

## Local Plan Further Consultation Schedule of Representations (Addendum)

This addendum corrects the omission of comments FC113 and FC132 which were previously omitted. This addendum should be read in conjunction with examination document EH006 (I).

Other/General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)

<b>Section</b>	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
<b>ID</b>	FC113
<b>Response Date</b>	26/11/24 15:29
<b>Full Name</b>	Julie Chance
<b>Organisation</b>	Stiffkey Parish Council
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Does the Proposed Change contribute to the overall soundness of the Plan?</b>	<p>Stiffkey Parish Council recognises the need that more housing is required in the district. However, the current plan seems to simply increase the number of houses to be built in areas already established as expanding- an approach which lacks any nuance. The plan as it stands seems to be increasing the number of houses to be built for the sake of meeting a set target, rather than looking what is needed and where. It is our view that, there needs to be far more thought as to what and where and should take the following more wholistically into consideration:</p> <ol style="list-style-type: none"> <li>1. Environmental Impacts – people living where they work/reducing the need to travel</li> <li>2. Locations of homes. Examine where people want to live and where their jobs currently are or where jobs are available locally. Reducing travel and commute times and knock on impacts on childcare, access to local amenities and so on</li> <li>3. Locally available public transport routes- reducing cars on the road and subsequent emissions</li> <li>4. Available amenities and facilities – such as doctors/dentists/shops</li> <li>5. Work from home options – rural vs urban/internet speeds</li> <li>6. The types and ownership of the proposed properties – affordability vs social housing vs more 2<sup>nd</sup> homes/investment properties. Increased housing is not appropriate if it fails to adequately plan for the needs of its community and full-time resident population.</li> </ol>
<b>Do you consider it necessary to participate in a public hearing session, should these be required?</b>	
<b>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</b>	
<b>File (where submitted)</b>	
<b>Officer Summary</b>	<p>Stiffkey PC recognises the need that more housing is required in the district. However, the current plan seems to simply increase the number of houses to be built in areas already established as expanding- an approach which lacks any nuance. The plan as it stands seems to be increasing the number of houses for the sake of meeting a set target, rather than looking at what is needed and where. It is our view that there needs to be far more thought as to 'what and where' and should take the following into consideration.</p> <p>Environmental Impacts - people living where they work/reducing the need to travel. Locations of homes - examine where people want to live and where their jobs currently are or where jobs are available locally. Reducing travel and commute times and knock on impacts on childcare, access to local amenities. Locally available public transport routes- reducing cars on the road and subsequent emissions. Available amenities and facilities – such as doctors/dentists/shops. Work from home options – rural vs urban/internet speeds. The types and ownership of the proposed properties – affordability vs social housing vs more 2<sup>nd</sup> homes/investment properties. Increased housing is not appropriate if it fails to adequately plan for the needs of its community and full-time resident population.</p>

<b>Officer Response</b>	<p>Comments noted: The emerging Local Plan is at an advanced stage, with Hearing sessions for the Plan being held in early 2024. The proposals put forward in the Further Consultation are in direct response and focussed on specific matters raised by the Inspector in his Initial Findings letter [Examination ref. EH006(f)], in order to achieve the required local housing need target of 557 dwellings per annum. The Inspector has been clear in his letter of 30 August 2024 [Examination ref. EH006(h)] and set out in appendix 7 to the further consultation, at paragraph 7, that the Plan is ‘capable of being found sound with limited additional work to address soundness issues, but that additional work should be progressed at pace.’</p> <p>The Local Plan is a strategic document that provides a range of planning policies in order to achieve climate resilient sustainable development, in alignment with the National Planning Policy Framework. The settlement hierarchy set out in Policy SS1 directs approximately 90% of housing growth to the identified towns and larger villages, where the highest levels of services, facilities and access through public transport are available. The inspector in his initial letter to the council (May/ June 2024), as detailed in appendix 7 of the consultation material confirms that the spatial strategy as set out in SS1 is a justified approach and the methodology for arriving at the hierarchy as set out in background paper 2[C2] and the site selection methodology in Background paper, [C6] provide the appropriate evidence. It should be noted that this policy and approach has already been examined and as such is not part of the further consultation.</p> <p>Other policies contained in the local plan add further details in relation to the requirements for matters such as affordable housing and infrastructure provision. In addition, the Further Consultation proposes an additional 10 small growth villages, making a total of 33 villages having the opportunity to benefit from small scale housing development. In particular, the Distribution of Growth Background Paper 2 [ Examination ref.C2], and associated Addendum submitted in support of the Further Consultation, sets out the methodology and assessments for the settlements contained within the settlement hierarchy and justifies the distribution of growth, the principle of which has already been accepted by the Inspector. The plan has been informed by a sustainability appraisal throughout its production which takes account of environmental, economic and social considerations.</p>
<b>Section</b>	General Comments (including those not directly relating to a Proposed Change as set out in the Further Consultation)
<b>ID</b>	FC132
<b>Response Date</b>	03/12/24 13:36
<b>Full Name</b>	Sasha Walton
<b>Organisation</b>	
<b>Agent Full Name</b>	
<b>Agent Organisation</b>	
<b>Does the Proposed Change contribute to the overall soundness of the Plan?</b>	<p>The Shortfall in Housing Provision.</p> <p>On this issue the Local Plan Inspector identified an overall shortfall in planned housing provision in the Draft Local Plan. In order to address the shortfall and to provide flexibility in the delivery of new housing across the revised Local Plan period 2024-40, the Council is proposing new site allocations, extended site allocations, and an increase in the indicative new housing allowance for Small Growth Villages.</p> <p>If all of the Proposed Changes outlined in the consultation document are made to the Local Plan it will enable a minimum of 1,271 additional dwellings to come forward over the Local Plan period 2024-2040. This is comprised of approximately 850 additional dwellings from site allocations and approximately 421 from new and existing Small Growth villages.</p> <p>The potential additional sites and options for extending existing allocations in the Local Plan have been collated into two separate groups. Categories include a table which identifies whether a site is:</p> <ul style="list-style-type: none"> <li>• Suitable – The site is considered appropriate for development.</li> <li>• Available – The site can be developed.</li> <li>• Deliverable – The site can come forward within the first 5 years of the Council’s Housing Trajectory.</li> <li>• Current Status – The most up to date information regarding the site is provided.</li> </ul> <p>Group A sites are those that have been selected through a review of individual site assessments contained within each Site Assessment Booklet. The additional sites set out in Group A contains those sites that were previously assessed through the Local Plan’s Site Assessment Process and were considered to be suitable for development but were not identified for allocation.</p> <p>11 Group A potential sites have been identified. Catfield is identified as a Small Growth Village, having been a Service Village in the current Local Plan. None of the potential sites within this consultation are within Catfield. The indicative level of growth that this approach</p>

	<p>could deliver across Small Growth Villages over the adjusted Local Plan period 2024-2040 is set out in updated 'Table 2 Small Growth Villages Housing Apportionment'.</p> <p>Within this table and despite no site within Catfield having been identified., applying an Indicative Housing Allowance at 9% increases the number of houses planned from 27 to 39.</p> <p>Map 22 of the current Local Plan shows the settlement boundary of Catfield boundary, which would not change through the work undertaken in this consultation. It is perfectly clear from the land use allocations on Map 22 that this village has (historically) been allocated a disproportionately high level of employment land (on its northern side) when compared with the remaining residential development on its southern side.</p> <p>What is also clear is that the within the southern demarcation of the village boundary there are very few, if any areas where the increased allocation of 39 dwellings could be accommodated.</p> <p>With this disproportionality of land uses and the need for the Council to find additional growth from within its Small Growth Villages it is hard to understand why the prospect of taking a relatively small portion of land from the employment area and allocate it to the increased number of dwellings for Catfield has not been factored into this consultation.</p> <p>The former mushroom site and land in the south-western corner of the employment land allocation would represent a perfectly acceptable land use allocation, with its relationship to adjoining housing and the former Milestones Hospital which is to be converted to residential.</p> <p>This site is suitable, available and deliverable. It has a history of multiple attempts to redevelop this area, having been unoccupied for many years and unlikely to be put forward for any employment based use during the life of the new Local Plan. It is also known to have the support of the local Parish Council.</p> <p><b>This representation therefore is an objection to the failure of the Council to recognise the potential of the redesignation of a small portion of land from within the employment area of Catfield, to assist in the housing growth in this village.</b></p>
<p><b>Do you consider it necessary to participate in a public hearing session, should these be required?</b></p>	
<p><b>If you wish to participate in a hearing session(s), please outline why you consider this to be necessary:</b></p>	
<p><b>File (where submitted)</b></p>	
<p><b>Officer Summary</b></p>	<p>Object: objection that the redesignation of a small portion of land from within the employment area of Catfield, to assist in the housing growth in this village has not been recognised.</p> <p>Describes the shortfall in housing provision within the Plan, as stated by the Planning Inspector and the justification for the site options that have been put forward within the further consultation, where 11 'Group A' sites have been identified. Catfield is identified as a Small Growth Village, but none of the potential sites in this consultation are within Catfield. The proposed 9% indicative level of growth for Catfield would be 39 dwellings, despite no site being identified.</p> <p>Map 22 of the current Local Plan shows the settlement boundary of Catfield, which would not change through the work undertaken in this consultation. The Map shows that the village has (historically) been allocated a disproportionately high level of employment land (on its northern side) when compared with the remaining residential development on its southern side, where there are few if any areas where the increased allocation of 39 dwellings could be accommodated. It is considered appropriate to take a relatively small portion of land from the employment area and allocate it for housing in Catfield, but this has not been factored into this consultation.</p> <p>General comment: Promotion of site - former mushroom site and land in the south-western corner of the employment land allocation would represent an acceptable land use allocation, being suitable, available and deliverable. It has a history of multiple attempts to redevelop this area, having been unoccupied for many years and unlikely to be put forward for any employment-based use during the life of the new Local Plan. It is also known to have the support of the local Parish Council.</p>

<b>Officer Response</b>	<p>Comments noted - Disagree: The designation of Catfield and its settlement boundary has been through examination and are not part of the current consultation. Policy SS1 Spatial Strategy of the emerging Local Plan does not allocate sites for Small Growth Villages, but provides an indicative housing allowance and directs that such growth would need to meet the requirements of criteria 3 of Policy SS1,( as modified) which include that the site must immediately abut the defined settlement boundary.</p> <p>Settlement Boundary Reviews have been carried out for the existing and proposed Small Growth Villages. The existing 23 Small Growth Villages boundary review Background Paper 11 can be found in the Local Plan Examination Library on the Council's website under Section 4.1: Evidence background papers. The defined settlement boundary for Catfield can be viewed within this Background Paper, where two additional areas were proposed to be included within the settlement boundary (CAT.01 &amp; CAT,02) and therefore, will slightly differ to the current Core Strategy Map 22. This boundary has already been subject to examination and is not part of this consultation.</p>
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February 2025