



Author	NNDC
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North Norfolk District Council's Response to Inspector's Matters and Issues: Questions (ix)-(xvii) in Relation to Hoveton

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, however, it 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 proposed in Hoveton.
- 1.3 In addition 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 Draft 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 Hoveton.

2. Context for allocations in Hoveton

- 2.1 The introductory text to the Hoveton section of the Draft Plan [A1.1] sets out the strategic context within which the proposed allocations are made. The Core Strategy identifies Hoveton as a secondary settlement and indicates that new residential allocations of between 100 and 150 dwellings, on sites well related to the built up area, should be made. The Site Specific Proposals Draft Plan therefore proposes to allocate a greenfield site adjacent to the doctors surgery on Stalham Road for approximately 120 dwellings and at least 2 hectares of public open space (site HV03).

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 Housing Trajectory [F4 (ii)] and the Strategic Housing Land Availability report (SHLAA) [F4 (i)] indicate which sites the Council expects to deliver housing within the next 5 years, and this is summarised in the site update tables attached to the Council's response papers. The allocation in Hoveton is available, suitable and achievable and expected to be delivered in the next five years, as summarised below:
- **Available** - The landowner of the site has indicated support for development and advised that it is immediately available. This is referenced in the Draft Plan under the Deliverability section of the supporting text (paragraphs 7.1.6 and 7.1.7) and is evidenced by SHLAA return forms from 2009 and 2010.
 - **Suitable** - the site's suitability for development has been tested by a process of Sustainability Appraisal, Appropriate Assessment and stakeholder and public participation and the Council considers that it represents the most suitable site for allocation in the settlement. There are no major constraints facing the site and it is in a suitable location for housing development – being well related to existing development and close to the doctors surgery and the high school. Further details are contained in the Draft Plan and in response to the questions below.
 - **Achievable** - Agents are promoting the site and a housebuilder has an option to purchase the site. Pre-application discussions have been held and agents have indicated that, should the site be allocated, housing will be delivered on the site within 5 years. Further information / evidence is contained in the Draft Plan [A1.1], SHLAA, Housing Trajectory, 5 Year Land Supply Statement [also F4 (ii)] and the attached table.

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 There are no other allocations proposed for Hoveton.

xii) (With reference to Sustainability Appraisal) Are the allocations “sustainable”?

- 3.4 The Sustainability Appraisal (SA) process looked at a range of sustainability issues covering environmental, social and economic factors. 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. Results are contained in part 2 of the SA report [A1.6]

- 3.5 Site HV03 is considered to offer a sustainable location for new development. It is well located for local employment and facilities, particularly the school and doctors surgery, and has good pedestrian links to bus stops and the railway station, enabling access to local and further afield jobs and services by means other than the car. It is expected to have a relatively low impact on biodiversity and has no major environmental constraints.

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?

- 3.6 The evidence indicates that the site is not subject to any overriding infrastructure constraints that cannot be overcome:
- **Water / sewage / drainage:** Work associated with the Water Infrastructure Statement [A1.11] found that the full extent of the proposed development at Hoveton can be accommodated within the existing volumetric consent at the WwTW. See Appendix 1 of the Water Infrastructure Statement for details.
 - **Education:** The Education Authority have indicated that pupil numbers in the area are declining and there is scope to expand on existing school sites, so it should be possible to accommodate pupils generated from the proposed housing (see paragraph 14.0.28 of Draft Plan [A1.1]).
 - **Highways:** There is no objection from the Highway Authority (see SA results sheet in SA report part 2 [A1.6]).
- 3.7 The Constraints section of the Draft Plan (paragraphs 7.1.5) highlights specific constraints that were identified through the site investigation process, however these can be addressed through the normal planning process.
- 3.8 **Air quality:** A minor modification has been suggested (MM13 in document [A1.4]) to reference that air quality monitoring near Wroxham Bridge has identified an air quality hotspot where the national objective for nitrogen dioxide is close to being exceeded. A concern was raised that increased traffic associated with new development will cause air quality to fall below minimum standards and that an air quality management and improvement plan should be required alongside any large developments. The Council has submitted a bid to Defra for 1 years air quality monitoring in Hoveton to obtain more detailed information. The outcome of this will determine what further work is required. A second minor modification (MM14) is proposed requiring contribution towards further air quality monitoring and an agreed scheme of mitigation measures if deemed necessary at the time of development. The Council will continue to investigate this issue.

xiv) Are any of the allocations unsuitable by reason of any environmental or residential amenity issues/objections?

- 3.9 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. Several 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:

- 3.10 **Scale and form of development:** The housing numbers were debated through the Core Strategy examination, and were found 'sound' and appropriate for Hoveton. Hoveton, and its neighbour Wroxham, offer a range of services and employment opportunities and a rail line also serves the village, providing sustainable means of accessing jobs and other facilities. The Council liaises with neighbouring authorities and has involved a wide range of organisations and service providers in plan preparation to ensure that activities can be co-ordinated (see paragraphs 2.1.12 and 2.1.13 of the Draft Plan). Highways are satisfied that the scale of growth identified for Hoveton can be accommodated without fundamental changes to the local transport networks and the Water Infrastructure Statement [A1.11] considers the cumulative impact of growth on waste water treatment works (see paras 4.8 to 4.10). Approximately 5,000 new dwellings are proposed at a new Eco-Community in Rackheath which will require significant appraisal through the planning application process. The PPS for Eco-Towns says that at least 50% of trips originating in Eco-Towns should be made by non-car means, and the Eco-Community Concept statement [E11] sets out a range of measures to encourage people to use appropriate modes of travel (see paragraphs 9.3 to 9.58). For example, bus and rail services will be improved along the route that serves Norwich, North Walsham and Hoveton, which could make these modes more attractive for existing and new residents, therefore potentially reducing existing congestion. New employment will be provided on the Eco-Community site and it is expected that most external employment journeys will be to Norwich rather than through Wroxham / Hoveton (para 9.4). Further detailed traffic modelling will identify any required improvements to the existing road network required as a result of development.
- 3.11 Site HV03 can accommodate the proposed number of dwellings, and at least 2 hectares of new public open space, at a density appropriate for the area. The shape of the allocation leaves areas of undeveloped land along Stalham Road and adjacent to the public footpath to the south of the site to retain open views. In addition the policy requires provision of landscaping along the Stalham Road frontage and a significant landscaped buffer along the public footpath.
- 3.12 **Transportation impact of development:** Stalham Road is a main 'A' road and the Highway Authority has no objection to the scale or location of development proposed (see SA results sheet in SA report part 2 [A1.6]. An initial Transport Analysis Report [I27] concludes that the transport implications of the proposed development are acceptable but that a comprehensive traffic calming scheme on Stalham Road is desirable. Agents have had pre-application discussions with the Highways Authority and agreed that the development can be served by a single point of access, by means of a roundabout which will be designed to the current 40mph speed limit [I27i]. This can also provide traffic calming benefits through a reduction in traffic speed.
- 3.13 Comments about existing congestion in Wroxham and Hoveton are also noted, however the allocation is unlikely to have a significant impact on the existing highway network. As stated above, the overall scale and distribution of growth has been examined and agreed through the Core Strategy and allocations in the Draft Plan deliver the expected scale of growth.

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”?

- 3.14 The Council has appraised a range of alternative sites in Hoveton and considers that the allocation site is the most suitable site and that the Plan is sound. Other sites were discounted for reasons such as location / remoteness from facilities, poor highways access or visual impact. Evidence of the appraisal of alternative sites is contained in the SA report [A1.5 & A1.6].
- 3.15 Representations have been made that the allocation in Hoveton should be split, with some development located on site HV02. The Council does not agree that site HV02 is a suitable site for development. Tunstead Road is a lesser graded road, and the Highway Authority comment that traffic from the site would be likely to use St Peters Lane to the north, which is narrow, has a lack of passing provision, suffers from poor junction alignment, and is not able to cater for additional traffic (summary of Highways comments are contained in the Sustainability Appraisal report [A1.6]). In addition the site is beyond the natural village boundary and the Council considers that development would have an adverse landscape impact.
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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?

- 3.16 The Council has suggested some minor modifications to the submission document to address some of the expressed concerns about air quality, possible future expansion of the medical centre and landscaping around the site (see MM13 - MM17 in document [A1.4]). 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: Hoveton

Site	Is the Site Suitable?	Is the Site Available?	Deliverable / Developable			Current Position
			Dev expected	Major Infrastructure constraints	Agent	
HV03	Well integrated Greenfield site	Yes, as indicated in SHLAA.	Within 5 years	None	Boyer Planning / option agreement with Persimmon Homes	<p>Pre-application discussions held March 2010.</p> <p>Concept masterplan and several evidence reports prepared (see exam library documents I24 to I28)</p> <p>Agent has advised that preliminary discussions have been held with Flagship Housing Association who have agreed in principle to take the affordable units when the site comes forward.</p> <p>Persimmon Homes have carried out viability and market research and have advised that the site is viable and deliverable with immediate effect (SHLAA return).</p>