

**North Norfolk LDF: Independent examination of Site Specific Proposals
Matters and Issues, and Inspector's main questions
Further Written Statement from CPRE Norfolk (ID number 150345)**

Summary

CPRE Norfolk considers that the submission is 'unsound' as the SSP allocations are not consistent with the Core Strategy Aim 1, and also Aim 3. The housing proposals will not be effective as regards the delivery of affordable housing, Policies SS1 and HO 2, while conflicting with SS 5, and EN 1, EN 2 and EN 9. Although there are significant implications for the District in relation to the two policy changes made in the 9th June amended PPS 3 (housing), this is not the principal reason for making this case. As the impact of the recession is now making clear, there is the need for a comprehensive review and re-think of the evidence base, and from this a need to reconsider the land allocations proposed in the SSP document and the reasoning that underlies them. We emphasise that this is not a criticism of the work done by the Council, but is the result of much rapid change.

We set out below our reasons and evidence, much of it only available very recently, for taking this position. This is done by responding to most of the Inspector's questions, taken in the order in which they are presented.

Q i) *Does either DPD fail any tests for legal compliance?*

The DPD does not fail any tests for legal compliance.

Q ii) *Are the draft allocations on the Site Specific Proposals DPD. collectively, "consistent with" national policy, particularly in PPS 3 (Housing) and PSS 4 (Planning for Sustainable Economic Growth)?*

The DPD is overall "consistent with" PPS 3 and PPS 4. However, both the PPS 3 policy changes introduced on the 9th June have considerable significance for North Norfolk, which unless addressed as part of a wider review, could see a further increase in the allocation of greenfield sites in the District, which is already too high to sit with Core Strategy Policies EN 1 and EN 2.

Up to now the District has met planned housing provision without making any land allocations for this purpose. During the first 8 years of the plan period completions were derived entirely from windfall developments (NNDC Statement of Five Year Supply, page 2). Many of these 'windfall' sites arise from garden infill, as indicated by the County Housing Monitor Report of April 2008- March 2009. The annual completions on Previously Developed Land (page 21) show North Norfolk to have 70-90% of all completions on PDL, the only district in the county to run close to Norwich. The removal of gardens from the PPS 3 definition of PDL will have an impact on the amount of build from this source in the future.

It should be noted though that the North Norfolk AMR 2008-09 table 4.3 shows that the 'minimum' additional 8,000 dwellings for 2001-2021 is in fact estimated to be 9,818 dwellings; the contribution from windfall development, including rural building conversions and 'exception' sites amounts to 1,757; and so excluding even all of this number, the total planned dwellings would be 8,061 - above the 'minimum'.

The second change in PPS 3 policy is the removal of a minimum density build of 30 dwellings per hectare. This affects Core Strategy Policy HO 7, and the number of dwellings that might be accommodated on a major greenfield site. HO 7 aims for a minimum indicative figure of not less than 40 dwellings per hectare in Principal and Secondary Settlements. The change will reduce the provision of affordable housing sought from Policy HO 2, which looks for all schemes of 10 or more dwellings to provide not less than 45% of the total number of dwellings proposed are affordable.

Q iii) *Do they “conform generally” with the regional spatial strategy (East of England Plan)?*

The draft SSP does “conform generally” with the RSS, and specifically on allocating sites on the basis of the ‘minimum’ of 8,000 additional dwellings in the plan period.

Q iv) *Will the proposed allocations deliver the stated objectives of the North Norfolk Core Strategy?*

The proposed allocations will not meet the stated objectives of the North Norfolk Core Aim 1, to address the housing needs of the whole community; and there is a significant degree of conflict with Core Aim 3, to protect the built and natural environment and local distinctive character.

The delivery of affordable housing is particularly acute in North Norfolk. There is a differential between average salary and average house price of some 7-8 times; North Norfolk ranks as 4th highest local authority for number of second homes in England, and they account for 9% of all homes in the District; there are also a significant number of dwellings used for holiday let. The Council rightly gave a high political importance to addressing the pressing need for improvements in the provision of affordable housing. Anecdotal evidence indicates those hardest hit may be in work and without the sufficient income to rent or buy locally, and without enough points to gain a high social need rating which would see them into social housing.

In the period 2001/02 to 2008/09 the provision of affordable housing as a proportion of all housing was 18%. The share of affordable housing that was wholly or in part funded by developer contributions amounted to just 9.6% of the 544 total. Funding from RSL and/or the Council yielded 492 dwellings, 90.4% (NNDC AMR, page 16). This experience was a powerful driver to allocating in the SSP large greenfield sites, and looking to a 45% contribution on these for affordable housing (the other main reason was to focus development to better stem the loss of local services).

However the fall-out from the recession is producing evidence to show that planning gain, which requires a scenario of continually rising land and house values, is not sustainable in delivery terms as well as environmental terms.

South Norfolk has been heralded in the media as an exemplar for provision of affordable dwellings, on the basis of figures for 2008-09. However the County Council Housing Monitor Report (page 8) shows a housing trajectory which fell from over 500 to less than 400 total completions per year to 2005-06, with an annual average of 55 affordable dwellings (from table 3, page 24), around 10%. Housing completions then rose sharply to a peak of 1200 in 2007-08, which included 300 affordable dwellings (25%). Total completions fell to 925 dwellings in 2008-09, but

within this the affordable delivery rose to 490 units. This is presumably because on large greenfield sites the affordable element tends to lag those built for private sale. 'Balancing' the two years, we have 790 affordable dwellings from 2150 completions, a 37% proportion of affordable in the overall total. While this shows that a high yield can be obtained from a large greenfield site, this is only possible at the tail-end of an unsustainable boom which leads to a crashing 'bust' and an economic environment which makes it difficult for the provision of both private, and most certainly, affordable housing. As the Housing Monitor Report notes, the county annual housing completions dropped by 32% in 2008-09, following the peak year of 2007-08.

Given the need to strike an appropriate balance between the delivery of private and affordable housing in accord with Core Aim 1, and Policies SS1 and HO 2, the allocation of large scale greenfield sites is not sound or effective; plus it will make it more difficult to use smaller and PDL sites with the inevitable cherry picking by developers until the recession has receded, and done so for some time.

Q v) *In the light of the Core Strategy, has the correct/appropriate amount of development been allocated within the DPD and in each settlement?*

In the light of the Core Strategy the appropriate amount of housing development has been allocated - some 50% in the Principal Settlements and 20% in Secondary Settlements. This balance is not upset by the changes in PPS 4. There is in our view potential for a greater uptake of PDL for housing, including by some re-allocation of proposed retail sites all or in part to housing.

Q vi) *Is it essential to make so many greenfield allocations, both at the towns and villages, or are there preferable PDL alternatives, at least on smaller sites?*

The allocation of large greenfield sites is not an efficient route to the provision of affordable housing as argued in (iv) above; and this is not helped by relaxing the density restrictions. There is considerable potential for PDL, even as now defined by PPS 3, to be brought forward. This should be accompanied by an improved delivery over the plan period to date of 18% affordable housing, which would be aided by a greater injection of finance from central Government; although not it seems on the immediate horizon, it would also help to maintain a construction industry.

Q vii) *Is it necessary to allocate sites in/affecting the Norfolk Coast AONB?*

The above case applies most of all to sites adjacent or within the AONB. The selection of large greenfield sites in Sheringham, Cromer and Wells are driven by the aim, which it is clear now will fail badly, of obtaining some 45% of the housing as affordable housing. In the current economic conditions and for some years to come, these would see development of private sale housing, some on large plots, with even a very modest delivery of affordable housing being declared as 'non-viable'.

Monies that might come from the CLG to close the gap in shortfall from developer contributions towards affordable housing would be much better directed to housing associations/Councils. Council owned land should be brought forward for affordable housing instead of other uses, such as the Cromer Road site in Sheringham, proposed for a supermarket. The SSP proposals of large greenfield allocations around these towns will set in train the progressive move of the settlements into the AONB, with a risk of a continuous erosion of the AONB boundaries.

Q viii) *Do any of the allocations have unacceptable impacts on/implications for designated European, national or local wildlife sites?*

The Glaven catchment is over-licensed and the Stiffkey catchment over-abstracted. It is hard to believe that water dependent sites of nature conservation are not under increasing pressure from a combination of factors: over development from housing, and from tourism; and the necessary requirements from agricultural irrigation, and from climate change.

Domestic consumption from residents peaks in the summer, and more so that from second homes and tourism, and likewise for irrigation, although there is an increasing trend for agriculture to abstract in the winter months, with storage in reservoirs for summer use. The peak for water consumption occurs at the time the natural environment comes under most stress, particularly in a drought year, or worse two successive drought years. This applies to SAC sites such as Beeston Regis Common, Holt Lowes and Southrepps Common; and the River Wensum and the Norfolk Coast sites. Very importantly, it applies also to a number of CWS and the wider countryside.

Q ix) *Are the individual housing allocations available, suitable, and achievable (ie “deliverable”), in terms of PPS 3, such as to deliver a 5 year land supply?*

There is a basic problem with PPS 3 and the allocation of land to ensure a 5 year supply, which is locked into a 20 year timescale target. Is it reasonable if the first ten years of the plan struggle to meet a housing provision ‘minimum’ target and the assumption is then that the ‘under-achievement’ be carried through to a higher average annual target for the remainder of the plan period to ‘catch-up’? Is it reasonable to do so when the original target figures were based on some major assumptions on the net level of national in-migration and reductions in average household size which look even more ‘shaky’ now than when they were made? Further, it is it sensible to carry on with unchanged long term targets if they were generated in a boom period, which turned into an unforeseen recession that will likely last for the next five years, which sees us three quarters through the 20 year plan?

Our answer to these questions is ‘no’, and that it is more realistic, effective and ‘sound’ to re-assess the long term targets, and the housing trajectory, and what that means for a ‘five year supply of land’ and the allocations that are needed for the next 5 and ten years. Given the likelihood of the (lack of) availability of private and public finance over the next five years, it would be sensible to plan and prepare for a much lower figure than has been achieved in the period 2001-02 to 2008-09.

In this period in North Norfolk 2,872 dwellings were completed to give an average annual build of 359 dwellings (Statement of Five Year Supply of Housing Land: April 2009-March 2014). It does not make sense to say that for the second half of the plan period ‘catch-up’ dictates that we then work to an average annual completion of 427 dwellings, a 19% increase in ‘bust’ over ‘boom’ periods.

At least for the next five years it would be overly ambitious to look for more than 300 dwellings a year. In that case, the identified supply in the schedule appendix A of sites for 1,790 dwellings would provide a supply for 6 years. It is not ‘sound’ to consider the further allocation of sites without a detailed re-assessment of factors brought to light by the recession.

Q x) *Is there a reasonable prospect of the remaining allocations being developed within 15 years?*

The Core Strategy conforms to the RSS by running to 2021. The RSS review to 2031 will be aborted, although the amended version of PPS 3 (paragraph 53) still says LPAs 'should also have regard to the level of housing as proposed in the relevant emerging Regional Spatial Strategy'. We suggest it should do no more than that and look afresh in the context of the reality of the current economic situation, and that it would be wrong to let housing for private sale run further ahead of the delivery of affordable housing. With regard to paragraph 55, the evidence base required to 'identify specific sites for years 11-15' is incomplete; and that the 'broad locations for future growth should be indicated' still raises issues to be resolved on how much growth beyond 2021, and the relationship to environmental constraints.

CPRE argue that a sufficient evidence base to do even this is not available. A best guess might be for years 11-15 growth to be located mainly in the areas of Fakenham and North Walsham, assuming constraints on water resource and waste water management are resolved. These locations will be best placed to deliver some PDL, and minimise pressures on the AONB. The national and Core Strategy target of at least 60% of completions on PDL will be more difficult to approach without the contribution of the windfall garden sites of past years.

Q xi) *Are the other allocations (employment, retail and other) appropriate and deliverable, and consistent with PPS 4? If not, why not, and does that make the DPD "unsound"?*

The allocations are compatible with PPS 4, and are not 'unsound'. However, we are not convinced that the retail allocations are appropriate. Retail and the assessment of the need for growth is dominated by the large multiples and the consultants who work in this area. There are two issues in assessing the longer term need for land usage:

- (1) Will the UK continue to be such a strongly consumerist society, with retail as well as housing being so dominant in the national economy?
- (2) Will internet shopping see a decline in the need for large scale retail sites, for businesses which generally offer no personal service and little uniqueness in goods?

Some of the allocated sites might be better in part or whole to be used for housing.

Q xiii) *Are any of the allocations subject to any demonstrable and overriding infrastructure constraints (esp. water/sewerage/drainage; education; highways) which can not be overcome by planning conditions and/or obligations?*

The constraints for waste water treatment relate to the capacity of a plant to accommodate the amount to be processed and of the rivers into which they discharge to accommodate the level of nutrients they will receive. The latter have received attention under the Habitats Directive, as in North Norfolk two of the receiving water courses, the River Wensum and the Broads, are internationally important wildlife habitats which are subject to specific protection.

Paragraph 3.7 of the Water Infrastructure Statement which accompanies the draft SSP makes an important point about the impact of the Water Framework Directive (WDF): **It should be noted that the Appropriate Assessment only considered potential impacts on sites designated under the Habitat Directive. The WDF (which considers the wider water environment) was not considered or discussed in any**

great detail as part of the Core Strategy but it is now a key issue when considering the impact of growth on water quality’.

On the question of can the proposed growth be accommodated within the existing volumetric consent of the relevant Waste Water Treatment Works (WwTWs) the results appears to indicate that there is sufficient headroom within existing consents to accommodate the full growth proposed in all the settlements except for Fakenham and Holt, and in summary all but 50 of the dwellings proposed at Holt and 221 at Fakenham, without the need for new discharge consents (paragraph 4.10), which represents 82% and 91% of the proposed housing figures for Fakenham and Holt respectively.

This appears to be based on the assumption that future implications of the WFD do not require a tightening on the phosphate level in waste water. More immediately critical is that these conclusions (see Table 3, Appendix 1) are made on the proviso that **there was no employment growth**. This implies that the long term trend of housing being occupied by in-migration of the economically non-active approaches becomes the norm. This would clearly work against Core Strategy Policy SS 5, which looks for 4,000 additional jobs between 2011 and 2021, with allocations of employment land including in Holt 15 hectares, and 59 hectares in Fakenham.

We ask also whether there is really ‘headroom’ in existing consents affecting other settlements, given that the employment land total for the District is 204 hectares; and the rest of the 4,000 jobs in tourism and retail, which are scattered around the District. Finally, is the expected increase in the number of visitors coming to the District accounted for in the assessments. At the same time as water resource is most pressed in summer, and river flows are at their lowest, the discharge from sewage treatment works is highest, giving the greatest concentration of nutrients in the receiving water bodies at this time.

In the case of Fakenham, which discharges into the Wensum SAC, it is suggested that there might be merit in diverting part of the STW discharge into an alternative water body, namely the River Stiffkey. The Holt STW discharges into the River Glaven. Both these rivers also receive discharges from a number of other settlements, some at least already at the limit of capacity. We ask whether there has been a ‘whole river’ study as to what goes in where and how much, and the individual and cumulative loads assessed, for the Glaven, Stiffkey and Wensum.

Both the Glaven and Stiffkey are chalk streams and as such are Norfolk Biodiversity Action Plan priority habitats. Both flow into the North Sea, and the nutrient load can impact on the ecology of coastal waters. Both are home to a number of protected species, and the Glaven matches the Wensum in this regard. The species include the white-clawed crayfish (not as yet lost to the non-native invasive signal species), brook lamprey, bullhead and stone loach; and otter and water vole; and water crowfoot, starwort and other aquatic plants. The value of the importance of chalk rivers is brought out in Policy EN 9 of the Core Strategy, the support text and the accompanying Appendix B on the North Norfolk Ecological Network.

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CPRE Norfolk, 27th June 2010.

