

DELIVERABILITY STATEMENT:

LAND AT MARKET LANE, WELLS-NEXT-SEA, NORFOLK

On behalf of the Holkham Estate

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1.0 INTRODUCTION

- 1.1 Savills Planning Team in Cambridge have been instructed by the Holkham Estate to prepare a Deliverability Report for its landholding (W01) at Market Lane, Wells-next-the-Sea in the context of the North Norfolk District Council Local Development Framework, following publication of the Core Strategy Submission Document in June 2007 and more specifically the Site Specific Proposals Preferred Options DPD published in 2006.
- 1.2 This document has been formulated to help promote the benefits of the site based on its own characteristics, as well as its favourable position compared to other competing sites within the settlement.
- 1.3 The site is some 5.4ha in extent and has been allocated as one of the Council's two Preferred Options for the settlement of Wells-next-the-Sea within the Site Specifics Proposals DPD – the other being W02 (Maryland). The aim of this particular report is to provide a detailed evidence base which should assist the Council's Planning Officers in confirming the appropriateness of the site for residential development (and thereby retaining it as an allocation) and to confirm that there are no issues which we are aware of which would suggest that the site cannot be delivered in the forthcoming plan period.

2.0 METHODOLOGY

- 2.1 This document will look to promote the site in terms of its deliverability within North Norfolk's forthcoming Local Development Framework plan period. The site is shown in **Appendix 1** in the context of other sites put forward for residential development within Wells.
- 2.2 Following an analysis of the relevant policy background, the site's 'deliverability' will be discussed in terms of the proposed allocation's physical, socio-economic, environmental and policy attributes we feel it possesses. The site will be considered both on its own merits and relatively, compared to other relevant sites that are being promoted within Wells-next-the-Sea.
- 2.3 These categories will be broken down further into sub-headings with the overall aim of providing an appraisal of the site's suitability for a residential allocation within the North Norfolk LDF plan period.
- 2.4 Following on from the above analysis, the report will then summarise the main attributes of W01 and together with a contrast of competing sites (especially W03 Mill Road and W04 Northfield Crescent) will seek to promote W01's primacy in the context of fulfilling the majority of Wells-next-the-Sea's residential allocation within North Norfolk District Council's Core Strategy.

3.0 POLICY BACKGROUND

3.1 The following is written within the context of the East of England Plan. Policy H1 (Housing) allocates 8,000 dwellings to the North Norfolk District, of which 6,390 (or 430 per annum) dwellings remain to be built within the plan period (April 2006 – March 2021). This 8,000 figure represents an increase from the 6,400 originally allocated, justified by the high levels of housing need within the District - as identified within the Rural East Anglia Partnership *Strategic Housing Market Assessment (Fordham - 2007)*.

3.2 LDF Timetable

Core Strategy Submission DPD

3.3 The North Norfolk Core Strategy (Incorporating Development Control Policies) has recently reached the Submission stage of the Local Development Framework schedule, with a Public Examination into the soundness of the DPD having recently finished in January 2008. The Council is now awaiting the Inspector's binding report on the Core Strategy, which is due sometime between June and July this year.

3.4 The Submission phase of this Development Plan Document is important in the new LDF process since it is at this stage that the Council consider the document to be "sound" and is the document that has been put forward as the Council's strategic (and Development Control) policy document for Public Examination for consideration by an Inspector.

3.5 In terms of housing allocations within the Core Strategy (Submission) DPD, strategic housing policy is designed to:

"...ensure that over the remainder of the plan period sufficient housing will be built in the right places and of the right type to maximise the contribution it makes towards meeting identified needs." (para 2.5.1. - pg 30, Core Strategy Submission DPD - 2007)

3.6 In terms of housing numbers the Core Strategy reflects the East of England Plan's requirements for North Norfolk D.C. to provide a minimum of 8,000 dwellings within the plan period from commitments and allocations.

3.7 Due to approximately 2,060 dwellings having been completed by March 2007, and a further 1,510 extant permissions, Core Strategy Policy SS 3 (*Housing*) proposes that land allocation should accommodate for around 2,700 to 3,400 dwellings within the North Norfolk District, with suitable sites to be identified within the Site Specific Proposals DPD. Policy SS 3 also states that around 1000 of this remaining allocation will come from windfall sites (Core

Strategy submission document– pg 30). Such figures are based on the LDF evidence base including (among other documents) *PPS 3 – Housing; the Housing Background Paper; Strategic Housing Market Assessment (2007)* and *Housing Land Availability Assessment*.

- 3.8 Wells-next-the-Sea is identified as a ‘Secondary Settlement’ within the Core Strategy settlement hierarchy (Policy SS 1 – Spatial Strategy in North Norfolk). In this context it is a settlement in which:

“...a more limited amount of additional development will be accommodated (approximately20% of new homes)”. (Core Strategy Submission DPD - pg 27)

- 3.9 As a ‘Secondary Settlement’ within the Core Strategy’s settlement hierarchy, Wells-next-the-Sea has a total proposed upper allocation of 306 within the plan period (2001 and 2021) (Policy SS3 – *Housing – Core Strategy DPD Submission*). Taking away present completions (45), existing commitments (59) and windfall estimates (52), around 150 dwellings are left to be allocated within the town between April 2007 and March 2021.

- 3.10 Allocation of housing on site W01 would then accord well with Core Strategy Submission Policy SS14 (Wells-next-the-Sea) which stipulates that:

“...100-150 dwellings will be built on newly identified greenfield development sites well related to the built up area.” (Core Strategy Submission DPD – pg 58)

Site Specific Proposals DPD

- 3.11 In terms of the Site Specific Proposals DPD, despite Preferred Options consultation back in November 2006, the Inspector’s requirement to await the outcome of the strategic growth policies (i.e. Core Strategy DPD) before proceeding further, together with the need to include allocations in the Coastal Service Villages not considered in the previous rounds of consultation, has culminated in the need for a further round of Preferred Options later this year. This report is intended to assist the Council in confirming the appropriateness of the Market Lane site within any new consultation document that may be published.

- 3.12 In terms of development contributing positively to the wider settlement, the existing Site Specific Proposals DPD (Preferred Options) makes reference to Wells-next-to-Sea’s position as a popular visitor destination for tourists - especially during the spring and summer months. Within the context of this seasonal economic backdrop, the Council’s aims for the town (echoing those of the Core Strategy) are given, including:

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- “i) To reinforce the vitality and viability of the town as a visitor destination by:
 - preserving and enhancing its character
 - maintaining a suitable mix of shops and other appropriate use in its town centre;and
 - identifying a suitable site for a significant amount of additional car parking.*
 - ii) To ensure that effective use is made of the limited amount of industrial/ commercial land and buildings and existing opportunities are safeguarded.*
 - iii) To co-ordinate the use of areas where pedestrian access and appearance are crucial to the town’s attractiveness to visitors, particularly along the quayside.*
 - iv) To ensure that the important environmental characteristics of the town and its setting, including the AONB, are protected and enhanced when siting new development, and to exploit opportunities to enhance them.*
 - v) To make provision for additional dwellings in the period up to 2021 in a manner which gives priority to meeting the housing needs of the town and the surrounding area.*
 - vi) To ensure that adequate provision is made to meet the open space and recreational needs of existing and proposed residential development and to safeguard their existing provision.*
 - vii) To support the retention of key community facilities in the town.*
 - viii) To locate development away from areas of flood risk. ”*

(pg 118. Site Specific Proposals – Preferred Options)

3.13 In the above context, the Site Specific Allocations Preferred Options DPD highlighted our client’s site W01 (Market Lane), together with the smaller land holding W02 (Maryland) to fulfil the housing allocation requirements of the North Norfolk Core Strategy. Although the housing figures have somewhat changed between the publication of the ‘Preferred Options’ and ‘Submission’ Core Strategy documents, partly due to the publication of ‘proposed’ and ‘further proposed changes’ within the RSS, and the original Site Specific Allocations DPD not having the benefit of such a revision to its housing figures (Wells-next-the-Sea – pg 119), the allocation of both of these sites (W01 and W02) would still fulfil the majority of the remaining allocation for Wells i.e. 100-150 dwellings (Core Strategy Submission Policy SS 3 – Housing – pg33).

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- 3.14 Within the Site Specific Proposals DPD (Preferred Options) our client's land holding W01 was given a capacity of 100 dwellings at a net density of not more than 30 dwellings per hectare. It is assumed that with the inclusion of a small local park (approx. 1 Ha), development would be able to address public open space requirements and provide recreational facilities appropriate to the needs of the proposed development and the residential areas of the southern part of the town.
- 3.15 It is also considered that the site will accommodate some 40 affordable dwellings out of the proposed 100 allocated on the site.
- 3.16 The report will now refer to site specific issues relevant to the delivery of this allocation within Wells-next-the-Sea.

4.0 PHYSICAL SITE ATTRIBUTES – W01 – Market Lane

4.1 Physical:

i) Location:

4.2 Wells-next-the-Sea is located on the North Norfolk coast and is known as a traditional seaside town with its historical character being retained. The North Norfolk district is substantially rural in its nature, with the major settlements of Fakenham, Holt, Cromer and North Walsham located to the south and south east of the town. These are listed as ‘Principal Settlements’ within the Council’s Core Strategy Submission Document and are Wells’ nearest major service centres, with other ‘Secondary Settlements’ (such as Wells) within the district including Sheringham, Stalham and Hoveton – all to the east (Core Strategy Submission Policy SS 3 - Housing). Wells’ nearest neighbour is the ‘Service Village’ of Blakeney, which is located around 7 miles west.



Photo 1 – W01 – located in-between Market Lane (east) and the A149 (west)

ii) Relationship to Wells-next-the-Sea:

4.3 Wells is an established settlement with over 3,000 permanent residents. Our client’s land-holding W01 (Market Lane) lies on the southern edge of Wells. To the east lies the adjacent Alderman Peel High School; to the west across the road there are arable farm fields; to the north lies the beginnings of settlement of Wells and to the south lies a cemetery, with agricultural pastures further afield.

iii) Boundaries

4.5 The northern edge of the holding is contained by a heap mound with associated scrub vegetation and small trees growing on top which spans the length of the site. This represents part of an older railway line that is now disused. The eastern boundary of the settlement consists of a wire fence, with intertwined hedgerows that span a significant length of Market Lane. A substantial hedge row runs the entirety of the southern boundary, adjacent to a public right of way which extends from Market Lane to the B1105 further west. To the south west lies a farm house (Ashburton House) which has a garden immediately adjacent to the site's boundary. The western side of the site is contained again by hedging, with a gap present half way along for farm vehicle access from the B1105.

iv) Surrounding Areas

4.6 The wider area surrounding the landholding consists of land to the west, south and south-east and to the more urban form of the town to the north. The southern residential area of Wells commences immediately to the north of the site with a relatively new development called Manor Farm, which comprises of around 10 new traditional style houses. An area of housing then continues north towards Burnt Street, as well as further east along Waveney Close, which extends around the rear of the school. Any new residential development would thus be compatible with surrounding residential uses.

v) Land-use

4.7 W01 represents an agricultural land-holding in the ownership of the Holkham Estate, currently comprising overturned soil and consisting of chalk and other coarse grained rocks and other organic material.

vi) Topography



Photo 2 – topography of W01 – looking north towards the existing built up edge of Wells

- 4.8 The field represents a generally consistently level topographical area of land, with only some slight sloping towards its northern and eastern parts (see photo 3). Such a shallow gradient will not hinder any proposed residential development on site.

vii) Landscape views* (** See Appendix 3 for surrounding views looking into the site*)

- 4.9 Outward Views: The outward looking views from the site consist of a mix of mid to long distance panoramas towards the surrounding areas. Northerly views are mainly dominated by the town's immediate residential areas especially to the north east. Views to the north west consist of agricultural holdings which act as a visual buffer to similar housing forms further afield - see photo 3. St Nicholas Parish Church is visible to the north east of the site (Photo 4).



Photo 3 – Landscape views north (north west) towards Wells-next-the-Sea

- 4.10 Easterly views take in the immediate impact of the Alderman Peel High School which makes landscape views further afield more distorted, though a slight break in its form towards the south east reveals some mid-distance views of the surrounding area.



Photos 4 – North Easterly Views towards St Nicholas Church (NE) and Alderman Peel High School (East)

- 4.11 The extent of southerly views are again dependent on positioning, with those taken from the very south of the site extending towards forested areas around 1.3 km away, beyond the adjacent cemetery and low lying farm buildings (to the left of Photo 5).



Photo 5 – Southerly views towards forested areas – farm buildings located to the left

- 4.12 Finally, westward views consist mainly of more varied terrain, towards the forest boundary of the Holkham Estate (photo 6).



Photo 6 – Westerly views towards the Holkham Estate

- 4.13 In terms of landscape views across the site it is considered that both the south and westerly boundaries will need appropriate mitigation. This might consist of tree or vegetation planting as well as highlighting the need to address scale and layout within any development schemes proposed for the site. In order to address this issue, the Council has suggested incorporating an area of open space/ 'public park' (up to 1 hectare or 20% of the 5.4 Ha site) alongside any residential development on the site (see paragraph 3.14 above).
- 4.14 Other options considered within the Council's Site Specific Proposals DPD (Preferred Options) suggest capping the total number of dwellings at around 100 to help to moderate the

density of development. Finally, a graded scale (in terms of height) could also be utilised within the development – from the south towards the north and from west towards the east. This would also help to mitigate any impact the new built form would have on existing landscape.

viii) Access

- 4.15 Access exists via the western section of the site, where a gap in the hedge already provides practical movement to and from the site via the B1105 for farm vehicles. Visibility from this point is excellent towards the north and good looking south (see photos 7 & 8).
- 4.16 Access could also be possible towards the south west of the site, adjacent to the Ashburton House turn-off which currently represents a single farm track/ right of way. The existing track could be widened, in principle, on its southern side to accommodate two-way movement (photo 9). However, such widening would have to be achieved before the track reaches the cemetery to the south east of the site.
- 4.17 One further option might also be possible via Market Lane (photo 10), which would represent a safer alternative for potential residents, although the needs of students to gain safe access to Alderman High (opposite) would also have to be considered. A new access to our client's holding could be brought forward directly from Market Lane for pedestrian and vehicular modes. This would also complement the Waveney Close junction further up Market Lane.



Photos 7 & 8 – (B1105) Looking south and north from the existing agricultural access route



Photo 9 – Southern track / right of way



Photo 10 – Market Lane (potential access)

ix) Other Matters

4.18 A suspended power cable crosses the top (northern) third of the site from east to west and though not a major factor against development, its presence would require consideration within any development proposals for the site (see **Appendix 2** for photos). This might involve relocation underneath the ground or repositioning within the site's boundary.

x) Ownership

4.19 This entire site is under the ownership of the Holkham Estate who would be able to bring the holding forward at any point should the site be allocated for residential dwellings within the LDF process.

Environmental:

i) Ecology and Wildlife

4.20 Representing a substantial agricultural holding, the land is of high developable potential with hedgerows surrounding the majority of the site.

4.21 Though these hedgerows are found to the north, east, south and west of W01, these represent fairly low grade vegetation types, which could either be incorporated within future residential proposals for the site or, subject to an ecological survey, re-located together with any wildlife (if present) within to similar adjacent areas.

ii) Flood Risk

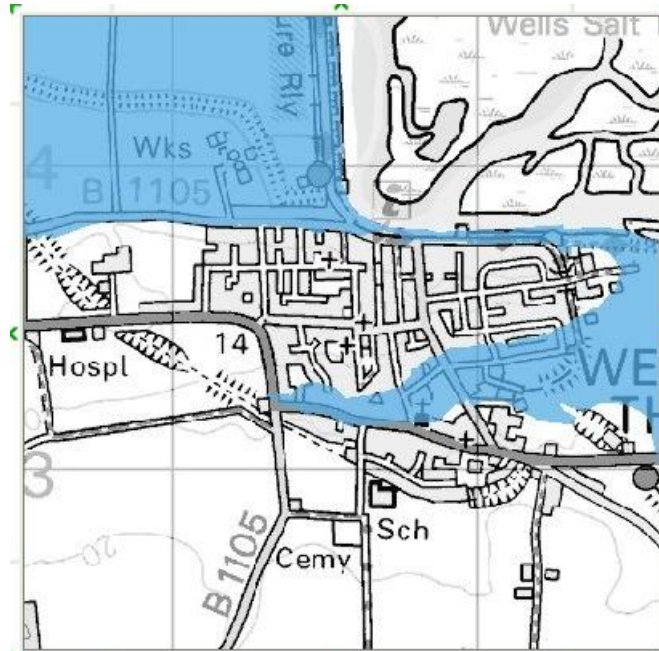


Diagram 1 – Flood Risk (EA web site: 2008)

4.22 Site W01 is not located within Environment Agency recognised floodplain, with the raised northern boundary (raised bank of the old railway) also providing the site with an element of protection from the flood zone further north.

4.23 Being outside such flood risk zones, the site then conforms with the requirements of PPS 25 *Development and Flood Risk*, which looks to discourage the placing of inappropriate development – i.e. housing – in areas of high flood risk. Residential development would represent a more than suitable use for this site, conforming well with PPS 25's requirement for Council's to allocate residential development in Zone 1 areas first.

4.24 *Policy:*

i) Local Policy Considerations

4.25 Taking into account the current status of the 1995 Local Plan, where significant numbers of policies have now expired it is relevant to identify AONB and Landscape Protection policies within this section.

4.26 The whole of Wells-next-the-Sea is within a designated Area of Outstanding Natural Beauty (AONB). Such a statutory designation infers that development anywhere within the town

would have to abide by the principles of the designation to ensure development would not “...detract from the special qualities of the Norfolk Coast AONB or The Broads” (D.C. Policy EN 1 – pg 79: Core Strategy Submission DPD). Development will however be permitted where it is,

“...appropriate to the economic, social and environmental well-being of the area...”
(pg 69 - Core Strategy submission document).

- 4.27 We consider that residential expansion within the LDF process is appropriate to Wells’ socio-economic circumstances, assuming that residential development of W01 will satisfy a large majority of the housing need that has arisen within the town over the past few years. Such need is partly the result of inflationary prices resulting from high demand for secondary homes and partly a result of a high proportion of low average wages paid for service jobs within the town polarising housing affordability and the purchasing power of local residents (Core Strategy Submission DPD). In line with comments from the Site Specifics Proposals (Preferred Options) DPD and our analysis, we consider W01 as the most appropriate of the potential residential allocations with respect to the overlying AONB consideration, and its limited impact on surrounding views (see paragraphs 4.9 – 4.13 above and **Appendix 2** for views into the site).
- 4.28 Development Control Policy *EN 2* requires proposed development to protect and enhance the overall landscape character, and the landscape setting of the settlement of Wells which consists mainly of ‘*Rolling Coastal Heath and Arable*’ views, as defined within the Core Strategy Submission document (pg 71).
- 4.29 By incorporating mitigation against any impact on landscape views including landscape buffers to protect views from the south and west, a grading of development from these directions, addressing housing density and the inclusion of public open space within future proposals (to serve the south of the town), we feel such measures are appropriate in terms of satisfying any Landscape Protection concerns (D.C. Policy EN 2), as well as preventing any detraction from the special qualities of the AONB designation (D.C. Policy EN 1).
- 4.30 The site also has distinct advantages in terms of its positioning, topography, adjoining realm, surrounding land uses, existing and potential access options, ecology, flood risk and policy. The site is clearly developable and the following section highlights the existing services and facilities in Wells which will both support and benefit the residential allocation on the site.
- 4.31 Following this, a comparison of W01 with the other competing sites will look to identify our client’s holding as being wholly suitable and capable of maintaining its position as the Preferred Option for a significant residential allocation within Wells-next-the-Sea.

5.0 SOCIO-ECONOMIC ATTRIBUTES

i) Transport links

5.1 The settlement is most accessible via road, via the B1105 which connects north to the A149, and heads west towards Holkham and Burnham Market. The A149 also heads east towards Blakeney and to Cromer Beach. Heading south towards the centre of the County, the B1105 offers easy access to Norwich (via the A1067) and other destinations within the region.

5.2 Though Wells-next-the-Sea is not on the mainland railway, such means are accessible via the settlement of Sheringham, which lies 15 miles east and offers services to Norwich (east – via an hourly 60 minute service, during peak periods) and Kings Lynn (west – every hour, duration: 2 hours 40 mins.) for either residents or seasonal tourists. The Wells & Walsingham Light Railway also runs from Wells towards Great and Little Walsingham, and though considered a tourist route it does provide some extra connectivity to the wider region.

5.3 Local bus services include the ‘Coastal Hopper’ which runs from King Lynn, via Wells towards Sheringham. This service runs through Wells roughly every hour and stops (among other areas of the town) along the A149 (Burnt Street) which adjoins Market Lane less than 0.1 miles north of our client’s site.

ii) Services



Photos 11 -13 – Staithe Street, St Nicholas Church, and the Buttlands (open space)

5.4 For a town of its size, Wells is considerably well served in terms of local retail, social, educational and recreational amenity. **Appendix 3** represents a map that shows the location of some of these services on offer within the town, including shops/ post offices; police/ fire stations; doctors/ health centres; schools; areas of open space and pub/ Bed and Breakfast facilities.

5.5 The breakdown of the most relevant services is as follows:

Economic: Post Office (8); supermarket (Cost Cutter – 10); pharmacy (13); local shop (2); bank (Barclays – 9); a hotel/ B&B (2) and a Youth Hostel (5)

Social: Two schools (16 and 17); separate police (22) and fire stations (20); a residential hospital (15) and a place of worship (St Nicholas Parish church – 1).

Recreational: Various pubs (3, 4 & 18); an area of open space (22 - see also next section) and the Harbour (north).

(see [Appendix 3](#) for location of these services)

5.6 This wide range of local services are all within walking distance of the site and also enhance the sustainability of the site, in terms of reducing the need of residents to travel further afield for goods and services. There will invariably be situations where residents will have to commute, either for reasons of work; in order to purchase high-order goods and services or other recreational reasons, but the town's existing offering is suitable for most day to day needs.

5.7 The town also has a small variety of vacant A1 (shopping) premises which could also support further growth should an extra critical mass of customers become resident within Wells' boundary in terms of the residential allocation of W01 (Core Strategy Policy SS 5 – Economy). These vacant units are mainly located around the main shopping area.

iii) Open Space

5.8 The site is located roughly 0.25Km from the Buttlands open space which is located to the west of the centre and is currently well utilised by the public (see site 23 of [Appendix 3](#)/ photo 13). The incorporation of a small park on part of site W01 would give added community benefit to both potential residents and those already based within the south side of Wells, which is currently lacking in similar accessible recreational space. The inclusion of open/ green space within W01 would then be in line with Core Strategy Policy SS 4 (Environment):

“Open Spaces and areas of biodiversity interest will be protected from harm, and the...enhancement...and linking of these areas to create green networks will be encouraged through a variety of measures such as:

Maximising opportunities for creation of new green infrastructure and networks in sites allocated for development.”

(Core Strategy Policy SS 4 Environment - Core Strategy Submission Document – pg 37)

5.9 Such an addition is also in line with Core Strategy Submission Policy SS 3 (Housing) and Development Control Policy CT 2 (Developer Contributions) which look for the future distribution of new residential development to be concentrated, in order to enable the Council to secure improvements to make such developments acceptable – either via conditions or Section 106 agreements.

iv) Sustainability

5.10 The site’s close positioning to the existing town centre and its varied economic and social service base (see **Appendix 3**); proximity to different public transport routes (including bus and train) and inclusion of (up to) a 1 hectare area of public open space within future development proposals all fulfil substantial parts of the requirements of PPS 1 – “*Delivering Sustainable Development*”.

5.11 In terms of building sustainability, development proposals would also look to embrace principles of the PPS1 Supplement – “*Planning For Climate Change*” and PPS22 “*Renewable Energy*”, especially changes that have been brought about to the Building Regulations concerning building efficiency (Part L). Such design specifics will be reserved for any actual application that would be submitted if a residential allocation was to be brought forward.

v) Affordable Housing

5.12 Any development on site would look to meet the 40% level as proposed within the Site Specific Proposals Preferred Options DPD. Such a figure is representative of local need demonstrated within the 2007 Housing Needs Study that identified, for example, that between 2007 and 2011 there would be a district wide need for some 921 affordable dwellings per year, which is almost double the required annual completion rate (for all types of dwelling) in North Norfolk.

5.13 The issue of affordable housing in terms of numbers of exact numbers, types and tenure will of course have to be addressed at the appropriate detailed stage.

6.0 OTHER SITES

6.1 Site W01 was selected by the Council as a proposed allocation in the last round of consultation due to its development potential, as detailed within the earlier sections of this statement.

6.2 The remaining sites (listed below – see [Appendix 1](#) for location map) possess a number of features that the Council considered unfavourable in the context of site W01, within the Site Specific Proposals Preferred Options DPD. These included size, current Local Plan designations, access, flood risk, sustainability and deliverability. As land holding W02 (Maryland) is also a joint Preferred Option, the remaining discussion will focus on the remaining two sites – W03 and W04.

i) W03 (Land south of Mill Road/ Furlong Hill)

6.3 This slightly smaller site lies to the west of the settlement and is considered highly prominent in terms of landscape views from the south, as it is located on a rising plateau that continues up towards the A149, north west of the Wells settlement.



Photo 14 – northerly view from south

- Displays the visible rising topography of site W03; compared to that of W01 (see [Appendix 3](#))

6.4 In terms of the landscape impact (Core Strategy Policies EN 1 and 2), it would be difficult for development on this site to not detract from the special qualities of the AONB (DC Policy – EN1). Core Strategy Submission Policy is designed in a way to limit such potential impact:

“Proposals that have an adverse effect will not be permitted unless it can be demonstrated that they cannot be located on alternative sites that would cause less harm...”

(EN 1 Norfolk Coast AONB and The Broads).- Core Strategy Submission DPD, pg69)

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- 6.5 As W01 is available as an alternative site, W03 therefore fails the options test set out in Policy EN1.
- 6.6 Though not in the flood plain and of a reasonable size, site W03's underperformance in terms of landscape policy issues substantially reduces its deliverability potential compared to existing Preferred Option W01.
- ii) W04 (Land East of Northfield Crescent)
- 6.7 Located to the east of the settlement of Wells-next-the-Sea, W04 represents a substantially smaller holding that would have relatively little impact in catering for Wells' residential allocation within the forthcoming plan period. Any allocation on this site would also drastically reduce the Council's ability to account for developer contributions which could then be used to offset infrastructure demands any residential development on the site would have on the town (D.C. Policy CT 2 – *Developer Contributions (Core Strategy Submission DPD –pg 103)*)
- 6.8 Though it has access from Northfield Crescent, which serves an existing adjacent residential area, this site has a substantial covering of shrub and low lying vegetation and is highly visible within the eastern landscape area.
- 6.9 Any development proposals on this site would also have to address amenity issues in terms of overlooking into the gardens and rear windows of houses immediately west of the site. These issues are less of a constraint in relation to our client's holding – W01 – where the only mitigation in terms of views and amenity relate to Ashburton House (south west of the site).
- 6.10 Such a culmination of issues relating to size, landscape and amenity impact immediately highlights this site's under-performance when assessed against site W01, which possesses fewer constraints and is capable of absorbing a much larger proportion of Wells' residential allocation.
- 6.11 W03 and W04 therefore represent sites that have planning issues which have led the Council to, quite appropriately, reject them as development sites.

7.0 CONCLUSIONS

- 7.1 From the above physical, environmental, socio-economic analyses and comparison of W01 to other competing sites, we can see that the Council's existing Preferred Option has distinct advantages in terms of its positioning, topography, adjoining realm, surrounding land uses, existing and potential access options, ecology, flood risk and lack of policy constraints.
- 7.2 W01 is a highly developable site, in terms of its site and its situation to Wells-next-the-Sea. The site is well located close to existing residential areas, has defined boundaries with good connectivity to the local road network, is of a highly developable topography and would have limited impact on inward views from the south and the west – impact which can be mitigated against via a variety of measures described in paragraphs 4.13 and 4.14.
- 7.3 Environmentally the site's current agricultural land usage reduces the possibility of any major ecological or wildlife impact residential development on the site might cause, especially when the addition of an area of public open space (within future proposals) is factored in – which would also expand upon the presently lacking variety and amount of species already on site. The site is also outside of any recognised floodplain; although relocation of the current power lines that traverse the site might require adaptation or relocation to within the site.
- 7.4 In terms of socio-economic advantages, the site is well connected in terms of transport links and services and would complement and support the existing economic, social and recreational facilities located within and around Wells. The incorporation of a portion of public open space within the development would, aside from lessening landscape impact, provide the residents of the south of the town with an extra recreational option other than the existing green space (see the Buttlands - no. 23 - [Appendix 3](#)) and harbour side further north (Core Strategy Policy SS 4).
- 7.5 Affordable housing levels would be consistent with the 40% level sought by the Site Specific Proposals Preferred Options DPD and views on the potential density of the site may serve to limit impact on landscape views.
- 7.6 The site therefore represents a highly sustainable development opportunity in terms of its density, incorporation of open space, minimal impact on ecology and wildlife, lack of flood risk and potential to incorporate a high level of affordable housing.
- 7.7 Finally, in terms of other sites, it has been demonstrated that W01 performs considerably better than its contenders with only the aforementioned landscape impacts which can be suitably mitigated against in order to bring development forward on the site.



7.8 We therefore wholly support W01's existing status as the joint Preferred Option for a residential allocation in Wells-next-the-Sea and would continue to support it as the Council's favoured location within the forthcoming additional round of Preferred Options consultation, due later this year.



APPENDICES

Appendix 1 – Location of W01 (Market Lane) in context of other sites



Appendix 2– Inward Views looking towards the site



i) View from the south looking north towards Wells (site behind the tree line – to the right of Ashburton House)



ii) View from the north looking south east ('Wo1' - middle left)

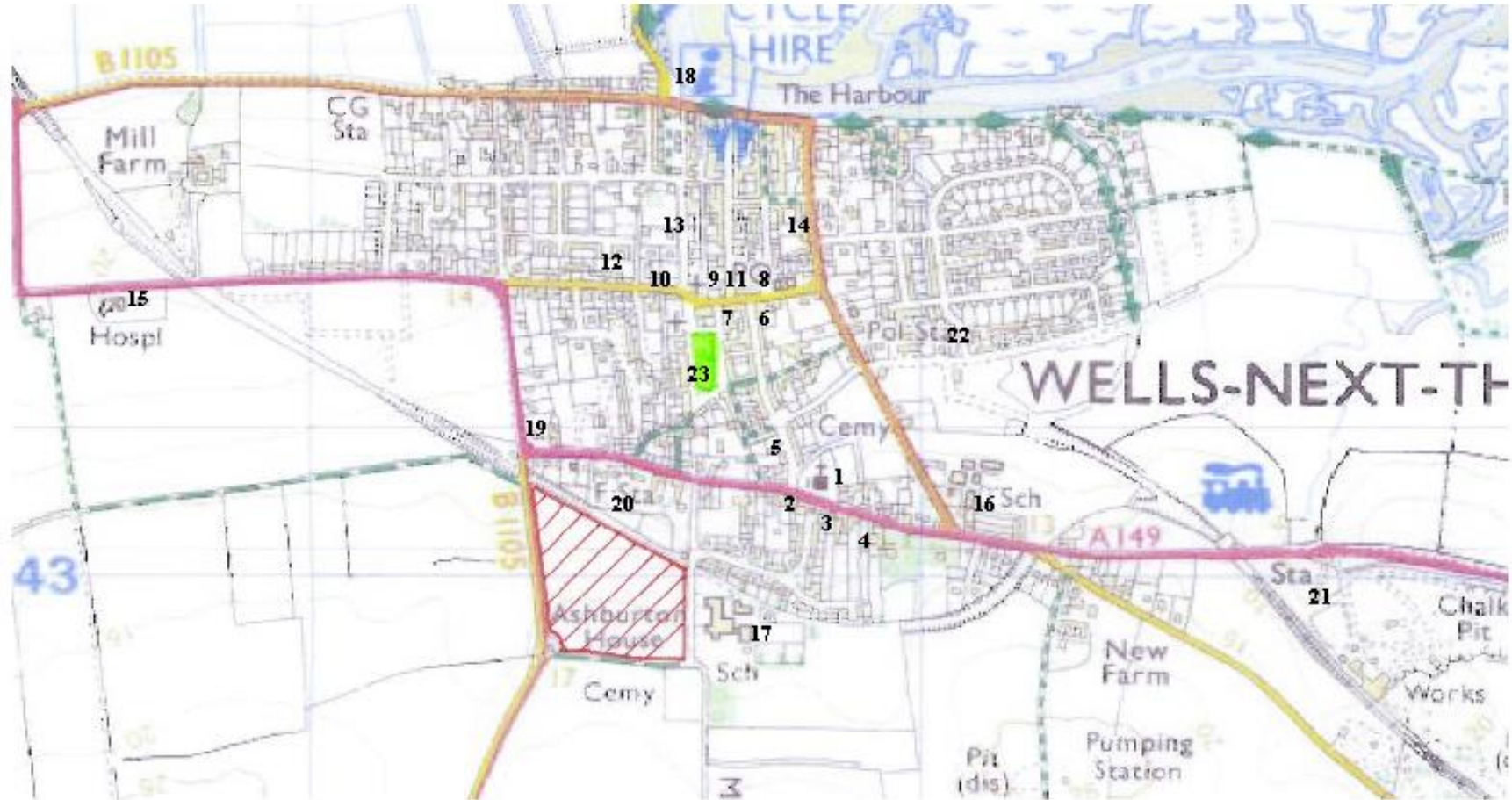


iii) View from the west looking eastwards



vi) View looking east.

Appendix 3 – Map illustrating some of the major services



List of Sites

- | | | |
|--------------------------------------|--|---|
| 1 – St Nicholas Parish Church | 11 – Cosmetics shop | 21 – Train Station (tourist route) |
| 2 – Mackrimore B+B | 12 – Cost Cutter (shop) | 22 – Police Station |
| 3 – Shop | 13 – Pharmacy | 23 – Public open space ('Buttlands') |
| 4 – The Bowling Green (PH) | 14 – Present Box (Shop) | |
| 5 – Youth Hostel | 15 – Community Hospital (NHS Trust) | |
| 6 – Barclays Bank | 16 – Primary School | |
| 7 – Edinburgh Hotel (B&B) | 17 – Alderman Peel High School | |
| 8 – Post Office | 18 – Harbour side | |
| 9 – Estate Agents | 19 – Caravan Park | |
| 10 – Optometrist | 20 – Fire Station | |

Appendix 4 – Location and orientation of photos taken on-site and around Wells-next-the-Sea

