

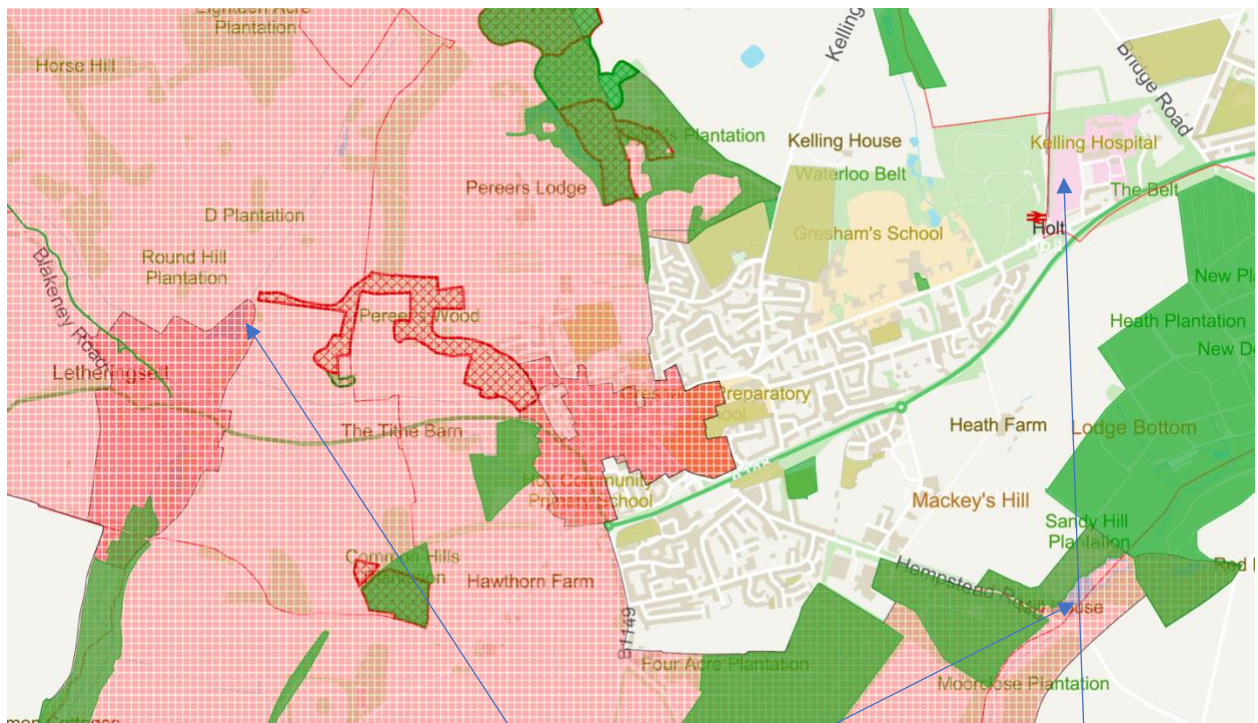
## QUESTIONS for THE DISTRICT and TOWN COUNCILS

### 1 POLICY HOLT 3 GREEN INFRASTRUCTURE PLAN F

The Plan F reproduced in Appendix 1 has a reference to “Ramsar Site” in the key and I am having difficulty in locating it (them) on the Plan possibly due to the lower quality colour resolution of the map on my hard copy and the digital version. Could NNDC OR the Town Council clarify the location and name of the Ramsar site(s)

I note there are also two “indeterminate coloured areas” on the map which I cannot relate to the key. Could NNDC or the Town Council clarify the name and the status of the two “indeterminate areas” I have highlighted on the Plan below.

There is a pink coloured area within the Kelling Hospital curtilage. Could NNDC or the Town Council clarify this represent?



Indeterminate Areas

What is this designation?

## 2. POLICY HOLT 4 EMPLOYMENT GROWTH IN HOLT

This proposed Plan policy allows an exception to the current Local Plan (Core Strategy) policy SS4 Economy which doesn't allow retail on the designated employment site at Old Station Way. The Core Strategy establishes that retail development of the nature proposed (1,400sqm) is only possible in the town centre.

The emerging Local Plan, Policy E 2 is concerned to protect employment areas from main town centre uses (retail) unless an exception can be made on a range of criteria including there are no more sequentially preferable sites available in the town centre.

Furthermore, emerging policy E 4 Retail and Town centres establishes that support for out-of-centre development such as proposed "will be dependent on how it reflects the capacity available to support the proposal as identified in the retail study and subsequent permissions, how it seeks to enhance expenditure retention and in relation to the assessment of impacts on the town centre in accordance with the locally derived impact thresholds (ie 500 sqm for Holt). I note the North Norfolk Retail & Main Town Centre Uses Study (2017) projects a retail floorspace increase of 493 sqm up to 2026 and 1976 sqm by 2036. The policy proposed exceeds the 500 sqm and the 493 figure but not the 1976 sqm projection.

I am also aware that there was an expired permission for retail ref: PF/14/1373 granted in 2014 for 1429sqm of retail space subject to conditions including limits on convenience and non-convenience sales in order to protect the vitality and viability of the town centre. According to the Committee report this was accepted as an exception to Local Plan policy at the time on the basis of a previous permission, proof in a sequential test of no alternative town centre sites and a demonstration in an Impact study that there was no detrimental impact on the town centre. I am also aware of the findings of the North Norfolk Retail & Main Town Centre Uses Study (2017) which lends support to this retail development of this site, in particular on the basis of the need to provide more convenience shopping and the lack of sequentially available sites in the town centre.

On the basis of the material weight of the previous lapsed permission and the Retail Study evidence it is possible that this supports the non-conformity with the current Local Plan. strategic policies.

In view of the non-conformity with the current local Plan policy, the time since the permission was granted, and that the North Norfolk Retail & Main Town Centre Uses Study (2017) is nearly 6 years old, I wish to seek reassurance the same planning parameters apply, in particular, conformity with the sequential test and that the scale of development proposed is acceptable in terms of the retail hierarchy in the area.

The sequential test requirement aspect applies to the hotel proposed as it is also a main town centre use subject to these policies and evidential requirements.

I note the NNDC has not raised an objection to the proposed policy. However, I would like the NNDC to comment on the following questions:

1. Given the current policies (Core Strategy SS4) and the evidence of the emerging Local Plan (expressed in Policy E 2 and the retail study), which is more flexible in its approach to allowing main town centre uses on out of centre on employment sites, is there sufficient evidence to uphold the exception to the current policy and that retail is still acceptable on this site. In particular, is the sequential test satisfied and does a retail use of the scale proposed not harm the vitality and viability of the town centre and /or the retail hierarchy in the area bearing in mind the indicative figures for retail development in Holt in the emerging Plan (referred to above)?

2. Is it correct to presume that given the time since the retail permission lapsed are there still no site-specific constraints to retail or hotel development of the scale proposed, in terms of development management policies and considerations?

### **3) POLICY HOLT 6 CONNECTIVITY IN AND AROUND HOLT**

Please could the Town Council clarify what the pink lines are on PLAN H? If these are footpaths what is their status?

### **4) POLICY HOLT 7 OPEN SPACES**

I note there is reference to the Lodge Close Play Area and yet from maps of the area Lodge Close seems distant from the location of the proposed open space. Can the Town Council confirm whether this is the correct name for this open space and, if not, what is the correct description?

R J Bryan, MRTPI, Examiner  
23/1/23