

LOCAL PLAN – PROGRESS UPDATE ON SITE SELECTION OPTIONS - DEFERRED SITES

Summary: This report provides an update on sites which were previously considered for allocation and which were deferred for a variety of reasons.

- Recommendations:
- 1 **That the following sites be retained as allocations in the proposed Submission Local Plan:**
 - **Mundesley MUN03/A - Land off Cromer Road & Church Lane**
 - **Blakeney BLA04/A Land East of Langham Road**
 - 2 **The final policy wording is delegated to the Planning Policy Manager**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
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1. Introduction

- 1.1 At previous meetings of the Working Party the Planning Policy Manager presented reports and site assessment booklets relating to proposed allocations for Holt, Mundesley, and Blakeney. He outlined the main issues relating to each settlement and recommended sites for inclusion in the Local Plan, ahead of Regulation 19 consultation and subsequent submission to the Secretary of State for examination. In a small number of cases the Working Party resolved to defer consideration, and in the case of site selection at Blakeney Cabinet has requested that the Working Party reconsider its previous decision.
- 1.2 The purpose of this report is to revisit these sites and to update members on the latest position.

2. Holt - Site H04 – Land South of Beresford Road

- 2.1 At the meeting of the Working Party held on 15 June 2020 the report identified suitable, available and deliverable sites in order to meet the identified need in Holt including for housing, a new primary school and additional employment land. All proposed sites were agreed with the exception of site H04 at Beresford Road due to a number of concerns including the suitability of site access arrangements and the likelihood, or otherwise, of school delivery. As members will be aware this site is also subject to a planning application for housing and a new primary school (the Gladman proposal) which has been refused planning permission and is subject to an appeal. A public Inquiry has been held but currently there is no indication as to when a decision might be reached.

- 2.2 Pending a decision on the appeal officers have not commenced work on alternative options given that the outcome of the appeal will largely determine if there is a need to consider alternative sites. It is hoped that the position will become clearer early in the new year to allow for this issue to be reconsidered by the Working Party.

3. Mundesley - Land off Cromer Road & Church Lane (MUN03/A)

3.1 At the meeting of the Working Party held on the 1 June 2020 site MUN03/A Land off Cromer Road & Church Lane was identified and recommended for inclusion in the Local Plan for residential development.

3.2 Members expressed concern that the possibility of development on site MUN03 had already been discounted twice on landscape grounds when the previous local plan was being prepared. It was felt that the development of 50 homes would block the view of local heritage landmarks, including the church, be visible for miles around and have a severe impact on the Victorian terraced properties at the bottom of the hill. Furthermore, the Parish Council had a scheme for 16 affordable dwellings on an alternative site that it wished to discuss. Members of the Working Party unanimously took the decision to defer the allocation of this site to allow for further discussions with the Parish Council.

3.3 A meeting was held with Mundesley Parish Council (MPC) on the 7 July 2020. MPC presented their desire to bring forward site MUN11 as an alternative for development to include affordable housing and self-build units. They indicated that such a scheme could provide allotments and new open space areas which would serve local needs more than the existing open land area.

3.4 Officers explained that MUN11 had scored negatively in the Site Appraisal process due to the loss of a designated open space land, and the potential loss of biodiversity. Officers also raised concerns over the deliverability of bringing this site forward especially if in line with the PC's ambition it was solely for affordable housing and self-build units. It was suggested that that there had been a misinterpretation around the existing policy context of the site. It was explained that in order to develop the site it did not require allocation – the site is already located within the development boundary of the village and therefore if the loss of open space issue could be addressed existing policies would allow for delivery of affordable homes in accordance with the Parish Councils' ambition. Such a proposal would comply with, and compliment, Mundesley's position in the proposed settlement hierarchy but would not negate the need to allocate land in the plan for housing growth.

3.5 It was suggested that MPC should progress site MUN11 outside of the Local Plan process, confirming that the emerging policy context also would not stop the PC as the landowner from bringing forward the site for market or affordable housing in line with its ambitions if they were able to address the loss of open space issue. Housing colleagues have subsequently contacted the PC and reaffirmed their willingness to support the PC in developing the site and finding a potential registered provider should they wish to progress.

- 3.9 During the meeting it was confirmed that MPC have no objection to the principle of some development on site MUN03/A or the view that a reduced number of 30 dwellings, rather than the 50 previously proposed, positioned on the lower section of the site was more appropriate. Given the prominence of the elevated section of the

site and the perception that higher density development could impact on surrounding views as well as heritage considerations it was thought that the housing requirement could be reduced.

3.10 Historic England do not object to the proposal on heritage impact grounds provided the policy contains the following criteria:

- Development should conserve and where appropriate enhance the Mundesley Conservation Area and grade II listed All Saints Church.

3.11 The subsequent Historic Impact Assessment undertaken by officers concurs with the advice given by Historic England. The above criterion has been included in the amended Policy, and the allocation reduced to 30 residential units in order to respect the visual importance of the landscape and the character of the historic environment. On this basis, the allocation of MUN03A for approximately 30 dwellings is recommended.

4. **Blakeney**

4.1 At the 13 July 2020 meeting of the Working Party it was recommended that members endorse site BLA04/A for inclusion in the Local Plan. Members resolved to endorse an alternative site BLA01/A. This decision resulted in local objections and when presented to Cabinet for ratification Cabinet resolved that the matter should be considered again by the Working Party.

4.2 In light of the debate at the Working Party both promoters of the alternative options were asked to provide further information in relation to what could be delivered on each site and its impacts. Both have now provided:

- Viability Assessments – these are based on assumptions about how the sites might be developed for a mixed housing scheme of approximately 30 dwellings. Both conclude that development would be viable and could deliver 35% affordable homes in accordance with policy requirements.
- Indicative layout drawings. These show 'potential' developments, they are not formal proposals and the Council is not being asked to reach a view on the acceptability or otherwise of these specific schemes. They should be regarded at this stage as illustrative feasibility plans.
- Landscape Impact Assessments.

4.3 These documents have been circulated to Members of the Working Party and parish council. In addition to submissions made by the site promoters there have been representations by local residents (also circulated to Members). This information will be presented in further detail at the meeting.

4.4 All potential allocations have been subject to a standardised assessment process which is designed to assess the overall sustainability of proposals. It requires consideration of a range of criteria which consider such matters as proximity to day to day services, technical matters such as access, degree of constraints such as flood risk, and the impacts of development in relation to issues such as wildlife and landscape impacts. The process does **not** select the sites for allocation, it provides a systematic process for comparing sites, but the final selection still requires the exercise of planning judgement and the weighing of considerations. For example, it may be that a particular proposal is assessed as having an adverse landscape impact but that the benefits of the proposal outweigh those impacts.

4.4 Sites BLA/01A and 04A perform in similar ways in the assessment process (Extract below). Both are edge of settlement locations, involve development of greenfield land, are located similar distances from key services, and both are technically capable of being developed. However the assessment concluded that BLA04/A had a lesser impact on landscape character and it was mainly this factor which led to it being recommended at the previous meeting.

4.5 The details now submitted by the promoters of BLA/01A (Oddfellows) show fewer dwellings (30 instead of the 91 previously appraised), confirmation that access could be provided to Langham Road, and the inclusion of an area of public open space. This revised proposal has been re-appraised and given a new reference BLA01/B. It remains the case that with the exception of landscape impacts, where BLA04 is judged to be less harmful, the schemes are comparable across the assessment criteria.

4.6 The landscape character around Blakeney is one which is largely determined by its coastal location and views towards the sea over the marshes are critical to the landscape character and setting of the village. Blakeney Church is also a well-known local landmark and is a prominent feature from many vantage points. Both sites will have a landscape impact but Officers remain of the opinion that site BLA04A represents the less harmful of the potential options. Development on BLA04A is considered to be well related to the built up area of the village, it does not represent a significant incursion into the countryside and will mirror the recent development that has already taken place on the opposite side of Langham Road. Important views of the Church will remain.

5. Recommendations

1. That the Working Party recommend to Cabinet that the following sites be retained as allocations in the proposed Submission Local Plan:

- **Mundesley MUN03/A - Land off Cromer Road & Church Lane (reduced to approx. 30 dwellings)**
- **Blakeney BLA04/A Land East of Langham Road**

2. The final policy wording is delegated to the Planning Policy Manager.

6. Legal Implications and Risks

6.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy and proposals each must be justified and underpinned by evidence, the application of a consistent methodology and demonstrate how public feedback has informed the Plan.

It is essential that site allocations can be justified and are supported by a clear audit trail showing how sustainability objectives have been taken into account. Assessment must:

- Take account of national planning principles;
- Be transparent;
- Enable a consistent basis for comparison between sites;
- Enable unsustainable sites to be filtered out and development to contribute to the delivery of sustainable growth.

- 6.2 If the above process is not followed, then there is a risk of sites being found to be unsound and unjustified at examination, which would require more work and could result in further delays to the local plan adoption process.
- 6.3 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22 and also requires that a sustainability appraisal has informed the production of the Plan.

7 **Financial Implications and Risks**

- 7.1 Failure to undertake plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.