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## North Norfolk District Council's Response to Inspector's Matters and Issues: Questions (ix) - (xvii) in relation to Holt

References in square bold brackets [xx] refer to Examination Library document numbers.

### 1. Introductory Remarks

- 1.1 This paper is prepared by North Norfolk District Council in response to the Matters and Issues identified by the Inspector and will provide the basis of the Council's position at the Hearing session.
- 1.2 The Council considers that the Site Specific Proposals Draft Plan [A1.1] is sound as submitted but has suggested a number of minor modifications to the submission document which can be considered by the Inspector. These changes are designed to improve the clarity and consistency of the plan and are listed in two schedules of possible changes. The Schedule of Minor Modifications [A1.4] includes minor editorial corrections, points of clarification, or are changes responding to points made by representors. The Council considers that none of these minor modifications, either individually or cumulatively, affect the overall thrust of the plan's policies and therefore further consultation or sustainability appraisal is not required. A small number of minor modifications are requested in Holt.
- 1.3 In addition to the Schedule of Minor Modifications the Council has asked the Inspector to consider a Schedule of Key Changes [A1.3]. These changes are more substantial in nature and have therefore been subject to further consultation and Sustainability Appraisal. The Council considers that the Plan is sound as submitted and that the suggested changes would go some way to addressing representations made about the Plan. No Key Changes are requested in Holt.

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### 2. Context for allocations in Holt

- 2.1 The introductory text to the Holt section of the Draft Plan [A1.1] sets out the strategic context within which the proposed allocations are made. The Core Strategy identifies Holt as a Principal Settlement and one of a cluster of three towns, along with Cromer and Sheringham which are closely related and perform complementary roles. The Core Strategy indicates that 250-300 dwellings will be provided on newly identified sites which are well integrated with the existing built up area and minimise the impact on the countryside, particularly the A.O.N.B and the Glaven Valley Conservation Area.
- 2.2 Two residential sites are proposed for development along with a new car park to serve the town centre. A number of generally suitable sites are available in Holt and the Council is proposing options that:
  - Do not result in residential development within the Area of Outstanding Natural Beauty or the Glaven Valley; and

- Are well related to the strategic highway network including the A148 and the existing public transport corridor, thus minimising cross town traffic movements; and,
  - Are visually self contained and minimise impacts on the landscape; and,
  - Are able to address a broader range of issues in terms of providing appropriately located public open space, highway improvements, and enhancements to employment and educational facilities; and,
  - Provide a car park accessible to visitors to the town centre and the town as a whole which is well related to the principle road network.
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### 3. Response to Inspector's specific questions

***ix) Are the individual housing allocations available, suitable, and achievable (i.e. "deliverable"), in the terms of PPS 3, such as to deliver a 5 year land supply?***

***x) Is there a reasonable prospect of the remaining allocations being developed within 15 years?***

- 3.1 PPS3 requires that Local Planning Authorities (LPAs) identify sufficient specific *deliverable* sites to deliver housing in the first five years. LPAs also need to identify a further supply of specific, *developable* sites for years 6-10 and, where possible, for years 11-15. To be considered deliverable sites should be available, suitable and achievable. To be considered developable sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be developed at the point envisaged.
- 3.2 The Council considers that all allocations in the plan are available and suitable and can be developed within 15 years. In addition, as stated in the response paper to Days 1 and 2, sufficient allocations are also considered achievable in order to deliver a 5 year supply of land. The Five Year Land Supply Statement and Housing Trajectory **[F4(ii)]** and the Strategic Housing Land Availability Assessments **[F4(i)]** indicate which sites the Council expects to deliver housing within the next 5 years in Holt. This is summarised in the attached table and below.
- **Available:** Landowners of both residential sites have indicated support for development and that sites are immediately available. Neither are subject to any ownership of legal restrictions that will prevent development.
  - **Suitable:** Site suitability for development has been tested by a process of Sustainability Appraisal, Appropriate Assessment and stakeholder and public participation and the Council considers that the proposed sites represent the most suitable for allocation. There are no major constraints facing the sites and they are in suitable locations for housing development. All sites are well related to existing development and services and are considered to have an acceptable landscape impact.
  - **Achievable:** Agents are promoting both of the sites. A regional house builder has acquired site H12. Development of the residential allocations is achievable within the Plan period and it is expected that elements of both residential proposals will deliver some housing within the first five years.
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***xi) Are the other allocations (employment, retail and other) appropriate and deliverable, and consistent with PPS 4? If not, why not, and does that make the DPD “unsound”?***

- 3.3 The Council has identified a car park site on the Thornage Road. This proposed allocation is on a site which has now secured planning permission (after consultation on the Draft Plan). The proposal is promoted by the land owner who has an intention to provide and operate the Car Park (possibly with partners). The planning permission fully reflects the policy requirements of the Draft Plan (Policy CP10) and the owner is currently progressing work to discharge the requirements of planning conditions so as to facilitate early delivery. The site is available, is suitable and enjoys planning permission, and development is achievable within the plan period.
- 3.4 The proposal will address a long term concern about the adequacy of car parking in Holt and will serve to underpin the vitality and viability of the town centre and its reputation as a niche market shopping and tourist destination consistent with the objective of PPS4 and Core Strategy Policy SS9.
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***xii) (With reference to Sustainability Appraisal) Are the allocations “sustainable”?***

- 3.5 The Sustainability Appraisal process looked at a range of sustainability factors covering environmental, social and economic criteria. The criteria favoured sites that have been previously developed, are well integrated, have minimal environmental impact and provide a safe and suitable location for new housing. Individual site results are contained in Part 2 of the SA report [A1.6].
- 3.6 There are a number of sites in Holt that perform relatively well in the Sustainability Appraisal process and some ‘score’ higher than the proposed allocations. The Council is proposing sites that perform well in the Sustainability Appraisal process and deliver other public benefits.
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***xiii) Are any of the allocations subject to any demonstrable and overriding infrastructure constraints (esp. water/sewerage/drainage; education; highways) which cannot be overcome by planning conditions and/or obligations?***

- 3.7 The evidence indicates that the sites are not subject to any overriding infrastructure constraints that cannot be overcome:
- 3.8 **Water / Sewage / Drainage:** Work associated with the Water Infrastructure Statement [A1.11] found that most of the development proposed at Holt can be accommodated within the existing discharge consents. On the basis of currently available information it is possible that approximately 50 of the proposed dwellings will be difficult to accommodate without improvements to the sewage treatment works. Minor Modifications to the document are requested to reflect this (MM3i,MM74d,g & h).
- 3.9 **Education:** The Education Authority has indicated that Primary School provision is acceptable, but some increase in Secondary provision (extension to playing field) may be required dependant upon the trend in school roles (see paragraph 14.0.30 of Draft Plan [A1.1]).

- 3.10 **Highways:** There are no outstanding highway objections in relation to any of the proposed allocations. The principle of new access to the A148 to serve site H9, 12 and 21 has been agreed by the Highway Authority although precise location and junction design has not been agreed. A minor modification is requested to ensure that any access design does not compromise the possible long term establishment of a rail line along the alignment of the A148 **[MM9&10** in document **A1.4]**.
- 3.11 The Constraints section of the Draft Plan highlights specific constraints facing each site that were identified through the site investigation process and these can be addressed through the normal planning process.
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***xiv) Are any of the allocations unsuitable by reason of any environmental or residential amenity issues/objections?***

- 3.12 The Council is satisfied that development on all allocations can meet residential amenity standards for existing and future residents, and that any environmental considerations have been addressed through the policy criteria and / or will be addressed through the normal planning process. Some representations raise environmental or residential amenity issues (see the Summary of Main Issues report **[A1.2]**). The Council is satisfied that these have, or can be, overcome as follows:
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**Site H09/12/21: Land at Heath Farm / Hempstead Road**

- 3.13 **Impact of development on the nature conservation value of the site and adjacent sites:** Some parts of the site and adjacent land which is designated as a County Wildlife Site(CWS) have wildlife value. This constraint is identified in the Draft Plan (para 6.1.5) and agreement in relation to the management of the CWS is a requirement of policy H09/12/21. Compliance with Core Strategy Policy EN9 will also be necessary. The site comprises a large area within which there is adequate scope to accommodate the proposed development and incorporate wildlife protect and mitigation measures. Much of the site is in agricultural use and its wildlife value could be improved. These matters can be resolved through the preparation of the required development brief and/or at the planning application stage.

**Site H15: Land at Cromer Road (Gresham's)**

- 3.14 **Transportation impact of development:** There is no objection from the Highway Authority to the allocation. The site is on the edge of the town, is slightly over one kilometre to the town centre and other facilities such as the doctors surgery and village store are within walking distance. Walking will be a choice for some trips. The roads adjacent to the site are good quality and have the capacity to accommodate the development. The site is on a bus route. It is likely that improved bus stops and local footpath enhancements will be required. There is a strong concern locally that additional traffic will use Grove Lane as an alternative/preferable route to access some facilities such as the supermarket, primary school and town centre facilities.
- 3.15 Policy (H15) requires that no direct access be formed to Grove Lane as a mechanism to discourage 'rat-running'. Suggested Minor Modification MM11 **[A1.4]** 'flags' the issue of possible traffic management measures should this be required at planning application stage.

- 3.16 **Proximity of the site to the town centre and other key facilities:** The site is not remote from facilities. Holt offers a broad range of facilities and services many of which lie within the town centre or nearby. It is not a large town and consequently many of the potential development sites, including the proposed allocations would have convenient access to these facilities and services. The proximity of both proposed allocations to the principal road network and the existing public transport network is an added advantage. Both sites can be served by pedestrian connections providing the choice and increasing the likelihood that residents will walk rather than drive. The Council does not regard either site as unsustainable.
- 3.17 **Scale and form of development:** The site is large enough to accommodate the level of development proposed and the area is heavily screened by existing tree belts. The final form of development will be a matter to determined at the planning application stage but the Council is satisfied that the amount of development proposed can be successfully achieved on the site in a way that respects the prevailing form and character of this part of town.
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***xv) Are there any other good reasons, including the availability and deliverability of clearly preferable alternative sites (which have themselves been subject to sustainability appraisal and public consultation), why the draft allocations might be considered “unsound”?***

- 3.18 The Council has appraised a range of alternative sites in Holt and considers that the allocation sites are the most suitable and that the plan is sound. Other sites were discounted for reasons such as location, poor highways access or visual impact. Evidence of the appraisal of alternative sites is contained in the Sustainability Appraisal report [A1.6]. Specific representations have been made that sites **H01 (Peacock Lane)** and **H04 (Land adjacent Holt Country Park)** should be included. Both these sites were identified as preferred options in earlier rounds of consultation recognising that development would be sustainable. The Council has however considered these options and has discounted them. Neither site is suitably located to deliver employment development in accordance with the requirements identified in the Core Strategy. Site H01 is within the AONB and would hence not accord with the Core Strategy and development here is assessed as resulting in unnecessary increases in vehicular movement across the town using roads which are already congested. Furthermore development on the site would not address the identified short fall of public open space on the southern side of the town. Neither site produces the public benefits associated with the proposed allocations.
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***xvii) Is any “unsoundness” in the allocations and proposals overcome by the Council’s schedules of Key Changes and Minor Modifications?***

- 3.19 The Council has suggested minor modifications to the submission document to address a number of concerns raised in representations. The Council considers that the Site Specific Proposals document is sound as submitted, and that the minor changes suggested do not alter the thrust of the Draft Plan which was subject to consultation, undermine its soundness, or result in a need for further consultation or Sustainability Appraisal.
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**Table 1**

Sites Update: Holt

Site	Is the Site Suitable?	Is the Site Available?	Deliverable / Developable			Current Position
			Dev Expected?	Major Infrastructure Constraints?	Agent?	
H12	Sites perform reasonably well in the SA process, are not in the AONB, have a good relationship with the strategic highway network and are able to deliver housing and other identified requirements including employment opportunities and appropriately located public open space.	Yes, as indicated in SHLAA.	Available immediately and owned by a regional house builder. Owner indicates commencement upon grant of Planning Permission. Some development expected within 5 years / will span 5 -10 year period.	New road junction to A148 and foul drainage improvements, timing of delivery is dependant upon prior approval of a development brief and development may require linking with adjacent sites.	Chaplin Farrant Ltd	Majority of site in three separate ownerships, single agent working on behalf of all owners, some work undertaken on masterplanning/feasibility. Hopkins Homes Ltd, regional house builders, have recently acquired H12 with a view to early development. Highway Authority have no objection to new junction to A148. Agent undertaking further work in relation to foul drainage and protection of adjacent County Wildlife Site.
H21		Yes, as indicated in SHLAA.	Within 5 years.	As above	Chaplin Farrant Ltd	
H09		Yes, as indicated in SHLAA.	Within 5 years.	As above	Strutt & Parker	



H15	Edge of town greenfield site outside of the AONB. Doctors surgery and village store are within walking distance	Yes, as indicated in SHLAA.	Modest delivery within 5 years/ will span 5 -10 year period.	Foul drainage improvements may be required.	John Martin & Associates on behalf of Gresham College	Agents progressing range of work necessary to submit a planning application including highway assessment, some discussion reference site layout.  Agents advise of interest in the site by house builder and that discussions are underway with a Housing Association.
CP10	Has been granted planning permission.	Yes, current owner intends to develop.	Planning conditions currently being discharged with view to start during 2010.	New road access, off site highway works (modest) and surface water drainage.	Mr Graham Chapman (owner)	Planning permission granted January 2010, applicant working to discharge conditions with view to starting on site as soon as possible. (planning ref : 20050518)