

**FURTHER PLANNING STATEMENT**  
**PREPARED BY SAVILLS ON BEHALF OF THE HOLKHAM ESTATE**  
**CONCERNING POLICY W01**  
**(MARKET LANE, WELLS NEXT THE SEA)**

**DAY 5 – HEARING DATE 28 JULY 2010**

**1.0 Introduction**

- 1.1 At the Pre-Hearing Meeting held at the Council's offices on the 8 June 2010, the Inspector confirmed that parties are able to submit a short further statement focussed on relevant matters and issues. This should be read in conjunction with our previous submission to the Draft Plan.
- 1.2 Accordingly, Savills on behalf of the Holkham Estate, have taken the opportunity to provide such a statement in order to aid clarification of the issues on Policy W01 which has been the subject of our earlier representations. Specifically we consider that there is an issue with Policy W01 in terms of its boundary which makes it unsuitable having regard to environmental factors (Inspector's Question (xiv) for Days 3-8 and 9).

**2.0 Background**

- 2.1 On behalf of the Holkham Estate, Savills has made a number of representations to the relevant DPD's forming the Council's Local Development Framework. These include representations supporting Wells-next-the-Sea as a focus for new development and its inclusion as a "Secondary Settlement" within Policy SS1 of the Adopted Core Strategy (September 2008).
- 2.2 It is within this context that the Site Specifics DPD has emerged and we have continued to make necessary representations as it has moved through its consultation stages.
- 2.3 Below we provide a brief chronology of events in terms of Holkham Estate's submission to Policy W01.
- Submission was made to the Council's Preferred Options stage in November 2006 supportive of the Council's allocation of all of the site for residential development.
  - The submission was followed up by the preparation of a Deliverability Statement in relation to the site and which was sent to the Council on the 4 June 2008.
  - We then completed and submitted a SHLAA questionnaire confirming the availability, suitability and viability on the site coming forward for development – this was submitted to the Council on the 11 September 2008.
  - Representations were then submitted to the Council on the 11 September 2008.

- Representations were then submitted to the site Specifics Draft Plan in June 2009. These raised a number of matters including our main topic of concern at the forthcoming hearing date which is the deletion of a southern strip of land formally allocated in the Preferred Options Plan – this linear strip of land is identified for affordable housing.

### **3.0 The Southern Boundary of the Allocation at Policy W01**

- 3.1 The representations that we have made relate to our objection to the drawing of a new southern boundary of the allocated site. We consider that it is inappropriate given that there is no physical delimitation on the ground and that the implications of setting this artificial boundary will provide a very real issue in terms of design and layout considerations for any new scheme both within the allocated site or as part of the affordable housing land immediately to the south.
- 3.2 We would make it clear that we fully support the principle of development on the land but that in order to secure its delivery in an appropriate manner we object to the straight line boundary drawn across the site – this leaves about a 40 metre strip of land within which the Council wish to bring forward affordable housing. We calculate this to be approximately 0.8 hectares in extent.
- 3.3 Policy W01 criteria (d) states *“site layout that would enable the land to the south to come forward as an affordable housing ‘exceptions’ scheme.”*
- 3.4 In order to clarify our concerns, Savills Urban Design Team has prepared sketch plans to highlight these issues. Plan 1 identifies the southern boundary of the site allocation and then demonstrates how the narrow width of the ‘residence’ land may well result in a linear form of development. Given the presence of the hedgerow at the edge of the path this may also further constrain the plot width. Plan 2 shows the basis of plot width having regard to highway issues.
- 3.5 Additionally, the shape and size of the linear site could may well mean that plots would need to be backing onto the southern edge which in our view present an uncomfortable edge of built form on the approach to the settlement.
- 3.6 We respectfully suggest that the reversion of the site boundary to that within the Preferred Options document, (i.e. the footpath boundary) would allow for a much more comprehensive opportunity to be taken to develop the whole of the site without being constrained by an artificial boundary which creates a linear site and which is clearly difficult to develop – there is clearly no guarantee that the developer of the allocated site would be the developer of the linear strip. (Plan 3). In addition the development of this strip of land is very unlikely to occur until the development of the allocated site.
- 3.7 We do of course appreciate that there are many ways to design a site but the enclosed sketches show that the removal of the linear strip could allow for increased opportunities for the orientation of dwellings and the delivery of appropriate landscaping measures on this southern edge.

3.8 The Council's own Landscape Character Assessment of North Norfolk at paragraph 4.2.1 (Core Document G24) refers to the sensitive character on the southern edge of the town, a matter which Holkham Estate acknowledges and hence the submission we have made. Indeed, it is interesting to note that the Preferred Options document stated that the Council required a "substantial landscape buffer to the southern and western boundary and suitable tree planting within the public areas of the site". We feel that the change of approach by the Council to advance new residential development in a linear form on the edge of the site does not acknowledge this important issue.

3.9 It is the case that a 0.8 hectare strip of land could accommodate some 20 affordable dwellings setting aside landscape and open space implications. Should the site revert back to within the allocated area it would be subject to the 45% affordable housing provision figure within the Policy. It appears that the latest Plan would provide for some 10 more additional dwellings through the creation of this "rural exceptions" sliver. Whilst appreciating the importance of securing affordable housing, we consider this to be a high price to pay.

#### **4.0 Conclusions**

4.1 Our written representation and this further statement with enclosures raises concerns about the design and layout implications of artificially creating a linear site for new development on the southern edge to the site at Policy W01.

4.2 It is our view that such concerns would be addressed by the deletion of the southern boundary and its re-instatement to the edge of the footpath to the south (as indicated in the Preferred Options document). This will serve to extend the size of the allocation and provide further affordable housing having regard to the policies.

4.3 Whilst there is a gain in terms of potential affordable housing numbers created by a "exceptions" site, we do not support the manner in which this is to be secured – ie. creating an artificial division on the ground in the southern part of the field.

4.4 We do not consider the plan to be effective given the implications that the development on the linear strip would have on the character of the site and its surroundings. In such a context we consider that this southern boundary as it is presently shown in the submitted plan is unsuitable and should be amended to coincide with the footpath to the south.

4.5 We therefore consider the plan to be lacking a clear mechanism for implementation and not the most appropriate having considered the most appropriate alternatives (PPS 2)