



North Norfolk District Council's response to:
Pre-Application Information Requested at Examination: Land
Adjacent Holkham Road, Wells (W07/01)

March 2024

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1. Introduction

- 1.1 During Week 2 of the Examination Hearings, at the request of the inspector, Armstrong Rigg Planning submitted a document in relation to the emerging Local Plan strategic allocation W07/1 detailing pre-application advice provided by North Norfolk District Council on an emerging site proposal. Further comments from relevant parties were subsequently invited.
- 1.2 Officers can confirm that the site W07/1 continues to be promoted by Holkham Estate as landowner and developer, which is evidenced by their response to the inspectors Matters, Issues and Questions [see [examination library](#) document EH011 (d)], and that pre-application advice was provided in response to a request from Armstrong Rigg Planning, dated 23/03/2023, as referenced within document EH011(d)(i).
- 1.3 This site is considered deliverable and suitable for development and is a proposed allocation in the submitted Local Plan. This response provides further context and also updates the position as detailed in the pre-application advice regarding the then emerging, and now, submitted, Wells-Next-the-Sea Neighbourhood Plan.

2. Assessment of Sites

- 2.1 W07/1 is a new strategic allocation proposed in the submitted Local Plan. The site was included within the Call for Sites process in January 2016 (HELAA Ref: H0699 - H1011 also applies to this proposed allocation), the details of which are set out in the Council's Housing & Economic Land Availability Assessment (HELAA) [D13-D16].
- 2.2 The initial assessment in the HELAA was positive. It identified no significant constraints to prevent development, and this led to the site being put forward along with potential alternatives for consideration through the Local Plan site assessment process, as detailed in the Development Site Selection Methodology Background Paper [C6]. This further and more detailed site assessment is provided within the Wells-next-the-sea Site Assessment Booklet [D8] on page 37 and compounds the site's suitability within the Sustainability Appraisal finding the site 'Positive', and the overall assessment (with input from relevant consultees) supported the site's connectivity and good access arrangements, as long as the access was provided from Mill Road.

3. Landscape Impact

- 3.1 The town, the location of the proposed allocations, along with the alternative options, and the surrounding area all lie within the Norfolk Coast AONB (now Norfolk Coast National Landscape) and the Council has provided a detailed response to matters, issues and questions proposed within Matter 5 regarding this issue and wider considerations as set out in NPPF para 177. The assessment of the site found it to be well-contained within the landscape and that a well-designed scheme that followed the proposed policy could have little detrimental effect on the environment and landscape where a policy compliant development could effectively mitigate any adverse impacts on the wider landscape.

3.2 In total, 14 sites were assessed at the second, more detailed stage of Local Plan assessment. The details of which can be found in the site assessment booklet. Of these 14 sites, 2 were proposed for employment uses and the remaining sites except for W07/1 and W01/1 were assessed as not suitable. Some of the key reasons for failure were due to the following:

- The sites were highly exposed within the AONB and development would result in greater impacts than other sites resulting in an adverse impact on the character of the area and on the wider landscape. As such they were not judged to meet the requirement of the NPPF, Para. 177 (September 2023 edition) in terms of the potential for detrimental effects on the environment as detailed in NPPF para 177(c), especially when compared to the alternatives.
- The sites were poorly related to the built form of Wells, specifically those sites found to the southeast of the settlement were considered to be in an unsustainable location due to their location in regard to services and facilities.
- The sites were exposed in the wider landscape. The landscape around Wells undulates and a number of sites, especially those found to the southwest of the settlement (e.g. W12 & W13) are considered to be quite prevalent in the wider setting and would be detrimental to the open and rural character of the area, more so than the two proposed allocations being provided in the Local Plan.

3.3 Without the two proposed allocations, it is considered that there are no other options available that can be considered suitable for development.

4. Access to Mill Road

4.1 At Regulation 19, the proposed allocation provided within the Local Plan did not include a visual indication on the policies mapping that the site would require access from Mill Road given the site's boundary did not abut the road. There was some concern within representations received during the Regulation 19 consultation period regarding where access would be required, in light of this and to ensure clarity and compliance with Criterion 3 of the site-specific policy, the Council have proposed a modification (PMIN/17.2/04) to the site's boundary which includes a visual amendment to the site boundary to identify that the access into the site will be from Mill Road. This was agreed to by Holkham Estate through a signed Statement of Common Ground (as included within Holkham Estate's Matter 5 response [EH011 (f)]).

5. Neighbourhood Plan

5.1 Since the pre-application advice was issued, Wells-next-the-sea Town Council have submitted their draft Neighbourhood Plan for examination. The examination commenced on 3rd January 2024, and a report containing the examiners assessment against the Basic Conditions and recommendations to the Council is expected shortly. The submitted neighbourhood plan includes a proposed allocation in order to meet additional growth outside that of the emerging Local Plan and is intended to be developed through a local Community Land Trust in order to meet local needs only.

- 5.2 The final draft Neighbourhood Plan continues to recognise and reference the emerging Local Plan strategic allocation and does also include a principal residency policy as stated in the pre-application advice. The final submitted neighbourhood plan policy, however, seeks to apply that principal occupation restriction only on new residential development outside of the emerging strategic sites. This reflects local circumstances and subsequent agreements made between the town council and the landowners, Holkham Estate, of both the Wells-next-the-sea Neighbourhood Plan site and the emerging Local plan allocation.
- 5.3 It is understood that this is in part to secure the release of a restrictive covenant on an emerging allocation for community led development proposed in the neighbourhood plan, and in part around further agreements between the two parties in the promotion of a higher than policy compliant amount / mix of affordable housing in any subsequent application (referred to as 'policy plus plus' approach in the pre-application proposal). The Council have indicated that it is supportive of this approach, which is predicated on the strategic policy requirements, local circumstances, and maximises affordable housing provision a material consideration.

11/03/2024