

**Examination of the North Norfolk District Council Site Specific Proposals DPD  
Submission Statement**

**Day 6: North Walsham, Stalham, and Hoveton**

Prepared and coordinated by  
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## **Introduction**

1. This submission statement has been prepared on behalf of Taylor Wimpey Developments, who have an option agreement on land to the west of Yarmouth Road, North Walsham.

## **Inspector's Questions**

2. The following questions are posed under the Inspector's 'Days 3-8, and 9' heading:
  - i) 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?
  - ii) (With reference to Sustainability Appraisal) Are the allocations "sustainable"?
  - iii) 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?
  - iv) Are any of the allocations unsuitable by reason of any environmental or residential amenity issues/objections?
  - v) 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"?

## **Policy Context**

3. The East of England Plan was published in May 2008. Policy H1 identifies that North Norfolk will provide a minimum of 8,000 dwellings from 2001 to 2021.
4. The North Norfolk Core Strategy was adopted in September 2008. It confirms at paragraph 1.2.7 that the Core Strategy has been prepared in the context of the East of England Plan. Policy SS1 of the Core Strategy identifies North Walsham as a Principal Settlement where the majority of new commercial and residential development will take place within the District. Policy SS10 identifies between 2001-2021 a total of between

900 and 1,100 dwellings will be built at the town. This will include 400-550 dwellings on newly identified development sites well related to the built up area.

### **Housing Land Supply**

5. Planning Policy Statement (PPS) 3 is explicit in its guidance on the matter of housing land supply. One of the main aims of the PPS is to secure a step change in the delivery of new housing through a more responsive approach to land supply at the local level. Some urgency is attached to this step change since paragraph 7 states as follows:

*“On publication of this PPS, Local Planning Authorities will need to assess and demonstrate the extent to which existing plans already fulfil the requirement set out in this statement to identify and maintain a rolling five-year supply of deliverable land for housing, particularly in connection with making planning decisions.”*

6. Paragraph 4.3.3 of the North Norfolk Core Strategy (September, 2008) states *“PPS3 requires that Local Authorities should ensure that at any point in time there are sufficient available, suitable and achievable housing sites for the next five years. Local Authorities should not rely on ‘windfall’ development to make up this five year land supply unless it is clear that such development is achievable. In North Norfolk a five year supply equates to approximately 2,000 dwellings. Windfall sites which have planning permission can comprise part of a five year supply. In March of 2007 there were 473 dwellings recorded as under construction in the District and the Council had granted planning permission for a further 1,193. Allowing for a 10% lapse rate in permissions, these ‘commitments’ represent a 3.8 year supply of dwellings, not accounting for additional completions that will take place in the next five years. It is anticipated that residential land allocations will be made in 2009 when the Site Specific Proposal Document is programmed for adoption.”* It should be noted that the Site Specific Proposals DPD is now expected to be adopted by the Council in January 2011. The Council’s position in respect of housing land supply is updated in the North Norfolk District Council Annual Monitoring Report 2008-2009 (December, 2009), which identifies that the Council can now demonstrate 4.19 years supply of housing land.

### **Currently Identified Allocations – North Walsham**

7. In response to Policy SS10 of the Core Strategy the Site Specific Proposals DPD proposes the following draft allocations:

1. Norwich Road (400 dwellings) (NW01, 04-07& 30);
2. Land off Laundry Loke (10 dwellings) (NW25);
3. North Walsham Football Club (60-80 dwellings) (NW28a); and
4. Paston College (30-60 dwellings) (NW44).

#### *Land at Norwich Road (NW01, 04-07& 30)*

8. As identified in the Site Specific Proposals DPD, land at Norwich Road/Nursery Drive (NW01, 04-07& 30) is a large mixed use allocation in several ownerships that will need to be delivered in phases. It is understood that a formal phasing obligation will be required. This is likely to cause complications for the development of this site as there is no guarantee that all landowners will agree to the phasing obligation or relationships will remain strong through the period of time required to deliver this development. It is therefore considered that these proposals cannot guarantee the early delivery of housing at North Walsham or in the District.

9. It is therefore considered that Policy NW01, 04-07&30 would not be effective in contributing to the early delivery of housing.

#### *Land off Laundry Loke (NW25)*

10. This is a small mixed use allocation on a brownfield site that will not contribute significantly to housing provision within the District (10 dwellings). However, it is understood that the proposed allocation is in dual ownership, which could cause complications for the development of this site as there is no guarantee that relationships with landowners will remain strong through the period of time required to deliver this development.

11. The Council has identified that, due to the site being brownfield land, to be in line with PPS23 a study will be required to identify previous site uses and potential contaminants that might be expected in order to fully assess any risks posed. The Site Specific Proposals DPD states *“if the desktop study identifies that contamination may be a problem then a full site investigation should be completed and an appropriate remediation scheme developed.”* It is our understanding that even the most comprehensive study and site investigation cannot be guaranteed to find all pockets of soil contamination. We also understand that some land contamination can take a long time to remediate or due to a combination of economic and environmental factors the land cannot be rendered suitable for redevelopment. The timescales and costs for obtaining planning and/or other consents can make developments unachievable.
12. It is therefore considered that Policy NW25 would not be effective in contributing to the early delivery of housing.

*North Walsham Football Club (NW28a)*

13. It is understood that North Walsham Football Club have used this site for several years and residential development will facilitate relocation of the football club. It is also understood that development of the site will be dependent on relocation of the football club to suitable alternative premises, which have not yet been found. The need to relocate the football club and the associated recreation land could cause complications for the development of this site.
14. From our recent discussion with the Council, it is understood that the site has not attracted any developer interest. The identification of the Council’s intention to make the town of North Walsham a main focus for development in this review of the Local Development Framework was made known to the public in the Development Strategy Topic Paper (2005). North Walsham as a preferred location for development has therefore been in the pipeline for some time now. Add to this the site’s inclusion in the Site Specific Proposals Preferred Options paper in 2006, as one of only three ‘proposed residential sites’ in North Walsham, it is clear the site is not favoured by

developers. This being the case, it is apparent the site is not deliverable in the short term, and due to the notable lack of developer interest, quite probably the longer term as well. It is noted from the Sustainability Appraisal that Norfolk County Council (NCC) Highways have serious concerns over the ability to deliver improvements to the local transport network for development at the football club (NW28a) and they consider that it may not be possible to provide necessary walking/cycling facilities to the town centre, as it would require extensive land acquisition from numerous landowners to address these problems. The Sustainability Appraisal also notes that NCC Highways consider that additional traffic on surrounding narrow highways would create an unacceptable increase in danger to pedestrians. This casts further doubt over the deliverability of this site.

15. These proposals are therefore unlikely to be achievable within the plan period. The proposed allocation is therefore unsound as it is not consistent with national policy.

*Paston College Lawns Site (NW44)*

16. This site contains a listed building and part of the site is within the North Walsham Conservation Area. In light of these constraints the proposed maximum number of houses at the site (up to 60 dwellings) is considered to be inconsistent with PPS5, which aims to preserve the setting of designated heritage assets.

**Proposed Alternative Allocation**

17. The Council's strategy for North Walsham within the Site Specific Proposals DPD is to direct the housing requirements at North Walsham to previously-developed land within the boundary of the town. To rely on such a strategy where many of the proposed allocations are in multiple ownerships could lead to delays in the delivery of housing at this Principal Settlement within the District.
18. Land west of Yarmouth Road (NW24) comprises approximately 3.5 hectares of arable land. It is bordered to the north by residential development at Ellinor Road and Legrice Crescent. To the east of the site the boundary is formed by Yarmouth Road. The

southern site perimeter comprises reasonably dense mature vegetation, the other side of which is situated two large plots (Offlands and Mushroom Farm). The western boundary is a grassy bank, beyond which is a thin strip of land and the A149.

19. In the adopted Core Strategy, land west of Yarmouth Road, is classified as countryside, but adjacent to the Settlement Envelope. The geographical location for this site is therefore edge of town. It is considered that this site is well related to the built up area and would therefore accord with Policy SS10 of the Core Strategy.
20. The site is greenfield land currently in agricultural use, but features no built development. It is situated on the edge of North Walsham, but in close proximity to existing services and facilities, open space, existing housing and the countryside. No important facilities are distant or inaccessible by foot or cycle from the site.
21. Preliminary investigations of this site have not yielded any constraints to development insofar as landscape, townscape, drainage and flood risk or archaeology is concerned.
22. A Phase 1 Habitat Survey was completed in May 2010 by James Blake Associates. This identifies that the site is an arable field with rough grass margins and hedges with mature standards. No protected, BAP or rare plants or habitats were found on the site. However, the habitats found at the site were considered to have the potential to support protected, bat, reptile and bird species. The report therefore recommends that further surveys are undertaken to establish if reptiles are using the site, as well as, to establish if any trees proposed for removal are used as roosts, and if bats are using the site for foraging or commuting. It also recommends that site clearance should take place outside the bird nesting period.
23. A Transportation Feasibility Report was completed by MLM Transportation in May 2010. This provides a review of local bus and train services, access to nearby educational and community facilities, which concludes that the site is well placed. There are therefore no locational constraints in transportation terms and its location accords with sustainable objectives.

24. The report also provides a review of the means of access to serve the site and demonstrates that an access can be provided to the site which accords with the Norfolk County Council design guide. An emergency access can also be provided that meets with development control design standards.
25. The report provides an assessment of the likely traffic generation from the site, which concludes that the impact of the development is likely to be very low.
26. The overall conclusions of the report are that a satisfactory vehicular access can be provided on the outside of a bend or within close proximity of this location and that an appropriate geometrical design can be provided, the development is considered to be in a sustainable location in that it is only a few hundred metres from a bus stop that primarily serves a residential development off Legrice Crescent. Finally, Census data which includes car ownership and modes of travel to work confirms that the area is more sustainable in comparison to many similar areas in Norfolk.
27. Land west of Yarmouth Road is identified as site NW24 in the Sustainability Appraisal for the Site Specific Proposals DPD. The Sustainability Score for land west of Yarmouth Road, as stated in the Sustainability Appraisal, is 9. The sustainability score of this site therefore exceeds the score achieved by each of the proposed draft allocations at Laundry Loke (NW25) and the North Walsham Football Club (NW28a). It is therefore considered that these proposed allocations are unsound as they are not justified when compared to the evidence base.
28. As discussed in paragraph 3 above, the housing targets for the District are minima to be achieved. It is therefore considered that the maximum allocation of 550 dwellings, as identified in the Core Strategy, should be provided at North Walsham. If the proposed allocations at Laundry Loke (NW25) and the North Walsham Football Club (NW28a) are removed from the Site Specific Proposals DPD and the Paston College (NW44) allocation provides the minimum amount of dwellings proposed, this leaves a deficit of approximately 120 dwellings to be provided at the town. Land west of Yarmouth Road is of an appropriate size to accommodate this number of new dwellings at the town to ensure targets are achieved.

## Conclusion

29. This submission statement has been prepared by DLP Planning on behalf of Taylor Wimpey Developments and has demonstrated that the proposed allocations at Laundry Loke (NW25) (10 dwellings) and North Walsham Football Club (NW28a) (80 dwellings) are not justified or consistent with national planning policy, they should therefore be deallocated for housing development and the proposed quantum of housing at these sites should be directed to land west of Yarmouth Road (NW24) to make the Site Specific Proposals DPD sound. The proposed maximum number of dwellings at the Paston College (NW44) site is also not justified due to the presence of the listed building and the conservation area. The minimum allocation of 30 dwellings should be provided at this site and the remaining number of dwellings (30) should be directed to the land west of Yarmouth Road, to aid the achievement of housing targets.
30. Land west of Yarmouth Road adjoins the present built up area of the town and it is in a sustainable location to provide housing development to meet the future housing needs of North Walsham. There are no identified environmental constraints to the development of the site. The development of this site would be developer-led. The release of this site would contribute to the early delivery of housing growth at a Principal Settlement within the District, and to maintaining a rolling five year housing land supply in the short to medium term and should therefore be allocated for housing to make the Site Specific Proposals DPD sound.



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