

## Local Plan Site Allocations

Summary: To seek agreement on the way forward for site allocations in the draft Local Plan particularly in relation to the final selection of sites at Cromer.

Recommendations:

- 1. That the Shell Petrol Filling Station Site at Fakenham is included as a proposed allocation in the Regulation 19 Plan.**
- 2. That, in light of the Gladman Appeal decision no further allocations are made in Holt.**
- 3. That officers investigate, on a without prejudice basis, an enlarged allocation at Norwich Road, Cromer**

Cabinet Member(s)	Ward(s) affected
Cllr J Toye	All
Contact Officer, telephone number and email: Mark Ashwell, Planning Policy Manager, mark.ashwell@north-norfolk.gov.uk Tel. 0263 516325	

### 1. Introduction

1.1 Over the last year the Working Party has resolved to allocate new development sites which would allow the overall housing target included in the Draft Local Plan to be met. A small number of decisions were deferred to allow for other options to be considered and some were conditional on further details being agreed. These were:

- The suggested allocation of land behind the Shell Petrol filling station at Fakenham (Sculthorpe Parish) – the Working Party resolved to allocate this site provided suitable access could be provided. Access arrangements have now been agreed to the satisfaction of the Highway Authority involving reconfiguration of access and forecourt arrangements to the PFS. On this basis, allocation of the site is now recommended.
- The choice of sites at Cromer, where a decision on the Clifton Park site was deferred to allow for the consideration of alternatives in the Roughton Road area of the town.
- A resolution to allocate the Norwich Road site at Cromer (the ‘Gurney’ proposal) which was subject to satisfactory resolution of highway issues.

1.2 In addition, for several months, the Council had been awaiting a decision on the ‘Gladman’ appeal at Holt. This has implications for both site allocations in Holt and for the Authorities overall approach to setting housing targets in the Draft Plan. As Members will be aware that appeal decision has now been received and the appeal has been allowed.

1.3 This report provides an update on these matters and seeks to reach final agreements in relation to Site Allocations in order to allow the Reg19 (pre submission) version of the Plan to be finalised for consultation.

## **2. Housing Target and Delivery (the Gladman decision)**

2.1 Members will recall that the process of establishing the housing target for the Plan has been subject to considerable uncertainty resulting from changes, and potential changes, to the national standardised approach which is required to be used to derive the local housing requirement. One of the key tests at examination will be whether the Plan provides a positive strategy to address all likely future housing needs over the duration of the Plan period so the Plans target will be subject to detailed examination.

2.2 It has previously been resolved to include a minimum housing target in the Plan which does not follow the standardised approach in national policy. Instead, the target in the Draft Plan relies on an alternative method based upon more up to date evidence of likely population growth, namely, the 2016 based national household projections, rather than the 2014 based figures which underpin the national methodology. The NPPF requires that any departure from the standard approach should only be used in exceptional circumstances. This was one of the central issues examined by the Inspector at the Holt Public Inquiry, namely - does the evidence in North Norfolk justify the alternative approach?

2.3 The Inspector concluded that the evidence supported the argument that a local variation was justified as the 2014 based Household Projections contain errors and consequently are not a reliable starting point for the calculation of future requirements. As a result, the Inspector confirmed the Council's case that it was currently able to show a five-year land supply. The Local Plan Inspector is not bound by this decision and may hear alternative evidence from others who do not support the Council's approach. Nevertheless, officers consider that the Authority is now in a good position to justify the approach taken to establishing the target proposed in the Draft Plan.

2.4 On this basis, the Submission Plan proposes a minimum housing target of 480 dwellings per year or 9,600 over the entirety of the 20 year plan period 2016-2036. Set against this minimum target the Plan then proposes a strategy to deliver around 11,500 homes – around 2,000 more than the minimum requirement. At Regulation 18 consultation some questioned the need for the Plan to include the higher figure.

2.5 The delivery buffer, or headroom, within the Plan will be critically important in demonstrating the Plans 'soundness' for a number of reasons:

1. Plan targets are expressed as minimums rather than targets not to be exceeded - A Plan which only proposed to provide the minimum target might be argued not to be positively prepared.
2. Whilst there is nothing in the Plan that seeks to hold back delivery of development on allocated sites it is the case that not all of the growth proposed in the Plan will happen within the Plan period. For example, significant elements of the two strategic scale sites at North Walsham and Fakenham are unlikely to be built out in their entirety by 2036. Clearly, such longer term growth should not be counted against the Plans target if it is unlikely to be built in the period covered by the Plan.

3. A further feature of North Norfolk's Plan is the inclusion of around 2,200 homes on windfall sites. Whilst the Council can be confident in this supply, which has been tested and is set at around 50% of recent rates, windfall development is regarded as a less reliable source than site allocations – a windfall is by definition a development site that is not identified.

2.6 For these reasons setting a minimum requirement of 480 per year and then producing a Plan to deliver 480 per year and no more, is very unlikely to be a sound, and is not the approach taken in the Plan.

2.7 The Holt appeal decision was also important in terms of the need or otherwise for the Local Plan to include additional development sites in Holt. Members might recall that the site had initially been identified as a potential allocation but it was removed from the Draft Plan when the planning application was refused. This resulted not only in a reduced quantity of homes in Holt but created the possibility that the Plan would need to identify a new site for the Primary School, which had been proposed on the site. As the Appeal has now been allowed there is no longer a requirement to identify additional land allocations in Holt either for housing or school provision.

### **3. Selection of Sites in Cromer**

3.1 Cromer is identified as one of the Large Growth Towns in the Draft Plan which requires land to be identified in the town (adjacent parishes) for around 600 dwellings. This number is much lower than both Fakenham and North Walsham, the other two Large Growth Towns, reflecting the degree to which growth in Cromer is constrained by the North Sea, the Area of Outstanding Natural Beauty designation and other constraints. Set against this, the town has amongst the highest numbers of people in housing need and the range of supporting services available is comparatively good.

3.2 Given this, it is strategically important that the town makes a significant contribution toward addressing the overall housing requirement and other development needs in the district and that sites are identified which are suitable to provide a land supply both early in, and throughout, the plan period. The Draft Plan included four sites:

**Land west of Pine Tree Farm** (the 'Gurney' site) – proposed to be allocated in the Draft Plan for 300 dwellings, elderly care and replacement football club facilities.

**Land at Cromer High Station** – A small site for around 20 units rolled forward from the existing adopted Plan. This site is now subject to a current planning application.

**Land at the former Golf Practice Ground**, Overstrand Road – proposed for approx. 180 dwellings.

**Land at Clifton Park** – proposed for approx. 90 dwellings

3.3 Collectively these four sites were planned to deliver around 600 dwellings, which is the 'target' for Cromer included in the Draft Plan.

3.4 At previous meetings Members have agreed the Overstrand Road and High Station sites, agreed the 'Gurney' site *subject* to access arrangements being resolved, and deferred a decision at Clifton Park to allow for consideration of alternatives in the Roughton Road area.

## **4. Updated Position**

4.1 Since these earlier resolutions there have been a number of changes.

- It now appears probable that the Gurney site would not be sufficient to accommodate 300 homes together with elderly care and football club facilities as the Draft Plan intended. The current planning application on the site suggests it may only be suitable for perhaps 250 units if the Authorities desire to deliver high quality sports pitch provision is also to be achieved on the site.
- Delivery of the Gurney proposal is contingent on providing a footbridge over the Cromer Road Rail line to provide a safe route to schools and town centre. The pending application offers this but it remains unclear if such a bridge is feasible within the land available and the impact providing this might have on the overall viability of the scheme.
- The Highway Authority has confirmed its view that any significant development served via Roughton Road is unlikely to be acceptable unless associated with proposals which provide direct access to Norwich Road.
- The proposals for Clifton Park which had originally been for around 90 dwellings and school site (Reg 18) have been amended to 55 dwellings and an elderly persons care facility.

4.2 In light of the above, and in particularly the reduction in numbers of dwellings which might be delivered across the four sites, it is desirable to investigate the identification of further opportunities for growth in Cromer in addition to those identified in the Draft Plan. In this respect, officers consider that an enlarged proposal off Norwich Road (Gurney/ Cabbell Manners sites) represents the best option for securing comprehensive development. For example, an enlargement of the Gurney site to include sufficient land to the west for a further 120 dwellings might assist with scheme delivery by improving viability and providing a more meaningful opportunity to provide sports facilities. Such a proposal would need to be formally tested with the Highway Authority to ensure suitable access could be provided to an enlarged proposal.

### **Recommendations**

- 1. That the Shell Petrol Filling Station Site at Fakenham is included as a proposed allocation in the Regulation 19 Plan.**
- 2. That, in light of the Gladman Appeal decision, no further allocations are made in Holt.**
- 3. That officers investigate, on a without prejudice basis, an enlarged allocation at Norwich Road, Cromer**