

Examination of Holt Neighbourhood Plan
Joint Response to Examiners Questions
North Norfolk District Council & Holt Town Council



February 2023

1) **Policy HOLT3 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?'

NNDC & Town Council Response:

RAMSAR

The map key denotes environmental destinations which might apply. There is no RAMSAR designation in the neighbourhood area which is why it is not visible on the map. A modification is proposed to replace **Appendix A** with the attached version. This will remove the reference to 'RAMSAR' in the map key.

Indeterminate Coloured Areas

The indeterminate coloured areas relate to bodies of water overlaid by a Conservation Area. These bodies of water are part of the OS map base and have not been added by Holt Town Council in preparing the Plan.

The other designations in this vicinity are Conservation Areas (Glaven Valley, Letheringsett with Glandford, and Holt). Where more than one Conservation Area is overlain by another, this shows on the map as being of darker appearance.

Kelling Hospital

The pink colour at this location appears to denote a health care setting. The colour relates to Ordnance Survey's map base product, is not an addition to the map for the HNP, and consequently is not considered necessary to explain in the map key.

2) **Policy HOLT4 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?'*

NNDC Response

The Council acknowledges that there is a potential conflict between HNP policy HOLT4 and the current Local Plan (Core strategy) and emerging Local Plan (eLP) policies, namely (Core Strategy SS5 and eLP Policies E 1, E 2 and E 4). Nevertheless, the Council has not raised any objection to HOLT4 in part because of the planning history of the site to which you have referred and further because of the absence of suitable sites for retail and hotel proposals within the town centre along with the aspirations of the town council.

Although HNP Policy HOLT4 has not been supported by reference to up-to-date evidence demonstrating that the site remains sequentially preferential, the Council has no reason to challenge this assumption. The site is also brownfield land, with the previous use having ceased and relocated with the associated buildings having now being demolished and the site remains well connected to the town centre, with an underpass for pedestrian and cycle use close by. However, there would be no objection should you consider it necessary to align the policy better with national and local policies and modify HNP policy HOLT4 to ensure that any retail proposal on land at Old Station Way demonstrates compliance with the sequential test.

It should be noted that the retail study published by the Council recognised that Holt is the most obvious area of qualitative deficiency in food store provision in North Norfolk District, and that additional provision through the proposed store (at the time) would help address this deficiency and would reduce expenditure leakage to surrounding towns. The study in its calculation of future floorspace projections also took into account this now lapsed retail permission and floorspace commitment (of 1,140sqm net at the time of writing) when it established the remaining capacity floorspace tables to support future convenience and comparison retail. The true future capacity available to support future growth is greater than that published in the Council's study as for various reasons the development did not happen and as such the floor space projections from the 2017 study under predict the amounts by the levels in the now lapsed retail permission i.e. approx. 1429sqm gross.

Please note that a proposed modification to the emerging Local Plan has been put forward to correct the factual error in table 6, page 137, Projected Floorspace Requirements 2016 -36 referencing the figures do not include the lapsed retail permission and correcting the table date to 2026.

It is recognised that that these projections (modified to take into account the lapsed permission) were undertaken under different market conditions, nevertheless they remain the most up to date and robust available. Perhaps it should also be noted that the available expenditure levels will have increased in line with the population increases due to the relative

substantial housing completions in the town in the intervening period through the completion of previous residential allocations and additional larger scale residential permissions.

A retail proposal of the type envisaged by the Holt Neighbourhood Plan policy may give rise to a proposal that does not seek to identify the level of impact on the town centre, though in practice it is considered that these matters and the concerns raised regarding hotel proposals would need to be addressed against other policies of the development plan and national policy at the time of determination. Policy HOLT4 does not purport to grant automatic permission for such proposals but rather would allow for additional flexibility in the application of the Core Strategy or emerging Local Plan policies reflective of the specific circumstance of the neighbourhood plan area. A useful clarification, should you be minded, could be to modify policy HOLT4 to ensure that any retail proposal on land at Old Station Way demonstrates compliance with the emerging Local Plan Policy E4 and/or specifically the requirements around the locally derived impact thresholds.

Additional Holt Town Council Commentary

Note to Examiner: Holt Town Council – Neighbourhood Plan

HOLT4

We respectfully wish to reply to the Examiner to stress the specific and unique circumstances of the site in question, in conjunction with the development of the retail offer in Holt town centre.

The Station Road site is the only realistic opportunity to provide the growing town with more local food shopping floorspace for the foreseeable future. The site is close enough to the town centre to serve as part of it in effect. We also believe that its planning history is relevant in establishing a land use principle which we wish to retain.

The goal of the policy is to go further than SS4 in encouraging a new proposal by lowering its planning risk (of a refusal) and to persuade the owner or retail developer to invest in making a new application. It does this by accepting the land use principle so that the cost of proving no harmful effect of a proposal via the sequential test etc does not need to be borne.

Given the limited size of the site, and the scale of existing, and forecast, retail leakage from Holt to other towns, a proposal coming forward that is so great that it would have a harmful effect on the town centre is most unlikely. However, we wish to safeguard our opportunities to fulfil an extremely important development requirement for Holt's resident community, as swiftly as possible when it presents itself.

We are only seeking to refine a strategic policy - SS4 - to fit a Holt-specific circumstance that will only apply to this site on the edge of this town centre. HOLT4 could not, therefore, undermine how SS4 operates elsewhere in the district.

This development has a great deal of community support and was one of the most often discussed at our consultation events. It has also been the subject most often brought to Holt Town Councillors individually since we began our talks on the matter of retail choice in 2014. A 72%+ leakage from Holt to other local towns for regular weekly/monthly household shops, was also identified. Over this time the situation has not lessened; it has, if anything, increased.

The reason we have this difficulty in Holt is due to the unique nature of the Town centre and Holt's everyday shopping offer. As shops have become vacant the town has seen a significant increase in Caf  s, Galleries, High-End Clothing and Artistic & Craft provision. Whilst these do draw in various visitors over the year, our residents now have decreased opportunity in the household provision market and less financial choice. This is what supports our case in HOLT4 and Holt is the only one of the North Norfolk Town's to which these facts apply.

We would, therefore, politely submit that the reasons we give can support HOLT4 in its special context as it typifies the unique characteristics underpinned by the individual aims of Neighbourhood Planning. We do not want to lose opportunities for this site, especially as it is in such close proximity to Holt centre. It can provide a proven necessity for the Community of Holt and is strongly supported.

3) Policy HOLT6 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?'

NNDC & Town Council Response:

The pink lines on Plan H denote adopted public footpaths, derived from Norfolk County Council PROW data.

A modification is proposed to replace the map with the below/attached version as a correction and for reasons of clarity. This is to achieve two outcomes:

1. Inclusion of a map key to sufficiently explain the designated / annotated areas.
2. To correct an error in this version of the plan around the extent of the proposed 'Green Wheel'. Although there are public footpaths and access to Holt Lowes, as depicted, the map should be altered to show that the Green Wheel discounts an area at the southern end, which is within Holt Lowes SSSI. The Town Council confirms that the proposed Green Wheel should align to the existing footpath (shown pink on the map), which run parallel to the eastern border of Holt Country Park.

4) Policy HOLT7 Open Spaces

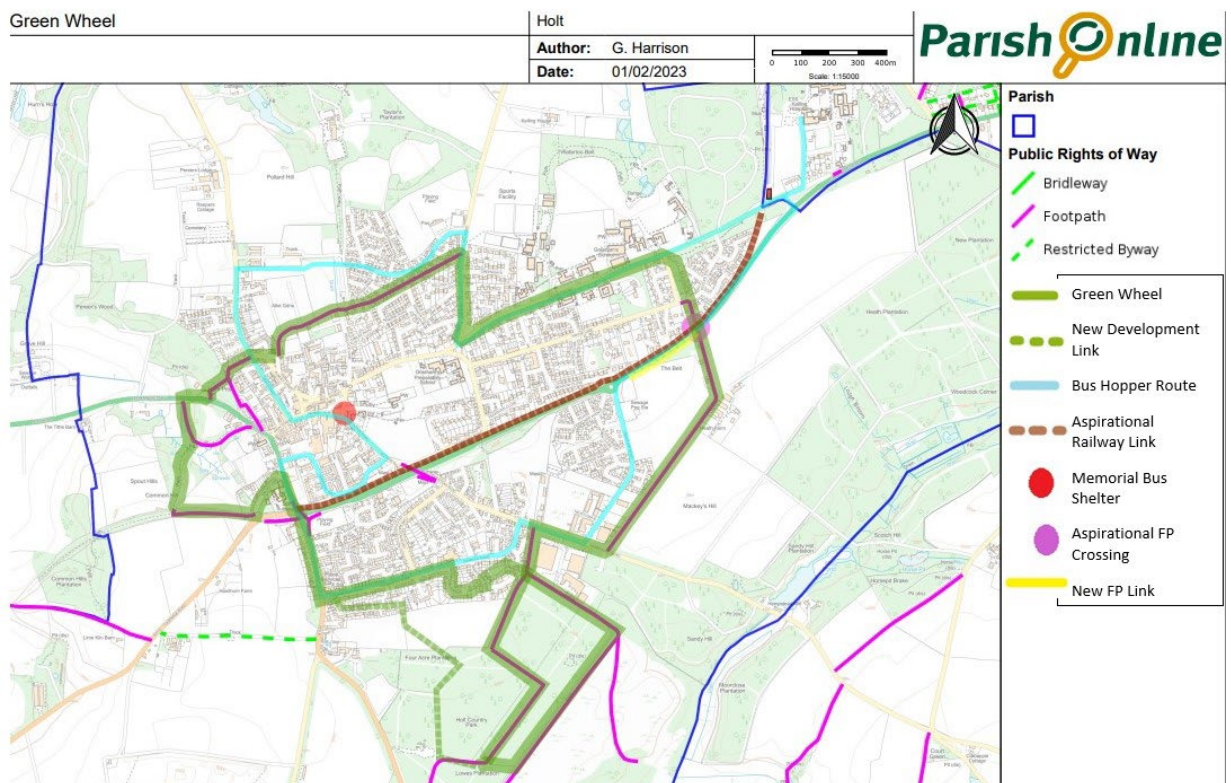
'I note there is reference to the Lodge Close Play Area and yet from maps of the area Lodge Close seems distant from the location of the proposed open space. Can the Town Council confirm whether this is the correct name for this open space and, if not, what is the correct description?'

NNDC & Town Council Response:

Lodge Close is the incorrect open space name. A modification is proposed as a correction so as to ensure that all references to 'Lodge Close Play Area' are changed to 'Neil Avenue Play Area'. For reasons of clarity, it is confirmed that the areas depicted in the map are correct.

In addition, a modification is proposed as a correction to the map caption so as to change 'Plan H' to 'Plan I'. Plan H relates to the Green Wheel under Policy HOLT6.

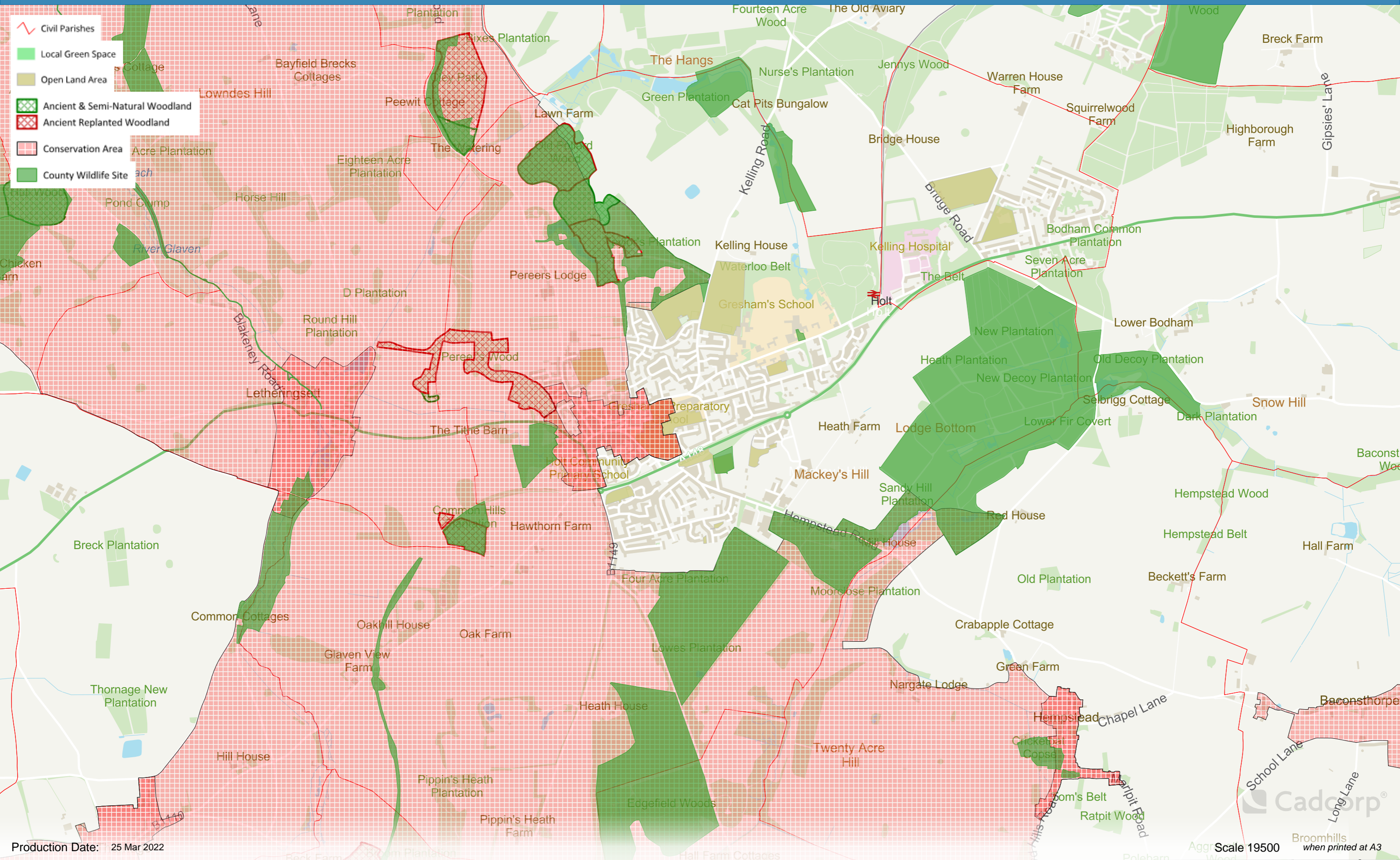
Revised mapping modification Plan H



Appendix A - Holt Green Infrastructure Map (May 2022)

Source: Holt Town Council

(see policy 'HOLT3 Green Infrastructure')



Production Date: 25 Mar 2022

Scale 19500 when printed at A3