



MATTER 2 HEARING STATEMENT

North Norfolk Local Plan Examination

On behalf of:

D L Ritchie Will Trust

Date:

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Document Reference:

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1.0 INTRODUCTION

- 1.1 This Hearing Statement has been prepared on behalf of our client, D L Ritchie Will Trust, in response to the Matters, Issues and Questions for the North Norfolk Local Plan Examination. It is intended to assist the Inspector's consideration of the soundness of the Plan and will form the basis of our points for discussion at the examination hearing session. We have responded to questions 2.3 and 2.4 that relate to our client's representations to the regulation 19 Local Plan.

2.0 MATTER 2. SPATIAL STRATEGY (SS POLICIES)

Question 2.3

Does the evidence justify the inclusion of the particular settlements in each of the top three tiers – Large Growth Towns, Small Growth Towns and Large Growth Villages? Is the distinction between Large Growth Villages and Small Growth Villages distinct or have any been misclassified?

- 2.1 With respect to the distinction between the Large and Small Growth Villages, Background Paper 2 Distribution of Growth (Ref: C2) provides a clear distinction between these two tiers in the hierarchy based on the level of service provision in the different villages. As shown in the table at Appendix 2, the four Large Growth Villages of Blakeney, Briston & Melton Constable, Ludham and Mundesley are the only villages in the district that have all three of the Key Services (i.e. primary school, convenience store and GP surgery). They are also the only villages that have all of the Secondary Services (i.e. main road, post office, other shopping, pub / restaurant and meeting place) and all of the Desirable Services (i.e. petrol filling station, vehicle repair workshop, place of worship and designated employment land). In this respect there is a clear distinction between the two categories of growth village that indicates the superior sustainability of the Large Growth Villages with respect to accommodating additional growth.

Question 2.4

How has the proportion of new development in Large Growth Towns (about 50% of the total) been derived? Is this a 'top down' policy decision or the consequence of assessing site opportunities? How have the lower proportions of development in Small Growth Towns and Large Growth Villages been derived, and do these proportions suitably reflect the relative sustainability of the settlements?

- 2.2 As set out in our client's Regulation 19 representations to Policy HOU1, whilst we have no objection

to the proposed settlement hierarchy or which settlements have been identified in each tier, we consider there to be significant issues with how development has been distributed between and within the tiers. In particular, we object to the level of development allocated to Ludham in comparison to both the Small Growth Villages and the other Large Growth Villages.

2.3 Policy SS1 allows Small Growth Villages to grow by 6% from the date of adoption of the Local Plan. By comparison, using the latest data contained in Background Paper 2 Distribution of Growth (Ref: C2) on the number of dwellings in each settlement (pp. 230-234), the Large Growth Villages are allocated growth of between 5% and 12%:

- Blakeney = 12% growth (66 new homes against 570 existing dwellings)
- Briston & Melton Constable = 12% growth (197 new homes against 1,539 existing dwellings)
- Ludham = 5% growth (35 new homes against 671 existing dwellings)
- Mundesley = 6% growth (102 new homes against 1,760 existing dwellings)

2.4 At just 5% growth, Ludham is taking proportionally less growth than the Small Growth Villages. It is also taking proportionally fewer homes than each of the other Large Growth villages.

2.5 As set out under question 2.3 above, the Large Growth Villages are more or less identical to each other with respect to their service provision. Background Paper 2 (Ref: C2) explains that the next stage in determining the distribution of growth was an assessment of constraints to development in each village, followed by a consideration of housing need and the potential availability of sites. Based on service provision alone we would expect Ludham to be allocated a similar proportion of growth to the other Large Growth Villages, but this is not the case. We would therefore expect there to be a clear difference between Ludham and the other Large Growth Villages with respect to its level of constraints, housing need and the availability of sites to explain the difference in housing allocations, but this is also not the case. As shown in the table below, Ludham is less constrained than Blakeney and has similar housing needs and land availability and yet it is allocated proportionally less than half the level of growth.

Table 1. Constraints, Housing Need and Land Availability Assessment (Source Background Paper 2, PP.69-93)

| Village | Constraints Assessment | Housing Need | Land Availability |
|----------------------------|-----------------------------|-----------------|----------------------------|
| Blakeney | Highly Constrained | Moderate Demand | Low Land Availability |
| Briston & Melton Constable | Limited constraints | High Demand | Moderate Land Availability |
| Ludham | Moderate-Highly Constrained | Moderate Demand | Low Land Availability |

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|-----------|----------------------|-----------------|-----------------------|
| Mundesley | Moderate constraints | Moderate demand | Low Land Availability |
|-----------|----------------------|-----------------|-----------------------|

- 2.6 The discrepancy between the proposed growth levels in Ludham and Blakeney clearly demonstrates that the proposed level of growth in Ludham does not suitably reflect its relative sustainability. This point is equally well demonstrated when one compares the 35 dwelling housing figure allocated to Ludham with the housing allowances for the Small Growth Villages, several of which are close to or higher than 35. It also does not reflect the clear need for affordable housing in the village with Background Paper 2 (Ref: C2) identifying 701 people on the housing waiting list with a preference for living in Ludham and 33 people on the waiting list with a local connection to Ludham. At 15% affordable housing (in accordance with Policy HOU 2) 35 dwellings will deliver just 5 affordable homes.
- 2.7 We would understand the decision not to allocate additional growth to Ludham if there were no other suitable sites, but the Council's own Site Assessment Booklet for Ludham (Ref: D11) clearly identifies that this was not the reason for not making additional allocations. It states at 3.1:
- "The site assessment concludes that three sites in Ludham are suitable and available for development - LUD01, LUD01A, and LUD06A. However, when considering the cumulative impact of developing these sites, it is not necessary to develop the larger site LUD01 as **it would provide a quantum of housing beyond what is required for this settlement**". (emphasis added)*
- 2.8 This clearly indicates that a decision was made regarding the quantum of housing to be allocated to Ludham before a consideration of the suitability of potential allocations and how they might enable the delivery of sustainable growth to meet clear needs in accordance with Ludham's place in the settlement hierarchy. The low proportion of growth allocated to Ludham is compounded by the fact that one of the proposed allocations (LUD01/A) has planning permission that demonstrates that it is suitable for just 12 dwellings and not the 20 allocated and the other allocation (LUD06/A) is clearly undeliverable and unsuitable (as set out in our Matter 5 Hearing Statements). Of the 35 dwellings allocated, only 12 are likely to be delivered during the plan period.
- 2.9 In conclusion, the low proportion of growth allocated to Ludham is not justified by the clear evidence which demonstrates the village's sustainability and housing needs. It is not an appropriate strategy and cannot be considered sound.