



North Norfolk
Joint Local Plan Examination

**Matter 5 Hearing Statements
Places and Housing Sites**

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Matter 5: Places & Housing Sites

5.1 General Questions

Q5.1.1 Does the methodology set out in the Norfolk Housing and Economic Land Availability Assessment (HELAA - Documents D13-D16) represent a justified approach to housing land assessment in general terms? (site specific issues will be dealt with settlement by settlement)

1.1.1 Yes, the methodology provides a justified and effective approach to the general housing land assessment. The detailed site assessment papers (D1-D12) provide a robust and detailed assessment of the site specific challenges and opportunities and provide a justified and effective evidence base supporting the proposed site allocations

Q5.1.2 (Particularly for the Council) Have all existing unimplemented housing allocations been brought forward into the emerging plan? If not, please list and give reasons.

1.1.2 No comment.

Q5.1.3 (Particularly for the Council) What is the definition of the term units of elderly care accommodation, and how does this relate to the Use Classes C3 (dwelling houses) and C2 (residential institutions)?

1.1.3 No comment.

Q5.1.4 In general terms, unless there are site specific issues, how have site capacities been estimated, both for dwellings and units of elderly care accommodation?

1.1.4 Gladman consider that this is a question primarily for the Council to answer.

Q5.1.5 In general terms, unless there are site specific issues, how have the areas of public open space been calculated for each allocation?

1.1.5 Gladman consider that this is a question primarily for the Council to answer.

Q5.1.6 Some allocations are affected by a defined Minerals Safeguarding Area and Policy CS16 of the Norfolk Minerals and Waste Core Strategy applies. What are the implications of this for the principle of development or for its timing, if any? Have the Minerals Planning Authority supplied site by site comments on these sites? If so, what are they?

1.1.6 No comment.

5.2 Cromer

Q5.2.1 Are the detailed Settlement Boundaries for Cromer and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given the policy function?

1.1.7 Yes, the settlement boundaries for Cromer and policy area designations included are suitable and justified.

Q5.2.2 Are the housing allocations for Cromer the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?

1.1.8 Yes, the proposed site allocations represent the most appropriate locations for development.

1.1.9 The Council has undertaken an extensive and rigorous assessment of the planning and sustainability implications of all development opportunities in Cromer and it is considered that the proposed development sites are required to meet the development needs of the town and district, which cannot be located on alternative sites that would cause less or no harm to the AONB.

1.1.10 The site allocations plan (adopted February 2011 recognises that “there are limited opportunities for brownfield redevelopment” (p.16) in Cromer. The current settlement boundary for the town is drawn tightly and there is very little land in or around Cromer which is outside of the AONB designation. In particular it is noted that “large-scale development sites are not readily available” (p.16) within the town, which limits the opportunities for redevelopment. These comments were made in the context of planning to meet the development requirements of the current statutory

development plan, which covered the period 2011-2021. The Council is now looking at accommodating the development needs for the period 2016-2036 and it is clear that settlement boundaries have to flex to meet housing and other needs.

- 1.1.11 Given that there are extremely limited opportunities to release additional land within the current settlement boundary; and, the fact that the AONB tightly wraps around the existing settlement, the provision of major housing development and the provision of no less than 60 units of elderly care accommodation outside the AONB would require identification of sites at a considerable distance from Cromer. Such development would no longer be related to, or meet the needs of Cromer itself, and would likely be an unsustainable means by which to deliver the required housing.
- 1.1.12 Although two of the three proposed site allocations are located within the AONB, they are well related to the main built form of Cromer and within a landscape with a relatively enclosed and settled character. The release of the Former Golf Practice site as proposed is considered to represent a highly sustainable option. It is better suited to meeting the development needs of Cromer than more remote locations outside of the AONB as it is better connected to the town and the services it offers.
- 1.1.13 Finally, the Council's Sustainability Appraisal (Appendix D) identifies the preferred options for development and explains why they are considered to be the most appropriate sites for development (including consideration of the impacts of releasing the sites for development in the AONB).

Former Golf Practice Ground, Overstrand Road (C16)

5.2.4 a) Has the site been allocated previously or is it a new allocation?

- 1.1.14 The site is a new allocation identified in Policy C16: Former Golf Practice Ground, Overstrand Road of the emerging North Norfolk District Council Local Plan, currently at examination stage.

1.1.15 Policy C16 sets out the requirements for the site allocation including the provision for approximately 150 dwellings, no less than 60 units of specialist elderly care, public open space and associated on and off-site infrastructure.

5.2.4 b) Does the site have planning permission and/or are there current applications under consideration? If so please list.

1.1.16 An Outline Planning Application (Reference: PO/23/0596) for the erection of up to 118 dwellings, up to 60 units of specialist elderly care accommodation with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point (Outline with all matters reserved except for access) was approved subject to S106 at Planning Committee on 7th December 2023.

5.2.4 c) Are any modifications suggested to the policy or text, or the site boundaries? If so, why, and are they justified or required for effectiveness?

1.1.17 No modifications are required to Policy C16 to meet the tests of soundness.

5.2.4 d) Have the impacts and effects of development been properly taken into account?

1.1.18 Yes.

1.1.19 The site is well situated to accommodate new growth lying approximately 1km from the town centre with existing pedestrian links. As such, it has access to a wide range of services and facilities that will be available to new residents.

1.1.20 Gladman support the Council's assessment that the site is not intrusive to the wider landscape and therefore is unlikely to result in harm to the setting of the AONB. The proposed policy requirements include provision for careful detailed design, retention and enhancement of hedgerows and trees, and landscaping to further mitigate any landscape impact.

5.2.4 e) Are the components of the proposal (number of dwellings, units of elderly care accommodation, amount of public open space etc) in the first sentence of the policy for the site justified?

1.1.21 Yes.

1.1.22 Further commentary relating to the proposed number of dwellings and open space requirements is set out in response to questions 5.2.4 g) and i).

5.2.4 f) What form would the public open space take?

1.1.23 The Local Plan glossary confirms the definition of open space:

"All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. In this Plan, three types are designated; Open Land Areas; Formal Education and Recreation Areas; and Local Green Spaces (also see separate glossary definitions)."

1.1.24 The approved Outline Planning Application includes provision for over 3ha of green infrastructure including, informal and formal public open spaces, a woodland, a green walk, structural landscape planting and an attenuation basin.

5.2.4 g) Having regard to these components, is the estimate of site capacity justified?

1.1.25 Gladman consider that the estimated site capacity of 150 dwellings and 60 specialist elderly care accommodation is justified and reasonable.

Notwithstanding this, during the course of the outline planning application preparation which is underpinned by a significant amount of assessments and analysis in to the constraints and opportunities presented and how best to respond to these. This level of detailed analysis is more extensive in scope and detail than should be expected from a capacity study to inform an indicative site yield for a Local Plan allocation.

1.1.26 It is Gladman's position that the approved planning application sets the parameters for a high quality form of development that aligns with Policy C16 requirements and balances the objective to make efficient use of land with the importance of protecting the AONB and the requirements of NPPF Paragraph 177, and other policy requirements of the emerging plan.

5.2.4 h) What is the land ownership position and is the site currently being promoted by a developer?

1.1.27 Gladman are contracted by the landowners to promote the site for residential development and have prepared an outline planning application on this basis.

5.2.4 i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

1.1.28 The site-specific policy requirements for the development of the site are generally justified, effective and consistent with national policy.

1.1.29 Proposed detailed design and landscaping requirements including retention and enhancement of hedgerows and trees on the site are proposed to mitigate the impact on the wider landscape and AONB, meeting the tests set out in NPPF Paragraph 177.

1.1.30 It is not clear of the justification for the proposed requirement to deliver a minimum of 1.31ha of multi-functional open space, beyond references to opportunities for green infrastructure and landscape mitigation. It is considered that greater flexibility could be incorporated into this policy requirement, however this is not a point of soundness and the approved outline planning application includes provision for over 3ha of green infrastructure including, informal and formal public open space, a woodland, a green walk, structural landscape planting and an attenuation basin.

5.2.4 j) Given the components of the proposal and the site requirements, would development of the site be viable?

1.1.31 Gladman confirm that the allocation and proposed development is viable and this is confirmed by the recently approved Outline Planning Application. As part of the application process we have undertaken viability testing the potential to deliver 45% affordable housing, in accordance with the adopted Core Strategy affordable housing target as well as delivering the new policy objectives of the emerging plan.

5.2.4 k) Overall, is the site deliverable within the plan period and is the expected timescale for the development of the site set out in the Council's updated housing trajectory realistic? Has the landowner/developer confirmed this?

1.1.32 Gladman confirm that the site is deliverable, available and the proposed timescales for delivery are realistic.

1.1.33 An Outline Planning Application (Reference: PO/23/0596) was approved subject to S106 at Planning Committee on 7th December 2023.

5.2.4 Extra Question l) Does the proposal constitute a major development in the AONB, and if so does it satisfy the test set out in NPPF paragraph 177?

1.1.34 The site is located wholly within the Norfolk Coast AONB, albeit on the very edge of the designation, adjacent to the existing built up area of Cromer.

1.1.35 The allocation (and Outline Planning Permission) satisfy the tests of Paragraph 177 a brief summary of the justification for the site allocation in the AONB are outlined in the following paragraphs.

1.1.36 Cromer is identified as a Large Growth Town in the settlement hierarchy of the emerging plan. This means that it has been identified as one of the main towns where relatively large-scale growth is to be focussed, in order to secure a sustainable pattern of development. In considering the appropriate levels of growth to Cromer however (and the appropriate sites to deliver the required growth), the emerging Local Plan (paragraph 10.0.2) acknowledges the landscape constraints that surround the town, including the AONB designation. It explains (paragraph 10.0.3) how the importance of the national landscape designation has been balanced against the functional sustainability of Cromer. For this reason, the scale of growth in Cromer is lower than at the other Large Growth Towns. Furthermore, it explains that the identified sites for development have been carefully considered in order to limit any impacts on designated landscapes.

1.1.37 Specifically to the site, the emerging Local Plan outlines that 'The site is within the Area of Outstanding Natural Beauty (AONB), is visually prominent from areas close to the site, but is not intrusive in the wider landscape.

The area is located within the Coastal Shelf as defined in the LCA, the strategy seeks to ensure that any new development is well integrated into the landscape and does not form a harsh edge. Whilst development would be visible from Overstrand Road and Northrepps Road, the impact would be mitigated by retaining existing hedges and trees around the site, incorporating significant internal open space and tree planting within the site, and introducing a landscape buffer to the northern and western boundaries. Such landscaping should aim to break up views of the new development. The site is large enough to accommodate the proposed number of dwellings and to achieve substantial amounts of landscaping and open space.'

- 1.1.38 The site has been selected for development by the Council (and proposed for allocation in the merging Local Plan) following an extensive and rigorous assessment of the planning and sustainability implications of releasing non-AONB sites for development. The proposed development, which is required to meet emerging development requirements in Cromer, cannot be located on alternative sites that would cause less or no harm to the AONB.
- 1.1.39 The significant benefits that will be delivered through the proposed development package will outweigh any very limited harm that arises to the AONB as a consequence of the development.

