



**North Norfolk District Council Local Development Framework
Examination into Site Specific Proposals**

Stalham

**Statement by Savills
on behalf of
Messrs N & P Wright and Mrs W Josephs (representor number 324591)
in relation to ST01**

And

Mr and Mrs N Wright (representor number 400894) in relation to KC09

General Matters

iii) Do they “conform generally” with the regional spatial strategy (East of England Plan)?

- 1 We leave it to the Examination to consider whether the proposed DPD taken as a whole generally conforms to the Regional Strategy. We do however, consider that it remains appropriate for the Examination to consider whether the DPD as a whole generally conforms to the RS notwithstanding the Secretary of State’s intention to abolish Regional Strategies (RS). It is our view that until such a time as the RS is abolished, the East of England Plan remains part of the development plan and the Inspector is, under a statutory obligation by S24(1) of the Planning and Compulsory Purchase Act 2004, required to find the DPD in general conformity with the RS. To find otherwise would render the plan vulnerable to challenge in the High Court.

v) In the light of the Core Strategy, has the correct/appropriate amount of development been allocated within the DPD and in each settlement?

- 2 Stalham has been identified by the Core Strategy as a secondary settlement and a sustainable location for development. The Core Strategy suggest that an allocation in the range 150 – 200 is likely to be required at Stalham to achieve an overall level of 400 homes over the plan period. An allocation of c160 homes at Church Farm (ST01) accords with Core Strategy and is appropriate.

vi) Is it essential to make so many greenfield allocations, both at the towns and the villages, or are there preferable PDL alternatives, at least to the smaller sites?

- 3 PPS3 and the EEP move away from the former PPG3 approach of previously developed land first, greenfield land only when PDL sites have been delivered. PPS3 and the EEP recognise that in many instances, particularly in a largely rural region such as the East of England, that greenfield development on the edge of settlements may be a more sustainable approach than the re-use of previously developed land. It is also a recognition that many sites which are PDL are in existing employment use and to re-allocate those uses for residential is likely to result either in the loss of employment sites or in the development of greenfield land for employment purposes. Additional greenfield housing and employment provision is needed in to deliver the Core Strategy’s vision for Stalham as performing a stronger role as a local service centre.

- 4 A key driver behind both PPS3 and the EEP is to ensure that there is a readily available supply of land to meet housing needs. In a rural area such as North Norfolk significant greenfield land release is likely to be needed in order to meet housing needs and maintain housing land supply.

viii) Do any of the allocations have unacceptable impacts on/implications for designated European, national or local wildlife sites?

- 5 Development of ST01 would not have an unacceptable impact on designated wildlife sites. At over 9 hectares in area the site can provide for a greater level of open space than is required to meet the needs of the development alone. This local provision of open space will help meet the town’s wider needs and reduce pressure on nearby habitats.

Stalham

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?

6 Land at Church Farm (ST01) is available, suitable and achievable for a development of at least 160 homes.

Availability of ST01

7 The site is being promoted by the landowners. It is available for development.

8 A number of approaches have been made to our clients by house builders interested in developing ST01. At this stage those developers have been advised that our clients wish to self-promote and once the site has secured an allocation it will be brought to the market. We envisage a period of up to 18 months to bring on board a developer, obtain a planning permission, discharge conditions and make a start on-site. Assuming the DPD is adopted by December 2010, we would anticipate a start on site by June 2011. Delivery of around 50 homes a year would suggest completion of development in year 2015/16.

Suitability of ST01

9 The Council has undertaken a sustainability appraisal and comparative assessment of the sites around Stalham. Land to Church Farm performs significantly better than other locations in that appraisal.

10 In particular, the sustainability appraisal records Norfolk County Council as concluding that ST01 is the most suitable from a travel perspective. ST01 provides the best opportunities for accessing services and facilities by walking and cycle.

11 In relation to comments from other consultees, no significant issues are identified. Development of ST01 would have limited environmental impact, whilst at the same time it scores well in terms of the social objectives in the sustainability appraisal.

12 ST01 is suitable for development.

Achievable

13 Development of the site can be achieved. The accompanying access audit demonstrates how access to the site can be achieved and there are no insurmountable obstacles to development (see response to xiii)

x) Is there a reasonable prospect of the remaining allocations being developed within 15 years?

14 We consider that the site will deliver new homes over the period to 2015/16.

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"?

15 We consider that the allocation proposed by KC09 is unsound for the reasons set out in our representations and in response to question xvii.

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

16 The sustainability appraisal demonstrates that the allocation of ST01 Farm is the most appropriate and sustainable option available. It is located in close proximity to key services and facilities.

17 Development will deliver a major open space in part of the town which is currently deficient of outdoor recreational facilities. Development of alternative sites around the town, especially to the north east side of the town, would not assist in redressing this imbalance.

18 No significant issues with site ST01 are identified by the sustainability appraisal. Indeed the sustainability appraisal confirms that ST01 is the most appropriate and sustainable location to deliver new homes at Stalham.

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?

19 There are no demonstrable constraints to bringing ST01 forward. Accompanying this statement are:

- a tree survey;
- preliminary access audit; and
- wastewater assessment.

20 The boundaries to ST01 contain a number of trees. A tree survey has been undertaken, which identifies three trees along Yarmouth Road as being of category A and worthy of retention and one along Ingham Road. The remaining trees are all of lower quality and do not pose any constraint on development. The tree survey is overlain on an initial access proposal. Subsequent to receiving the tree survey, the access arrangements have been amended and are included with the preliminary access audit.

21 The preliminary access audit demonstrates that adequate access can be achieved in accordance with Manual for Streets and taking into account the location of the trees.

22 The wastewater assessment identifies that there are no insurmountable constraints to delivery. A pre-development inquiry has been made to Anglian Water, although a response has not yet been received. Based on their local experience, Bingham Hall Associates advise that wastewater issues are unlikely to be an insurmountable constraint to delivery.

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

23 ST01 is arable land. Its neighbours include a small number of residential properties, schools, land proposed for a new Police station. The site is not designated for its

environmental value. Development of ST01 would not have any adverse environmental impact, nor impact on neighbours, or itself be adversely affected by any neighbouring uses.

- 24 Objectors allege that there would be an adverse affect on the schools by virtue of traffic. One of the advantages of the site is ease of access to schools. This will enable children to gain easy access to both primary and secondary schooling without the need to travel by car. Development at less well-located sites, such as ST16, would generate car travel to the schools owing to the poor links and distance between those sites and the schools.
- 25 ST01 is relatively flat and its development is unlikely to have any material landscape impact. The Council's Conservation Team consider that development of ST01 is possible without detrimental impact on heritage interest.

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"?

Alternative sites

- 26 The sustainability appraisal considers alternatives to ST01. Only one site is being suggested to the examination as an alternative - Site ST16. This site scores poorly in the sustainability appraisal against the environmental, social and economic criteria.
- 27 Supporters of the site suggest that it site is preferable in highways terms, much of which appears to revolve around ease of access to the A149. We consider that this point demonstrates the sites unsuitability for development. It will encourage travel to alternative locations, when an aim of the Core Strategy is to focus investment on Stalham. ST16 is likely to encourage more car movements around the town. Firstly, it is likely to generate car travel to the schools, whilst residents at Church Farm would have a short walk to schools. Secondly, ST16 will also generate double movements – that is people travelling to schools, then having to navigate their way back across town to the A149. The unsuitability of the site is reflected by Norfolk County Council's comments in the sustainability appraisal. The site's attractiveness to car travel will also result in greater carbon emissions.
- 28 We also consider that ST16 would represent a significant extension into the open countryside. It is on land which rises away from the town and would have a greater impact on the landscape. The site is also far less well contained than development of the proposed allocation site. Development of ST16 would have a greater landscape impact than development of ST01.
- 29 ST16 will also be more difficult to integrate into the town and local community given its location, somewhat divorced from the urban area. Land at Church Farm (ST01) is located close to the school and town centre and offers far greater prospect of being able to integrate development and build communities. The preferred allocation site will assist in delivering a compact a settlement form, whilst ST16 is divorced from the centre and will extend the sprawl of the urban area into open countryside.
- 30 The evidence base demonstrates that land at Church Farm is the most suitable site for development.

Availability of alternatives

31 Development of ST16 does not appear to be being promoted by the landowner or a developer. The site's availability is therefore questionable.

xvii) (All days) Is any "unsoundness" (in either of the DPDs) overcome by the Council's schedules of Key Changes and Minor Modifications?

32 The Council proposes to allocate land at Church Farm for residential and employment purposes. We consider that it would not be appropriate to access traditional employment uses (B1/B2/B8) from Yarmouth Road. Whilst technically achievable to access such uses from Ingham Road, we recognise the concerns raised by residents with regard to the school and commercial vehicles and have therefore proposed that:

- a. rather than the provision of B1/B2/B8 uses, employment be delivered at the site through alternative uses such as a care home provision;
- b. land at Brumstead Road be allocated for employment uses

33 To assist in meeting the town's employment needs the Council proposes to allocate land at Stepping Stone Lane (KC09). For the reasons set out in our representations that is not the most suitable site for employment uses and land at Brumstead Road (E11) should be allocated for employment.