

NNDC LDF Site Specific Proposals Examination in Public
Further Written Statement
Comment by Hugh Ivins BA MRTPI

Addendum following the Inspectors PHM of 8 June 2010.

Comment ID SSPDP710

Matters and Issues for General Matters on Days 1 and 2
Inspectors Questions;

- i) No
- ii) On approving the NNDC Core Strategy, the Inspector in his report (para 5.61) stated that the Council recognises that it needs to be more pro-active in identifying housing development opportunities through the LDF, and that(para 5.66) if the plan making process was starting now it might well be deemed to be unsound. In respect of PPS3 (June 2010) para 54, it is understood the Council is currently undertaking a SHLAA update 2010 which will inform the deliverability and timescale (over 5,10 & 15yrs) of available sites.
- iii) The recent change of Government has resulted in a number of policy statements for LPA's and Inspectors regarding the abolition of Regional Strategies, which may affect the 'soundness' of the SSP document.
- iv) The Core Strategy has 6 Core aims, the first is to address the housing needs of the whole community and the second is to provide for sustainable development and mitigate and adapt to climate change. It is considered that the draft SSP does not provide for a sufficient level of deliverable housing allocations over the plan period to satisfy the requirements of the Core Strategy.
- v) i)In respect of Policy SS7 and housing delivery in Cromer, the Core Strategy Inspector (para 5.152) was of the view that the plan could be over reliant on windfalls and that some potential development sites identified in earlier consultation may prove difficult if not impossible to deliver and the strategy should seek to increase the housing numbers target and identify additional development sites to ensure full housing delivery from allocated sites. The latest NNDC housing need survey in April 2010 identified a need for 634 units. In this respect further housing allocations should be considered within the plan period.
ii)With regard Policy SS1 respect of Catfield, the Core Strategy Inspector (para 5.26),confirmed the village meets the required level of services (for a Service Village) and has a large employment area. In respect of Policy SS3 residential allocations will be for 26 dwellings, however the SSP only proposes an allocation of 15 units over the plan period.
- vi) In respect of Greenfield allocations the Government responded to the Taylor Review of the Rural Economy and Affordable Housing in March 2009, with a reminder that there is an urgent need to provide both market and affordable

- housing in rural areas and stating that while 'open countryside' clearly has landscape value it is not always of greater environmental or community value'.
- vii) National policy advice in PPS7 (para 21-22) states LPA's should support suitably located and designed development necessary to facilitate the economic and social well being of these designated areas and their communities, including the provision of adequate housing to meet identified local needs, subject to rigorous examination. In these cases development should be permitted where social and economic issues override environmental considerations.
 - viii) The Core Strategy Core Aim 3, sets out to protect the built and natural environment and enable peoples enjoyment of this resource. In this case a balance has to be struck between protection and promotion of such areas. There will be a reliance on other bodies such as Natural England and the Environment Agency to assess the impact of any development. The principal issue in such cases is to establish criteria to define at which point the impact is not sustainable or detrimental.
 - i) Corpusty is on the southern boundary of the District and about 10 miles from the North Norfolk Coast SAC/SPA/Ramsar designation, however the COR1 residential allocation requires prior approval of a scheme to monitor and if necessary mitigate possible impacts on such a designated area. This seems an excessive requirement in the circumstances.

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