, B & C

Town/ area	Completions (01 – 05)	Under construction (Mar '05)	Extant Planning Permissio ns (Mar '05) (6)	UHCS site capacity (March '05) (1 & 7)	Predicted windfall Capacity (05 – 21) (2 & 6)	TOTAL	Percent of town developm ent	Estimated Village windfall 2005-2008	Scenario A Allocations	Scenario B Allocations (8)	Scenario C Allocations (9)
Cromer	127	65	190	191	213	786	25%				
Fakenham	135	29	117	121	142	544	17%		159	1000	641
Holt	98	48	73	0	86	305	10%				200
North Walsham	103	30	139	263	138	672	22%			341	
Sheringham	160	35	60	94	124	473	15%				
Stalham	28	15	47	62	34	187	6%				100
Wells	38	6	19	36	48	147	5%				100
Towns Sub-total	689	228	645	767	785	3114	100%				
Briston/M. Constable	69	33	144	47	69	362	12%				
Hoveton	12	19	14	0	20	65	2%				100
Mundesley	26	18	32	16	124	215	7%				
All other parishes	479	181	365			1025	33%				200
Selected Small Villages (5+ dwellings)					(1) 376	376	12%	(8) 71			
Selected Small Villages (2-4 dwellings)					(3) 501	501	16%	(8) 95			
Selected Small Villages (1 dwelling)					(4) 582	582	19%	(8) 111			
Villages Sub-total	586	251	554	63	1672	3126	100%	277			
TOTAL	1275	479	1200	830	2457	6241					

Regional Spatial Strategy Allocation**Under provision****6400****159****1341****1341****1182 (5) = (1+3 + 4 – 8)****Notes**

1 This is based on sites with an expected capacity of five or more dwellings.

2 This is based on sites of four dwellings or less.

3 This is based on sites of two to four dwellings.

4 This is based on sites of one dwelling.

5 Provision in Selected Small Villages (minus lapse rate) which could be re-allocated.

6 Lapse rate of 7 % applied based on analysis of lapsed planning permissions between 1998-2005

7 UHCS figures analysis of sites (March 05)

8 Selected Small Village windfall rate based on 19% (ie 3/16 of 16 year period assuming time lag before policies come into effect)

Topic: Location of New Development

New development must be located in ways that achieve sustainable development. Government guidance is to locate most new development in towns or key service centres where local needs can be met reducing the need to travel, particularly by car.

Key Issues

- Lack of Affordable Housing
- Limited employment opportunities
- Rural diversification
- Need for Balanced Communities
- Flood Risk
- Coastal Erosion
- Viable rural communities
- Individual town issues

Policy Context

- PPS1: Delivering Sustainable Development
- Circular 05/2005: Planning Obligations
- Rural White Paper: 'Our Countryside: the future – A fair deal for rural England' 2000
- PPG3: Housing
- PPG4: Industrial and Commercial Development and Small Firms
- PPS6: Planning for Town Centres
- PPS7: Sustainable Development in Rural Areas
- PPG13: Transport
- PPG20: Coastal Planning
- PPG25: Development and Flood Risk
- RSS14: East of England Plan Consultation Draft
- Regional Housing Strategy for the East of England 2005-2010
- Sub-regional Housing Strategy for Rural East Anglia 2005-2009
- Draft Shoreline Management Plan 2004
- Norfolk Community Strategy 2004/09
- Norfolk Ambition 2003-2023

Background Information

'Settlement Planning for North Norfolk: A report of work based on travel to work analysis to inform the RSS and LDF'. North Norfolk District Council, Sept. 2005

Topic papers on Housing, Environment, Economy and Transport, NNDC Oct 2005

Draft Aim

To locate development where it will provide the opportunity for people to satisfy their day-to-day needs for employment, shopping, education and other services locally or in locations which minimise the need to travel and where there are modes of transport available in addition to the motor car.

Conclusion

The development strategy for the Core Strategy document will integrate the range of issues identified in all topic papers. This topic paper has examined the issues arising from consultations, the policy context and presents a summary of the identified needs of the towns. It also provides an analysis of the housing commitments which give rise to housing distribution scenarios. The scenarios are based on the Draft East of England Plan allocation of 6,400. If the allocation is increased, it will provide further flexibility on the range of distribution options.

Alternative Options?

Three scenarios are presented for illustration purposes in order to address the implications of a range of housing distribution patterns based on:

- Existing Local Plan approach and retaining village settlement boundaries
- Focusing major housing allocations on the two 'Growth Towns' in the District
- Targeted housing allocations to reflect the specific needs of the District's towns and rural communities.

It is not expected that any of these scenarios will become the preferred development strategy, but response to consultation on these scenarios will help inform the preparation of the preferred option.

Appendices

Appendix 1

- **Cromer:** 'Cromer is the District's principal coastal town and one of its largest centres. It functions as an important shopping and service destination for its local residents, as well as a major tourist and visitor centre' (para 7.65).

'Cromer's resident population is growing and the town therefore needs to carefully manage the potential growth of its retail, service and leisure offer. Maintaining and strengthening its important day-to-day offer, alongside its seasonal tourist and visitor attractions is fundamental to the centre's overall vitality and viability' (para 7.67).

'The town should also aim to maximise its attraction and status as the largest and one of the most popular tourist destinations in the District. It already benefits from a number of key attractions, including the cinema and Pier (which comprises the Pavilion Theatre), although there is a 'gap' in provision for the younger age groups. There is also an identified need for a new swimming pool/leisure complex. Despite its draw of visitors and tourists, the centre also lacks a quality restaurant offer to help promote a more diverse daytime and evening economy' (para 7.72).

'To conclude, DTZ recommend that the quality of Cromer's retail and tourist offer be updated, to create less reliance on seasonality and good weather' (para 7.74).

- **Fakenham:** 'The failure to provide for an element of the growth and capacity identified will inevitably have implications for the town centre's existing shops, as Fakenham will fail to 'claw back' the increasing proportion of shoppers and spend that is 'leaking' to larger centres and stores outside the District. This could also lead to pressures for new out-of-centre retailing. Nevertheless, DTZ has identified potential opportunity sites for new retail and mixed used development in the town centre, although more detailed analysis is required (see Volume 4) (para 7.49).

Although Fakenham's role and offer should primarily be focused on meeting the needs of its local population, DTZ believe there is also a significant opportunity to increase its tourist and visitor potential' (para 7.50).

- **Holt:** 'Holt is one of the most attractive and popular centres in the District. The Georgian architecture and choice of quality specialist independent stores draw shoppers and visitors from beyond North Norfolk..... There is also a strong and affluent second home market in the immediate area, and the presence of Gresham's public school in the town adds to its overall attraction' (para 7.59).

'Holt primarily functions as a niche centre, serving a strong tourist market and providing a complementary offer to the other North Norfolk centres. It has a larger number and mix of specialist shops, selling a wide range of goods including antiques, crafts, gifts, boutique and homeware items' (para 7.60).

'The centre's convenience offer is more limited..... As a result, a high proportion of its local population tend to shop at the Morrisons in Cromer for their main 'bulk' food purchases. There may, therefore, be a market opportunity for a medium-sized foodstore in Holt' (para 7.61).

'Unlike most of the District's coastal towns, Holt attracts more year-round visits and is therefore less vulnerable to seasonal fluctuations in holiday patterns. It is therefore vitally important that Holt's environment, character and choice of stores is maintained and enhanced in order to strengthen its future attraction and popularity. There is limited physical capacity to extend the shopping area as the town centre is in a Conservation Area and many of its commercial facilities are in listed buildings. DTZ therefore advise that retail development should be restricted in Holt in order to protect its environment and character. However, this could lead to increased pressures for out-of-centre retailing' (para 7.62).

'The town has a good mix of leisure facilities, although facilities for children and teenagers are more limited. Significantly some 60% of respondents to the street survey visited (or intended to visit) one of its cafés and/or restaurants as part of their overall trip to the centre. In this context, DTZ recommend quality additions to its current café and restaurant offer to help strengthen the centre's evening economy' (para 7.63).

- **Hoveton:** 'Hoveton is an important gateway centre to The Broads and is identified as a 'unique' centre in the Local Plan. Its retail offer is dominated by the independent retailer Roys, which operates from several large shop units in the centre. The centre has evolved to meet the needs of both its local catchment population and holidaymakers' (para 7.82).

'DTZ do not believe that there needs to be any significant increase in Hoveton's retail or service business offer. Those who shop in, and visit the centre, perceive its offer as being high quality' (para 7.83).

'There may be an opportunity to improve the quality of the café and restaurant provision to benefit holidaymakers, as well as the local population. This would also benefit the centre's overall vitality and viability, by encouraging longer dwell times and improving the evening economy' (para 7.84).

- **North Walsham:** 'As with Fakenham, the population is growing within the surrounding area. However, there is an increasing quality 'gap' between the centre's retail and leisure offer, and the needs of its growing population. This means that shoppers are increasingly travelling further away to larger centres that better meet their needs (such as Norwich)' (para 7.54).

'DTZ recommend that any improvements to the centre should initially focus on addressing the under-representation of fashion and commercial leisure uses. Although market demand is currently low, we believe that providing the right sized outlets in the right town centre location will help to generate demand for space in the centre' (para 7.57).

'An increase in the quality of the eating and drinking establishments and other new commercial leisure uses (particularly a cinema) would also help to generate more trips to the town centre and enhance its overall vitality and viability' (para 7.58).

- **Sheringham:** 'Sheringham is a popular, if more downmarket, coastal resort town. Its retail and leisure offer caters for the day-to-day convenience and service needs of its local residents, as well as the more specialist/recreational needs of its strong tourist and visitor population' (para 7.75).

'It has a good mix of shops and businesses, and low vacancy levels. The town's retail mix is well suited to its tourism-led customer profile.... The town centre also links well to the surrounding leisure attractions, such as the beach, theatre and North Norfolk Railway. However further development and improvement is needed to carefully balance the demands of the local population and tourists' (para 7.76).

'It is DTZ's view that there is a qualitative need for a supermarket in Sheringham to help 'claw back' a proportion of the shoppers and spend currently 'leaking' outside its local catchment, and to anchor its convenience and retail offer (para 7.79).

'DTZ also consider that there are significant opportunities to develop the leisure/tourism attractions and economy around the seafront. One opportunity could be to improve the quality of the centre's food and drink offer. Although Sheringham has several pubs, cafés and take-away outlets, it has an under-provision of quality restaurants. Such quality additions to the eating and drinking offer will help to enhance the evening economy, to the benefit of both the local population and holidaymakers' (7.81).

- **Stalham:** 'Stalham is one of the District's smaller centres and it functions primarily as a convenience and service destination for its local catchment population' (para 7.85).

'There is a need to reinforce the role and attraction of the High Street as the main shopping area, and reinforce the linkages with the Tesco store. The market research has confirmed that a significant proportion of the centre's local catchment travel to larger neighbouring towns for their comparison goods shopping and entertainment needs' (para 7.87).

'There has been an increase in the number of take-away outlets over recent years, but the centre has a limited provision of pubs and cafés. Increasing the provision in both the food and drink sector could help to broaden the town's attractions during the day and evenings. These improvements would benefit the local population, especially the younger residents, who are not currently well catered for' (para 7.89).

'The town should also aim to market and promote its attractive environment and close proximity to the Norfolk Broads. Key attractions, such as its two small museums and market, combined with the new Tesco store (many holidaymakers on the Broads will be self-catering) make the town an attractive destination for visitors and tourists '(para 7.90).

- **Wells-next-the-Sea:** 'The town is one of the smaller centres within the District, but is an important visitor and tourist destination. It performs a 'twin' role – catering for the day-to-day convenience and service-based needs of its local population, as well as providing a mix of specialist tourist and leisure uses' (para 7.92)

'DTZ agree with the Council's broad Settlement Strategy, which identifies the need for the town to focus and build upon its status as a tourist destination. Wells needs to develop itself as a seaside attraction, but one that offers a different and complementary offer to Cromer and Sheringham to the east. For example, Wells could create 'unique' attractions based around the flats next to the town, which we understand are a haven for wildlife. The attractive harbour area also represents a

significant opportunity to create year-round visitor attractions and promote quality restaurants, cafés and holiday accommodation' (para 7.95).

'The market research also highlighted that local residents travel to larger towns for their retail needs and entertainment. DTZ consider that the town would benefit from improvements to the quality of its retail and service offer to meet the growing demands of the local community, and also that of people living in the rural areas surrounding the town. However, a Conservation Area covers the town centre and there are a significant number of Listed Buildings in the prime shopping area, meaning that there are significant constraints to new development' (para 7.96).

North Norfolk



LOCAL DEVELOPMENT FRAMEWORK

Topic Paper Feedback Form

The draft topic papers are technical summaries of evidence and issues covering **Development Strategy, Housing, Economy, Environment and Transport**. These have been produced by NNDC Planning Policy team drawing from national and regional policy, evidence gained through a variety of independent studies and consultation events with community representatives.

We welcome any comments or suggestions you have regarding these documents.

Name: <i>or</i>			
Organisation:			
Date:		you wish to be added to LDF database?	YES / NO
Feedback regarding which TOPIC PAPER?	Development Strategy	<input checked="" type="checkbox"/>	Environment
	Housing	<input type="checkbox"/>	Transport
	Economy	<input type="checkbox"/>	
Comments	Please make any comments below attach additional sheets if appropriate.		

Thank you for giving us your views.

Please send this form to: Maxine Collis, Planning Policy Section, NNDC, Holt Road, Cromer, NR 27 9PZ or alternatively e mail your response(s) to planningpolicy@northnorfolk.gov.uk