



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

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 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 requested in Stalham.
- 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. Key Changes are requested in Stalham (KC09-KC11) **[A1.3]** which if accepted by the Inspector would result in the allocation of employment land in Stepping Stone Lane and a more restrictive approach to the type of employment that would be required on proposed allocation ST01.

2. Context for allocations in Stalham

- 2.1 The introductory text to the Stalham section of the Draft Plan **[A1.1]** sets out the strategic context within which the proposed allocations are made. Stalham is identified in the Core Strategy as a Secondary Settlement, recognising its role as a gateway to the Norfolk Broads and a local retail and service centre. Stalham does not have the same range of facilities and services as some of the other towns in the district and there are comparatively few local employment opportunities resulting in high levels of commuting. For these reasons the Core Strategy allows for a modest amount of new residential development, 150-200 dwellings on newly identified sites well related to the built up area, along with 3.5 hectares of new employment opportunities.

2.2 Two sites are proposed for development, an employment allocation to the north west of the town, E12 (**KC09** in document **[A1.3]**) and a mixed allocation to the east of the town centre (**[A1.1]** and **KC10 & 11** in document **[A1.3]**). The Council is proposing greenfield options that:

- Are visually self contained and minimise impacts of the landscape;
- Are well related to the strategic highway network including the A149 ;
- Are able to deliver new employment opportunities along side the construction of new housing;
- Are able to address a broader range of issues in terms of providing for appropriately located public open space and community facilities.
- Will deliver housing in a highly sustainable location with excellent access (mostly on foot) to a broad range of facilities and services.

3. Response to Inspector's specific questions

ix) Are the individual housing allocations available, suitable, and achievable (i.e. "deliverable" or "developable"), in the terms of PPS 3?

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 **[F.4i]** and the Strategy Housing Land Assessment (SHLAA) **[F.4ii]** indicate which sites the Council expects to deliver housing within the next 5 years, and this is summarised in the tables attached to the Council's response papers.

- **Available:** ST01 - The landowner of the site has indicated support for development and 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.
- **Achievable:** Agents are promoting ST01 and advice of interest in the site from housebuilders. The site is expected to come forward in the period 5 -10 years. Further information /evidence is contained in the Draft Plan, SHLAA, housing trajectory, 5 year land supply reports **[F4i & F4ii]** and the attached table.
- **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 ST01 and it is

in a suitable location for housing development – being well related to existing development and close to the town centre, local schools and health services. Further details are contained in the Draft Plan and in response to the questions below.

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 As a Key Change the Council has identified a ‘New Employment Allocation’ on Land South of Weavers Way (E12) (**KC09** in document **[A1.3]**) and a mixed use allocation incorporating low key employment opportunities on Land Adjacent to Church Farm, Ingham Road (ST01) (**[A1.1]** and **KC10 & 11** in document **[A1.3]**).
- 3.4 The appropriateness of these allocations has been tested through a process of Sustainability Appraisal, Appropriate Assessment and stakeholder and public participation and the Council considers that the proposed allocations are appropriate. Results of these processes are available in the examination library documents **[A1.3 A1.5, A1.6, A1.7 & A1.8]**.
- 3.5 The two employment sites proposed in Stalham offer greenfield development opportunities for a broad range of economic uses. The allocations are consistent with Core Strategy Policy SS13 which requires the identification of land for employment generating uses in locations with good access to the A149. Inclusion of these allocations supports PPS4 objectives of providing for sustainable economic growth and will assist in improving the economic performance and self containment of the town.
- 3.6 The greenfield allocation on land South of Weavers Way (E12) is included to provide for industrial estate type development in a location where associated heavy goods vehicles have easy access to the A149, minimising cross town traffic movements. In contrast the site on Ingham Road (ST01), where 160 dwellings are proposed and where traffic will use cross towns routes, compatible ‘low key’ employment generating uses are proposed e.g. business, public and community uses. The two sites collectively provide for a broad range of employment generating uses consistent with PPS4.
- 3.7 The landowner of E12 has indicated that the site would be immediately available on allocation. The Council is aware of existing demand for greenfield employment sites having recently dealt with an enquiry from an established local business seeking to relocate and expand operations within the town.
- 3.8 In relation to ST01 the proposed policy requires prior approval of a development brief which will provide for the phased delivery of new employment opportunities along side the construction of new housing.

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

- 3.9 The Sustainability Appraisal (SA) 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]**.

- 3.10 Site ST01 offers a highly sustainable location for new development. It is well located for local employment and within convenient walking distance of the town centre, local schools, community facilities and health services. In addition the site is well placed relative to existing bus stops offering access further afield.
- 3.11 Site E12 is considered a sustainable location for employment development. Access to the site by pedestrians and cyclists is good particularly given the close proximity of the Weavers Way footpath. Impact on the landscape would be mitigated by the provision of comprehensive planting along site boundaries.

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?

- 3.12 The evidence indicates that the sites are not subject to any overriding infrastructure constraints that cannot be overcome:
- 3.13 **Water / Sewage / Drainage:** Work associated with the Water Infrastructure Statement [A1.11] found that the full extent of the proposed development growth at Stalham can be accommodated within the existing volumetric consent at the Waste Water Treatment Works. See Appendix 1 of the Water Infrastructure Statement for details. In addition development growth is not currently constrained by the requirements of the Water Framework Directive or Habitat Directive although this may change in the future, particularly in relation to the consent limit for phosphorous. Requested modifications (MM74) is intended to highlight this issue.
- 3.14 **Electricity Supply:** EDF Energy has indicated that in Stalham there is currently sufficient network capacity to meet the needs of the scale of residential development proposed. EDF Energy have indicated that commercial and industrial proposals would be considered on a case by case basis informed by the precise nature of the uses and loading characteristics.
- 3.15 **Education:** It is anticipated that pupils from the housing proposed could be accommodated within existing provision, however limited expansion and adaptation could be required at the High School and Infants School.
- 3.16 **Highways:** The Highway Authority has no objection to either of the allocations (see Sustainability Appraisal results sheet in SA Report Part 2 [A1.6].
- 3.17 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

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

- 3.18 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:

Land adjacent to Church Farm, Ingham Road (ST01)

- 3.19 **Impact of development on foul and surface water disposal and water quality:** As referred to in response to Q. xiii the Waste Water treatment works at Stalham has sufficient capacity to accommodate the scale of development proposed. In addition development growth in Stalham is not currently constrained by the water quality requirements of the Water Framework Directive of Habitat Directive although this may change in the future, particularly in relation to the consent limit for phosphorous.
- 3.20 In relation to the foul sewage network serving the town, Anglian Water advice that there is limited spare capacity. It may be necessary for network improvements to be carried out before the scale of development proposed can come forward. Requested modifications (**MM74j and I**) are intended to highlight this issue.
- 3.21 **Transport impact:** ST01 is the preferred site of the Highway Authority given its close proximity to a broad range of services and the potential the location offers future occupiers to access these by means other than by motor car.
- 3.22 The development of the site would require at least two separate points of vehicular access (one each to Ingham and Yarmouth Road). This is not currently reflected in the policy requirements and the Inspector is referred to KC11 [A1.3] which provides this clarification.

Land South of Weavers Way, Stalham (E12) KC09

- 3.23 **Landscape impact of development:** Para. 3.16 of the Key Change document identifies landscape as a constraint requiring careful consideration. Reference is made to the prominence of the site and to the need for comprehensive landscaping around site boundaries, particularly along the A148 where a landscape belt not less than 20m is specified as a requirement. A large site is identified in order to facilitate this landscaping. Structural planting will be an integral part of the development of this site and a suitable landscape mitigation scheme will be agreed at planning application stage.
- 3.24 **Suitability of site for employment development:** The site has two road frontages and consistent with Policy SS13 of the Core Strategy [G14] offers easy access via Stepping Stone Lane to the A149. The location allows associated traffic to by-pass the built up area of Stalham and for the countryside setting of the northern part of the town to be maintained. Although the site does not directly adjoin the development boundary of Stalham, the Weavers Way footpath provides the potential for good access to the town centre and the site is well related to bus services. The draft policy requires the upgrading of the Weavers Way footpath for combined use as a combined pedestrian and cycleway, and provision of a direct connection to the site.
- 3.25 The allocation results in employment generating development in the vicinity of residential properties on Stepping Stone Lane and on the southern side of the A149. The development will be subject to comprehensive landscape requirements and will need to comply with Policy EN13 of the Core Strategy relating to Pollution and Hazard Prevention and Minimisation. This Core Strategy policy requires development proposals to minimise all emissions and other forms of pollution, including light and noise.

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”?

- 3.26 The Council has appraised a range of alternative sites in Stalham and considers that the allocations 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 SA report **[A1.5 & A1.6]**.
- 3.27 At Reg. 27 consultation stage Stalham Town Council and a large number of residents submitted representations promoting ST16 as a preferable site to ST01 for the scale and mix of development being proposed for the town. Representations suggest that the location of the ST16 offers a number of advantages over ST01 including: better vehicular access arrangements; closer proximity to the sewage treatment works facilitating easier connection; and opportunity to enhance existing recreational facilities to the north west of the town. The site has been subject to Sustainability Appraisal and scored poorly compared to ST01 largely a result of its comparative distance from the town centre/key services and because of its landscape impact. During the plan making process this site has not been promoted for development by the landowner, and at meetings with Council Officers they have indicated that the site is not available.
- 3.28 ST01 is well related to the services and facilities within the town being only a short distance from the town centre and local schools (Children’s Centre, infant, primary and high schools all within 500m) This is reflected in the SA score, the site scoring 12 - the second highest of all sites appraised and the highest scoring allocation in the Draft Plan. ST01 compared to ST16 represents a more sustainable location for the scale of development proposed and offers the opportunity to provide recreational facilities in a part of the site currently not well served, as referred to in para. 10.0.4 of the Draft Plan.
- 3.29 The Council considers ST01 is available and preferable to ST16 for the scale of development proposed in the town.

xvii) Is any “unsoundness” in the allocations and proposals overcome by the Council’s schedules of Key Changes and Minor Modifications?

- 3.30 The Council has suggested some minor modifications and Key Changes to the submission document to address some of the expressed concerns about individual allocations (see **MM18- MM27** in document **A1.4** and **KC09 - KC11** in document **A1.3**). The Council considers that the Site Specific Proposals document is sound as submitted, and that the minor/Key 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: Stalham

Site	Is the Site Suitable?	Is the Site Available?	Deliverable / Developable			Current Position
			Dev expected?	Major Infrastructure Constraints?	Agent?	
ST01	This is a well integrated greenfield site closely related to town centre and facilities.	Yes, as indicated in the SHLAA	Expected to deliver in the period 5 – 10 years	Subject to investigations the capacity of the foul sewage network serving the town may need to be improved. See response to Q xiv	Savills	Agents advise of interest in the site from house builders.
ST16	Greenfield site close to Stalham. Weavers Way footpath provides the potential for good access to the town centre and the site is well related to bus services	Yes.	Within 10 Years	None	N/A	No update.