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North Norfolk District Council's Response to Inspector's Matters and Issues: Questions (ix) - (xvii) in relation to Villages West of Cromer

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 but 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 for allocations in the villages.
- 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. There are several Key Changes requested in villages west of Cromer.

2. Context for allocations in the Villages

- 2.1 The Core Strategy [G10] identifies 16 Service Villages across the district. These are listed in Policy SS1 and indicated on the Key Diagram. This paper responds to the Inspector's Matters and Issues for villages west of Cromer (**Aldborough, Blakeney, Briston / Melton Constable, Corpusty / Saxthorpe, Little Snoring, Walsingham and Weybourne**).
- 2.2 Core Strategy Policy SS3 indicates that allocations in the Service Villages will be for a maximum of 26 dwellings, except for at Briston / Melton Constable and Mundesley where allocations for up to 50 dwellings will be considered. This recognises their size and their role as a service centre for a larger area. The introductory text to each village's section in the Draft Plan [A1.1] sets out the characteristics of that village within which the proposed allocations are made. Some of the villages have a large number of potential sites whilst in others the choice is limited by availability or

suitability factors. There is little scope for further development or redevelopment in many village locations and consequently the selected sites invariably lie on the edges of settlements. In each location the Council has considered a range of options and has compared the merits of different sites. The sites identified are considered to be the best available taking account of a broad range of factors.

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 Draft Plan are available and suitable. 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 [F4ii] and the Strategic Housing Land Availability (SHLAA) [F4i] indicate which sites the Council expects to deliver housing within the next 5 years. The attached table sets out when each of the allocations in the villages is expected to come forwards and also summarises the Council's assessment of Availability, Achievability and Suitability for each of the sites. The overall appraisal for the villages can be summarised as follows:

- **Available:** Landowners of all residential sites have indicated support for development and sites are generally all immediately available.
 - **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 allocations represent the most suitable sites for allocation. There are no major constraints facing the sites and they are generally well related to village facilities. Further details are contained in the Draft Plan.
 - **Achievable:** A number of the village allocations are being promoted by agents and, while specific house builders are not necessarily known, there is an expectation that development on some of the sites could come forwards in the next 5 years. However the Housing Trajectory [F4ii] reflects the fact that most of these sites remain in private ownership and early commencement is generally assessed as unlikely.
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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 being proposed in the villages. A number of the sites include provision of public open space and this is expected to be delivered alongside the allocation.
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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 favour 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 Sustainability Appraisal report [A1.6].
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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?

- 3.5 The evidence indicates that allocations in the villages are not subject to any overriding infrastructure constraints that cannot be overcome:
- 3.6 **Water / Sewage / Drainage:** Work associated with the Water Infrastructure Statement [A1.11] found that the levels of growth proposed in the villages can be accommodated within the existing volumetric consent at the relevant WwTWs. See paragraph 4.6 of the Water Infrastructure Statement for details.
- 3.7 **Education:** The Education Authority have confirmed that pupils generated from the levels of housing proposed in the villages could be accommodated within existing school provision (see paragraph 14.0.24 of Draft Plan [A1.1]).
- 3.8 **Highways:** The Highway Authority has no objection to the allocations in the Service Villages west of Cromer (see results sheets in Sustainability Appraisal Report Part 2 [A1.6]).
- 3.9 The Constraints Section of the Draft Plan highlights specific constraints that were identified through the site investigation process and these can be addressed through the normal planning process.
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xiv) Are any of the allocations unsuitable by reason of any environmental or residential amenity issues/objections?

- 3.10 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]). These are discussed by settlement below, and the Council is satisfied that these have, or can be, overcome:

ALDBOROUGH

- 3.11 **Scale and form of development:** The allocation in the Draft Plan is for approximately 10 dwellings and serviced commercial premises. The Parish Council comment that they support new housing, but only in small groups, and that the 10 houses, in addition to other properties in the area, is well in excess of a small group. The Council has taken account of the Parish Council views and paragraph 12.1.5 of the Draft Plan states that the site could be developed in two clusters with an open landscaped area in the middle. This reflects the comments in the Conservation Area Appraisal and the Parish Council preference for small groups. The representations received to the Draft Plan were considered by the LDF Working Party in October 2009 [I2] where it was agreed to reduce the allocation to 6-8 dwellings and amend the site area to remove the meadow land in front of Pipit's Meadow properties but retain a strip between ALD01 and ALD07 for access. This was consulted upon through the Schedule of Key Changes [A1.3] in January 2010 (KC01 and KC02). Five representations were received (see Representation Report [A1.20]) commenting that any development site should be limited to 5 or 6 dwellings and raising concerns about access.
- 3.12 The Highway Authority previously commented that they would object to increased vehicle access from Pipit's Meadow because of substandard visibility at the junction with Thurgarton Road. The allocation includes the garage site which enables junction improvements to be made which can provide safe access to the wider site. The Landowner of ALD01 has a right of access over Pipit's Meadow and the strip of land of approximately 4 metres wide between ALD01 and ALD07 is retained to allow for improvements or alterations to the single track access road serving four existing properties if necessary. This does not need to be adopted as it will serve a very limited number of properties and there are no minimum width standards for un-adopted roads. The details can be determined through a planning application. There is a reasonable expectation that safe access can be delivered as Highways have no objection to the allocation or the key change.
- 3.13 **Preference of alternative sites:** The Parish Council support development of a number of alternative sites - ALD29, ALD26, ALD22, ALD09/11/12 and ALD01/16 (the allocated site). These sites have been considered, as evidenced by the Sustainability Appraisal report [A1.5 & A1.6]. The non-allocated sites are generally removed from the main body of the village (indicated by the boundary), are further from main village facilities, have poor highway access or an unacceptable landscape impact. The allocated site is, by contrast, well-related to the village and can be accessed by Thurgarton Road which can provide safe and convenient access.

BLAKENEY

- 3.14 **Local housing need:** There is longstanding view of the Parish Council that further market housing in Blakeney is likely to be occupied as second/holiday homes and as the affordable housing will not be subject to local lettings restrictions it will fail to address locally derived housing need.
- 3.15 The Core Strategy establishes the principle that small scale housing allocations can be made in the selected settlements and that these should comprise a mix of market and affordable dwellings. This is intended to meet both the demand and need for housing across the district, not just in the particular settlement. The affordable elements of

these proposals are not intended to exclusively meet 'local' needs and will not be subject to local lettings restrictions. They are intended to increase the overall supply of affordable housing in the district and are *additional* to the supply that might be provided via rural exceptions proposals. Local needs can continue to be met through Rural Exception proposals.

- 3.16 The Development Strategy was prepared on the basis that there is a significant need for affordable housing in the District as a whole. Given the large scale of need identified, and the limited opportunities which are likely to be available to address it, it is considered difficult to justify limiting occupancy to local people other than on rural exception sites. Arguably those in highest need should be given priority irrespective of where they live in the district. Local letting restrictions, whilst giving priority to local people also restrict access by others. The inequalities in this situation would not arise if affordable housing was to be made available in every settlement to meet every identified need but, unfortunately, this will not be the case. A flexible approach to dwelling allocations is therefore necessary to ensure that all those in need in the district have an equal opportunity to access the limited affordable housing that will be available.
- 3.17 **Impact on Norfolk Coast Area of Outstanding Natural Beauty (AONB):** All land within and adjacent to Blakeney lies within the Area of Outstanding Natural Beauty although different sites will result in varying degrees of impact. In common with many villages Blakeney lacks any significant brownfield redevelopment opportunities and where these do arise development would accord with adopted policies. The Draft Plan refers to the sites prominent location and the need for careful design to minimise visual impact. This, along with the minor modification (**MM69** in document [**A1.4**]) suggested by Natural England should ensure a sensitive well designed development that respects the area.
- 3.18 **Availability of preferable site:** A representation promoted BLA07 as a preferable site. BLA07 comprises part of an area which is designated as an Open Land Area on the adopted Proposals Map [**G12**]. Whilst it is within the AONB it is surrounded by existing buildings and consequently development would avoid any encroachment into the wider countryside setting of the village. However its designation as part of an Open Land Area reflects its positive contribution to the character of Blakeney, as part of a bigger green space. Development would clearly, in part, compromise this.

BRISTON / MELTON CONSTABLE

BRI02: Land West of Astley Primary School

- 3.19 **Transportation Impact:** The proposed allocation lies close to Astley Primary School and the highway network in this locality becomes heavily parked and congested and school dropping off and pick up times. The proposed policy attached to the allocation recognises this and requires the approval of a scheme to remove parked cars from the carriageway. This might be achieved in a number of ways and the policy is deliberately flexible to allow for a number of options to be considered. There is no highway authority objection to the proposal. Precise vehicular access arrangements will be determined at planning application stage when a number of options might be considered including possible linkage of the site to a redevelopment of the adjacent social housing development.



BRI24: Land at Rear of Holly House

- 3.20 **Scale and form of development:** The scale and form of development proposed on the site will be a matter to determine at planning application stage but there is no reason to conclude that this will not be entirely consistent with the prevailing character of the area.
- 3.21 **Transportation impact of development:** The road network adjacent to the site is suitable to meet the needs of the proposed development and there is no highway authority objection to the development.

BRI27: Land at Church Street

- 3.22 **Impact on amenities of existing residents:** Issues in relation to residential amenity will be addressed at planning application stage. Given the number of dwellings proposed on this site the Council is satisfied that the development can be accommodated in a way which ensures amenity levels do not fall below acceptable standards. However, it is considered appropriate to highlight the need for the form and layout of any development to have regard to the single storey nature of existing properties adjacent to the site. The Inspector is referred to minor modification MM45 [A1.4].

CORPUSTY / SAXTHORPE

COR01: Land between Norwich Road and Adams Lane

- 3.23 **Scale and extent of development:** The suggested size of this allocation was increased prior to Reg. 27 consultation to provide for a small increase in dwellings (originally 12 dwellings, increased to 18 dwellings) to provide scope for a greater number of affordable houses and an area of open space. The scale of proposed development accords with the Core Strategy. The dwelling numbers specified in the policy are approximate and detailed proposals will need to demonstrate that they comply with adopted policies in relation to protecting character and biodiversity interests.
- 3.24 **Biodiversity value of the site:** The inclusion of open space within the site as proposed, a relatively low density, and policy requirements in both the Draft Plan and the adopted Core Strategy are sufficient to ensure the protection of biodiversity/appropriate mitigation
- 3.25 **Proximity to the sewage treatment works:** PPS23 states '*Where, for example, new housing is proposed close to a source of potential pollution, the risk of pollution from the normal operation of the process or the potential impacts and the extent to which the proposals address such risks will influence whether or not development should proceed*'. The risk of pollution in this instance is regarded as slight given that the site, even as enlarged, is towards the outer edge of the 400 metre zone, pollution incidence under normal operating conditions can be reasonable expected to be infrequent, and such incidence would not comprise a risk to health.
- 3.26 **Transportation impact of development:** The policy requirements specify that safe vehicular access should be provided to Norwich Road. Adams Lane is unsuitable for additional vehicular use but as drafted the policy does not make it clear that no

vehicular access will be allowed to Adams Lane. The Inspector is referred to minor modification MM46 [A1.4].

LITTLE SNORING

SN01: Land at junction of Holt Road & Kettlestone Road

- 3.27 **Transportation impact of development:** The Highway Authority raise no objection to development on this land subject to improvement of the Kettlestone Road /A148 junction. The Inspector is referred to minor modification MM53 [A1.4] which requires land to be retained for possible future junction improvements.
- 3.28 **Scale of development:** In response to representations received at Reg. 27 stage the scale of development proposed on this site has been reduced to 15 - 20 dwellings (KC05 in document [A1.3]). The precise number will be determined at planning application stage - The site is considered of sufficient size to provide for this scale of development in a manner that would protect or enhance the character of the village.
- 3.29 **Impact of development on the wildlife value of the site:** An initial wildlife investigation [I1] undertaken by North Norfolk Wildlife Services has identified the need for further survey work to assess the possible presence of protected species. This is referred to in the supporting text and in the policy requirements (b). Core Strategy Policy EN9 requires that all development proposals protect the biodiversity value of land and maximise opportunities for enhancement. Development on this site would need to demonstrate that suitable conservation features/mitigation measures have been considered and incorporated to satisfy the requirements of EN9. The reduction in the scale of development proposed on this site (KC05) provides the scope for biodiversity matters to be adequately addressed.

SN05: Land adjacent to Little Snoring Primary School, Kettlestone Road (KC04)

- 3.30 **Loss of open space:** The policy for this site recognises the openness of the site and requires open space to be retained adjacent to the primary school to act both as an amenity area and a green link between countryside to the north and south of the site. It is considered that the scale of development proposed can be provided in a manner that enhances this central part of the village.
- 3.31 **Vehicular access to the site:** The Highway Authority have confirmed that works are likely to be required to Kettlestone Road to improve visibility and that the details of access arrangements will be established at planning application stage.
- 3.32 **Availability of preferable site:** A number of representations promote SN07 as a preferable site. SN07 (including SN02) site has been subject to Sustainability Appraisal and consulted on at Regulation 25 Stage as a site having been considered but not preferred. In terms of Sustainability Appraisal, SN07 scores the highest of all the sites considered in the village for residential development. The site is green field and has no road frontage, being backed on to by the school and by properties on Stevens Road, The Pastures and Manor Close. The site is approximately 3.5 ha in area and much larger than is required to provide for the scale of growth identified for the village. If developed entirely for housing this site could accommodate 90-100 dwellings. However, the owners are suggesting a mixed use development of the site that would accommodate dwellings, substantial areas of new tree planting, school



playing field extension and a school car park. Development of this site would intrude into the countryside although the inclusion of significant areas of new tree planting would mitigate this impact.

- 3.33 The Council consider SN01 and SN05 to be preferable and are both supported by the Parish Council
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WALSINGHAM

- 3.34 No main issues raised. The Council considers the allocation is sound.
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WEYBOURNE

WEY03: Land at the Street, opposite the Maltings Hotel

- 3.35 No main issues raised. The Council considers the allocation is sound.

WEY09: Land South of Beck Close

- 3.36 **Visual impact on the AONB:** Key Change 13 [A1.3] responds to concerns raised at Reg. 27 stage to the impact of development on the Norfolk Coast Area of Outstanding Natural Beauty. The change to the Draft Plan reduces the number of dwellings proposed and the extent of encroachment into the AONB.
- 3.37 **Transportation impact of development:** There is no objection from the Highway Authority to the allocation. KC13 [A1.3] reduces the scale of development and potential traffic generation.
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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”?

- 3.38 The Council has appraised a range of alternative sites in the villages and considers that the allocation sites are the most suitable and that the plan is sound. Other sites were discounted for a number of reasons such as location, poor highways access, unacceptable flood risk or visual impact. Evidence of the appraisal of alternative sites is contained in the SA report [A1.5 & A1.6]. Where alternative sites have been promoted these have been discussed in the previous section.
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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?

- 3.39 The Council has suggested some minor modifications to the submission document as well as key changes in Aldborough, Little Snoring, Briston and Weybourne to provide clarification and address some of the concerns expressed about the village allocations (see [A1.4] & KC01 - KC05 & KC12 - 13 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: Villages West of Cromer

| Site | Is the Site Suitable? | Is the Site Available? | Is the Site Deliverable / Developable? | | | Current Position |
|---------------------------------------|--|----------------------------|--|-----------------------------------|--------------------|---|
| | | | Dev Expected? | Major Infrastructure Constraints? | Agent? | |
| Aldborough | | | | | | |
| ALD01 | Well integrated mixed greenfield / brownfield sites. | Yes, as indicated in SHLAA | Within 5-10 years | None | Irelands Surveyors | |
| ALD07 | | Yes, as indicated in SHLAA | Within 5-10 years | None | None appointed | Garage would need relocation prior to development |
| Blakeney | | | | | | |
| BLA03 | Potential to provide safe access and improvements to footpath. Greenfield site, landscape impact can be minimised with careful attention to detail | Yes, as indicated in SHLAA | Within 5 years | None | Grounds & Co | Agents advise that both house builders and Housing Associations have expressed interest in developing the land. They do not envisage any exceptional development costs. |
| Briston & Melton Constable | | | | | | |
| BRI02 | Greenfield site adjacent to built up area. Village school and shops accessible on foot | Yes, as indicated in SHLAA | Part of the site within 5-10 years | None | Peter Walker | |
| BR124 | Well integrated mixed brownfield/ greenfield site | Yes, as indicated in SHLAA | With 5 - 10 years | None | G W Margarson | |



| | | | | | | |
|-----------------------|---|----------------------------|--------------------|------|---------------------------|--|
| BRI27 | This site is well integrated with pedestrian links to key facilities | Yes, as indicated in SHLAA | Within 5 -10 years | None | - | |
| Corpusty | | | | | | |
| C0R01 | Well integrated greenfield site | Yes, as indicated in SHLAA | Within 5 -10 years | None | Mr H Ivins | |
| Little Snoring | | | | | | |
| SN01 | Well integrated greenfield site | Yes, as indicated in SHLAA | Within 5 -10 years | | Simon Westaway Associates | |
| SN05 | Well integrated greenfield site adjacent to the village school and existing housing. | Yes, as indicated in SHLAA | Within 5 -10 years | | - | |
| Walsingham | | | | | | |
| WAL01 | Site borders existing housing and would not encroach into the wider landscape setting of the village. No impact on historic centre/ Conservation Area | Yes, as indicated in SHLAA | With 5 -10 years | None | Walsingham Estate office | |
| Weybourne | | | | | | |
| WEY03 | Site is well related to other development and village facilities | | Within 5 years | None | | |
| WEY09 | Greenfield site adjacent to built up area | Yes, willing landowner | Within 5 years | None | - | |