

North Norfolk District Council Local Development Framework Examination of Site Specific Proposals

Further submission in respect of CP10 by Paul Stevenson.

I would like to draw the Inspector's attention to the following further developments in respect of CP 10.

A) Site Specific Proposals Draft Plan (numbering as in the plan document):

6.3.1 Description

My representations and correspondence challenge the need for this site to be allocated to car parking, and in particular the Council's justification for this on the basis "there appears to be inadequate car parking facilities in the right place to meet demand". I have pointed out the disappointing lack of factual evidence for this assertion.

A further revision to the planning application for this site (PLA/2005/0518) submitted in October 2009 provided a Transport Assessment¹, which reported surveys of actual car parking usage in June and August 2009.

The assessment found that, in August at the height of the summer season, the three main car parks in Holt reach 'capacity' by 11 a.m. On the June dates, one car park was close to capacity at its peak period, but there were spaces in the other car parks. No information was provided on queuing for spaces or wait time, and no survey was carried out to try and establish the level of demand. The fact that the larger car parks in Holt may be busy at times in the height of the summer season does not in any way demonstrate a compelling case of need for a car park of the size proposed or, specifically, in the location proposed.

The assessment did identify a problem with the management of car parking in Holt in that the Station Road car park is heavily used by permit holders who park early in the day and stay for long periods. Meanwhile, the long-stay subscription car park on Cley Road is scarcely used. There is clearly potential to apply pricing and time restrictions to better manage the use of car parks by different types of user: using pricing and/or time restrictions to direct stay-all-day commuters away from the central car parks would free up additional capacity for short-stay shoppers and visitors.

PPG 13 states that councils "should encourage redevelopment or re-use of existing parking", and it is disappointing in the extreme that the Council has made no attempt to investigate making the best use of existing parking in Holt.

The Officers' Report to the subsequent meeting of the Development Control Committee concluded as follows:

¹ Thornage Road Car Park, Holt: Transport Assessment Final Report - October 2009. Scott Wilson

"7) Conclusion

Policy SS9 of the Core Strategy states that there are acute parking problems within the Town Centre and the site has been identified in the emerging Site Specific Proposals as the location for a new car park. Moreover, the submitted car parking survey, indicates a high level of occupancy of the towns car parks during a five day period in August 2009, although no evidence has been provided to justify that a car park of the specific size proposed is required to meet the need. Both the Core Strategy and Site Specific Proposals remain silent on the size of the car park required. Without such justification it could be that a smaller car park covering less of the site, which had more landscaping, would adequately serve the needs of the town and would at the same time have significantly less impact on the appearance of the Conservation Area and wider landscape.

Therefore, whilst the previous concerns of Officers in respect of highway and drainage matters have been addressed, it is still considered that the effect of the proposed development in terms of its visual impact and potential impact on the biodiversity value of the area would have a significantly detrimental effect on the character and appearance of this part of the Glaven Valley Conservation Area and wider landscape."

The recommendation to the Committee was as follows:

"That permission be refused in the light of the visual impact of the development and its potential impact on the biodiversity value of the area, to the detriment of the character and appearance of this part of the Glaven Valley Conservation Area and the wider landscape."

I therefore submit that despite the premature approval of the planning application for this site, there is still no factual evidence of an overwhelming need that justifies the sacrifice of this greenfield site in the Glaven Valley conservation area.

6.3.8 Deliverability

The Draft Plan states: "The deliverability of this proposal is therefore dependant upon the submission of further information. This allocation will therefore need to be reviewed following this consultation, and receipt of additional information.

Notwithstanding the Officers' recommendation, the Development Control Committee held on 10 December 2009 approved application 2005/0518 for a 405 space car park on a site in excess of 2.0 ha – i.e. CP10.

Since the applicant has been in possession of planning permission for some months, presumably the Council will now be able to provide the Inspector with the review of deliverability promised in 6.3.8, and it would be very helpful for this to be distributed before the hearings.

B) NNDC Test of Soundness document (March 2010).

In my representations, I drew attention to the fact that CP 10 had not been subject to proper public consultation and was not included in the 2006 SSP Referred Options proposal already the consultations detailed in chapters 2 and 3 of the SSP Draft Plan Consultation Document.

The Test of Soundness document makes no mention of the late inclusion of this site, which apparently resulted from a request by the owner of the site reported to the LDF Working Party in January 2009. The Test of Soundness document's blanket assertions on the soundness of public consultation and the inception and plan preparation phase is therefore incorrect in respect of CP 10.

I would like to reiterate my view that, contrary to the Test of Soundness, the Council has failed to comply with the requirements for public consultation respect of CP 10.

Paul Stevenson
29 June 2010