

North Norfolk Local Plan Examination – Further submissions
Matter 2: Spatial Strategy (SS policies)

Issue: Whether the spatial strategy of the plan is positively prepared, justified, effective and consistent with national policy as a suitable basis for planning the development of the district.

Relevant Questions:

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?*

2.5 *What criteria have been used to define settlement boundaries, and have these been consistently applied? (Any site-specific issues will be dealt with settlement by settlement).*

Original Representation Summary:

- Failure to address the special issues facing the settlements adjoining the Heritage and Undeveloped Coast area.
- Spatial Strategy is unsound as it fails to provide a context or framework to address the special circumstances of the settlements adjoining the Heritage and Undeveloped Coast in the far west of the District, namely the exceptionally high housing prices and second and holiday home ownership, which gives rise to the need to provide housing for primary local residency, rather than to simply meet overall targets.
- Local Plan definition of settlement boundaries is not sound.
- Para. 9.1.4: the basis of the definition of settlement boundaries needs to be clarified as it does not refer to topography or urban form. It appears to be simply a result of the number of dwellings planned and, consequently, arbitrary.

Examination Statement:

My name is John Edwards, and I am a resident of Wells-next-the-Sea and a retired Chartered Town Planner and member of the Royal Town Planning Institute. My most recent active post was at Chief Officer level. Since 2020. I have been vice-chairman of the Wells-next-the-Sea Neighbourhood Plan Working Party. The Neighbourhood Plan was submitted to North Norfolk in July 2023 and is currently at ‘Examination’ which is due to formally begin on 3rd January 2024. <https://www.north-norfolk.gov.uk/info/planning-policy/neighbourhood-plans/wells-next-the-sea-neighbourhood-plan/>

My interest in this examination is principally centred around Wells, however, the issues I have raised in my original representations are equally applicable to other settlements, particularly those adjoining the Heritage and Undeveloped Coast Area. My concern with the Spatial Strategy as proposed in the submitted Local Plan is that it does not appear to reflect some of the more nuanced issues that affect some of

these settlements and would affect their ability to play the role in the spatial strategy that has been identified for them. Instead, it appears that the Local Plan has assumed a substantial degree of homogeneity amongst the larger and smaller growth towns in particular and therefore made assumptions about their ability and suitability to deliver new housing growth.

Core Document 2: Background Paper 2 Distribution of Growth, undertakes an assessment of the various levels of settlement looking at factors such as levels of service provision, environmental and infrastructure constraints, housing need and potential availability of sites to arrive at a settlement hierarchy classification. However, the assessment fails to take into account more detailed issues affecting how a settlement functions, how the community uses those services which is different between settlements but also and different in those settlements that are within the Heritage and Undeveloped Coast.

Settlements in this position, such as Wells, have extremely high house prices and high levels of second home and holiday home ownership. Work undertaken to support the preparation of the Wells-next-the-Sea Neighbourhood Plan (WNP) revealed that rates of holiday and second home ownership were double that of the district as a whole (and still increasing) and that there are pockets within some areas of the parish second/holiday where home ownership comprises 90% of properties. The trend is not just confined to existing 'character' properties, as areas of new build such as Staithe Place are also being snapped up for holiday or second homes. In addition, the way that local services are used in settlements such as Wells are different to those of other settlements and presents different problems.

For example, evidence gathered during the preparation of the Neighbourhood Plan revealed that the High School is oversubscribed but this is due to attracting pupils from out of catchment rather than through the generation of Wells based pupils. Therefore, there is a need for expansion however, the providers will not fund expansion of the school because the need is due to children from out of catchment and at the same time the number of children being born in catchment is reducing annually. School expansion is also hampered by the lack of affordable and key worker housing required by teachers and other staff employed by the school. The Housing Needs Assessment Survey work undertaken by Housing Vision (previously supplied) with both Employers and with local residents revealed an often repeated key issue. To quote, "The number of second homes has a direct impact because if they are not locals in those homes and we aren't benefitting by getting these children into our school."

Therefore, the 'blunt' application of a settlement hierarchy that expects housing delivery in settlements such as Wells to meet an identified need and to continue to support its existing services is flawed unless additional policy measures such as principal residence are applied as houses on those development sites will be lost to holiday and second homes use rather than providing a means to meet local or district wide needs. The District Council's strategy objectives will not be met and although in strict numbers housing may well be delivered it will not be going towards

meeting the need it would be expected to provide for, and instead store up a problem of unmet need for future plans.

Settlement Boundaries

The Local Plan identifies settlement boundaries for a number of settlements. However, except for smaller growth villages there is no detailed methodology set out for why they have been drawn as they have. Para 9.1.4 of the submitted plan should be amended to provide clarity on the delineation of settlement boundaries. Whilst the paragraph briefly explains the policy implications for land both inside and outside of the boundaries, there is no explanation of how the boundaries themselves have been drawn. The NPPF makes it clear that the planning system should be genuinely plan led and policies should be clearly written, unambiguous so that it is evident to a decision maker how they should react to development proposals. The criteria for drawing the settlement boundaries should be uniformly applied to all settlements with a boundary throughout the hierarchy. In general, for settlement boundaries it needs to be clear to the proposers of development, where on the ground those boundaries will operate in so far as is possible.

The paragraph should briefly explain the criterion used for the delineation of the settlement boundary to:

- Reflect topography, and urban form; for example, ensuring the boundary follows the logical extent of existing built up areas through the use of physical features on the ground (where possible) e.g. fences, walls railings, highways, open spaces, water features, existing residential dwellings and their gardens should be included except where which this would encroach into open countryside, and
- Use boundaries, where appropriate, associated with other uses such as schools, public houses, commercial buildings, farmhouses and buildings, public parks and open spaces.
- Additional text should be added to paragraph 9.1.4 to make this clarification.