

## **Matter 5: Places & Housing Sites**

Issue: Whether the housing allocations, settlement boundaries and policy designations in the plan are justified and consistent with national policy and whether the site-specific policies for the allocations are effective.

### **Relevant Questions:**

*Standard Questions for each allocation:*

- a) Has the site been allocated previously or is it a new allocation?*
- b) Does the site have planning permission and/or are there current applications under consideration? If so please list.*
- 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?*
- d) Have the impacts and effects of development been properly taken into account?*
- 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?*
- f) What form would the public open space take?*
- g) Having regard to these components, is the estimate of site capacity justified?*
- h) What is the land ownership position and is the site currently being promoted by a developer?*
- i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?*
- j) Given the components of the proposal and the site requirements, would development of the site be viable?*
- 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?*

### **5.9 Wells**

*5.9.1 Are the detailed Settlement Boundaries for Wells, and the boundaries of the various Policy Area Designations (listed in paragraph 9.1.6 of the plan) suitable and justified given their policy function?*

*5.9.2 Are the housing allocations for Wells the most appropriate when considered against reasonable alternatives in the light of site constraints, infrastructure requirements and potential impacts?*

**Original representation summary:**

The Policy W07/1 and section 17.2 are unjustified and unsound as insufficient weight is given to the setting of the AONB and the undeveloped coast. In addition, the site has inadequate access, has poorly defined boundaries, would adversely affect the viability of the adjacent Mill Farm including its tourism enterprise and the housing mix proposed by the allocation fails to address any of the housing need of Wells.

**Examination Statement:**

My name is John Edwards, and I am a resident of Wells-next-the-Sea and a retired Chartered Town Planner and member of the Royal Town Planning Institute. My most recent active post was at Chief Officer level. Since 2020 I have been vice-chairman of the Wells-next-the-Sea Neighbourhood Plan Working Party. The Neighbourhood Plan was submitted to North Norfolk in July 2023 and is currently at 'Examination' which is due to formally begin on 3rd January 2024. <https://www.north-norfolk.gov.uk/info/planning-policy/neighbourhood-plans/wells-next-the-sea-neighbourhood-plan/>

My interest in this examination is principally centred around Wells and I raise a number of objections to the proposed allocation Policy W07/1 Land adjacent to Holkham Road and supporting text 17.2. My objections involve matters of principle and of detail.

**Objections to principle of development**

The parish of Wells next the Sea lies wholly within the Norfolk Coast Area of Outstanding Natural Beauty (recently renamed National Landscapes) and within the designated Heritage Coast. The allocation proposes approximately 50 dwellings which means that it constitutes a 'major development'. The NPPF gives great weight to the protection of Areas of Outstanding Natural Beauty (AONBs) and makes it clear that permission should be refused for major development other than in exception circumstances and where it can be demonstrated that development is in the public interest. Consideration of such applications should include an assessment of the need of the development, the impact of permitting it, the cost and scope of developing outside of the designated area and any detrimental effects on the environment, the landscape and recreational opportunities. The NPPF goes on to say that major development within a heritage coast is unlikely to be appropriate unless it is compatible with its special character. These assessments are equally applicable to allocations, and this proposal does not provide that compatibility.

In the case of Site W07/1 it is unclear how the decision as to the suitability of this site for development has been arrived at given the clear steer from the NPPF. Whilst the site assessments, accompanying the Local Plan do explore some of the issue there is no clear and compelling justification given for the allocation of this site against the NPPF or the proposed relevant policies in the Local Plan e.g. Policy ENV1, ENV2 and ENV 3. Other than making a general contribution towards an overall district wide housing target there is no justification given for the need for the development nor any public interest identified.

## Objections to detail

Notwithstanding the in-principle objections above, there are other issues as set out below that impact on the acceptability of the development of this sensitive Mill Road site.

### *Landscape:*

The site subject to Policy W07/1 is the most elevated and prominent undeveloped site in Wells in relation to the Area of Outstanding National Beauty and the associated ecologically and environmentally designated sites to the north. As such, its development is a very significant intrusion on the open aspect of the area to the north and west of the town. The allocation conflicts with a number of the proposed environmental policies in the Local Plan such as

Policy ENV 1 (AONB) : the site proposed in Policy W07/1, which is within the setting of the AONB, does not 'conserve and enhance' the valued landscape, or contribute to the matters included in section 4 a-c and f of the policy. Furthermore, it will have a 'potential adverse impact on the local landscape character' (section 5) and in the event it is included in the Approved Local Plan, the development should be informed by a Landscape and Visual Impact Assessment. Further, section 17 provides no logic for its site selection, and residential allocation; an analysis of the topography of the town would have highlighted the significance of the ridge running west-east from the high point in Mill Road through the centre of town and along Northfield Way. Development to the south of this ridge would provide greater protection to the integrity of the AONB and the associated designated reserves/sites. There are alternative possibilities, previously considered, that provide more appropriate solutions, e.g. west of Two Furlong Hill and, indeed, areas to the south of Warham Road.

Policy ENV 2 (Landscape and Settlement Character) : there is no evidence provided which justifies the contention that the development of this site will protect, conserve and enhance the Landscape Character, the distinctive settlement character, the visually sensitive skyline and the views into and from the AONB as required by the policy. As referred to in Policies ENV 1 and 2, W07/1 is unjustified as insufficient weight has been given to the unavoidable impact of the proposed development on the matters highlighted in para. 3.13.8 and 3.13.9, particularly on dark night skies. This site, given its prominence on the landscape and skyline, will be a major night-time intrusion.

Policy ENV 3 (Heritage and Undeveloped Coast) : Proposed allocation W07/1 lies north of the A149 shown as the boundary of the Heritage and Undeveloped Coast, the proposed allocation is unjustified in that the development fails to demonstrate both that it requires 'a coastal location' and that it 'will not be significantly detrimental to the open coastal character.' Again, other than a nominal contribution towards the overall housing target there is no specific justification given as to why an allocation of this size is required in Wells, given its environmental sensitivities and why this site is suitable in the context of those environmental constraints.

Form and character: The proposed allocation is unjustified as W07/1 represents a major visual intrusion of the built-up area of Wells into open countryside without the benefit of a clearly defined settlement boundary. Westfield Avenue to the east of the proposed development currently provides a hard boundary to the town; however, the boundary to the north of W07/1 is poorly defined and arbitrary and does not follow physical features on the ground and is subsequently difficult to formally delineate. A poorly defined development here opens the possibility to subsequent further development to the north and west; this is a significant consequence of the current proposal for the urban footprint of the town for which no justification or acknowledgement is presented. The existing 1930's ribbon development is an intrusion into the open aspect at the western edge of Wells when viewed from the north but, while it exists, it has matured and is largely assimilated into the landscape. The reinforcement of this intrusion by the development of Policy W07/1 is unjustified and damaging to this sensitive environment. This was recognised in the protracted considerations of planning applications for 106, Mill Road (PF16/0508 and PF17/2168 refer) on what was described as, albeit much smaller, a 'sensitive' site in relation to, inter alia, the AONB.

Access: the use of the access as proposed in W07/1 is unjustified without a survey of traffic flows in Wells and in particular on the B1105 and the A149. The access is taken from a section of the A149 which is subject to significant traffic, partly as a consequence of the Holkham Estate recreational activities, and is subject to gridlock several times a year, most notably on public holidays, when no vehicular access to the road is possible for the properties fronting Mill Road.

It is also unclear how the proposed allocation overcomes the concerns of the Highway Authority expressed as follows:

*'The previous Highway Authority comment supported the site subject to vehicular access at Mill Road only (with 90m x 4.5m x 90m visibility splays). 17.2.4 & 17.2.5 should be amended such that vehicular access is to be via Mill Road only. Notwithstanding, the W07/1 map is different to the Reg 18 version, it no longer includes a frontage at the highway and it is not clear how satisfactory access might be provided. Please revise as follows: W07/1 Allocation Plan – Show access route to Mill Road. 17.2.5 Constraints – Provision of suitable vehicle access at Mill Lane only.'*

Impact of viability: the viability of the site will be affected by the length of the new access road before it reaches the housing. This will further adversely impact on the cost of the market housing, given the relatively low density proposed; the resultant increased cost will have the tendency to move the market housing further away from the needs of the present community.

Layout: having the benefit of a consultation, as an adjoining landowner, on the developing planning application, the nature of the site has limited the development to a 'toast rack' layout running north/south and is completely insensitive to the organic and visually pleasing nature of the Town when viewed from the coast, the core of the AONB. Whilst recognising the constraints that viability has placed on the

development of the site, this harmful intrusion is a further reason highlighting the unsuitability for development of this most prominent site.

*Impact on Mill Farm:* Site W07/1 would remove the touring caravan/tenting site and reduce the only and much used livery facilities for residents and visitors, both facilities form a significant niche part of the Wells offer. It is understood that this would also have a significant impact on the viability of the farm unit.

*Housing:* notwithstanding the in principle objections to the development of the site, the proposal includes 50 residential units on the 2 ha. site; given the policy compliant split, this would generate 18 affordable units and 32 open market units. The open market units are unrestricted and therefore available in the open market potentially as second homes, holiday lets and at full market value, which is already in excess of the financial capability of the majority of Wells residents. Using the prevailing density of the Local Plan, base calculations for the affordable units would result in the open market housing being developed at 20 units per hectare. Housing of this type, on this prominent site, will not address housing need in Wells and district as identified in the Housing Needs Assessment: Wells, Holkham, Walsingham, Warham and Wighton March 2021 (previously supplied to NNDC), nor meet the aspirations of Wells residents as expressed in the public consultation on the developing Neighbourhood Plan held in October 2021 (Report previously supplied).

Para.17.0.1-17.0.7: this section 17 on Wells-next-the-Sea is unjustified and ineffective by the omission of two critical factors creating the stress in the housing market in the Town and district – these are high house prices and high levels of second homes ownership and holiday lets:

- the median house price is the highest in the North Norfolk District, and double the overall District level (£530,000 c/f £250,000 ONS March 2020),
- the level of second and holiday home ownership is up to 4 times higher in the Wells district compared to the overall District level; recent studies suggest it is approaching 40% of the housing stock.

Because of their omission, the Local Plan provides inadequate context or policy framework for the Neighbourhood Plan to address the challenges the town faces with regard to the provision of housing. Evidence compiled from the preparation of the Neighbourhood Plan indicates that there is a current imbalance in the property market in the town. Whilst new affordable housing is generally to be welcomed however will do little to address local needs in the town unless that housing is prioritised for local people via local connection rather than just to meet the general housing needs of the district. At the same time new unrestricted open market housing will only exacerbate this imbalance by potentially leading to more second homes and holiday lets rather than having the potential to provide for more locally specific market e.g. key workers.

Para. 17.0.1 - 17.0.12: are not justified and they are ineffective as they omit reference to the specific housing needs and challenges of Wells and omit the logic for site selection. Notwithstanding an apparent need for housing in Wells, there is little rationale as to the precise housing requirement for Wells and it appears that the

housing figures are more related to the potential capacity of the two sites chosen rather than meeting an identified requirement, which should be influenced by the environmental constraints of the parish. In short, the Local Plan as currently written does not adequately explain why further development is necessary in Wells. This is further reinforced by the changes in housing numbers on Site W07/1 between the Regulation 18 and Regulation 19 plans. Furthermore, there is no justification given as to why the two allocations chosen has been arrived at and more importantly how their development would be consistent with the national policies of restraint around the AONB and the Heritage Coast. The allocation should either be subject to a more rigorous assessment against the above factors or be removed from the Local Plan.

In summary,

- the site is an inappropriate location for development:
  - Because it represents a major development within the AONB and heritage coast which is not compatible with the special character of the designation nor is any public benefit identified.
  - Because of the impact of the development of this most prominent and elevated site on the Area of Outstanding Natural Beauty [based on the nationally significant coastal features], and as a detrimental intrusion on the Norfolk Heritage Coast,
  - Because the need for the development to be situated within a coastal location has not been demonstrated.
  - As it is damaging to the AONB by compounding the intrusion of the ribbon development on Mill Road [which has now matured and softened, becoming integrated],
  - As it is an extension beyond a clear, hard and understandable boundary to the Urban Area, and
  - In the context of the Urban area, there are alternative sites behind the ridge running east-west from Mill Road through to Northfield Waye and are less intrusive to the AONB and better related to facilities such as schools and shops.
- The nature of the development:
  - Introduces a 'toast rack' layout when viewed from the Wells Beach, the Holkham Lookout and the Norfolk Coast Path, which will adversely contrast and conflict with the random and compact form of the iconic views of the Town, and
  - Is contrary to the AONB and the 'Dark Skies' policies nationally, in the NNDC Local Plan and the developing Wells-next-the-Sea Neighbourhood Plan.
- In the event the residential allocation in the Local Plan is confirmed:
  - The development will be better accessed from Holkham Road [B1105] rather than from the heavily used Mill Road [A149], and will avoid both extending the intrusion beyond the existing and proposed built-up area of Wells and damage to the meadow providing the setting to the fine example of local farmhouses, Mill Farm House,

- The development should be low rise to reduce the impact of the intrusion, with shallow pitch dwellings, and single storey dwellings, and
- The layout should be less regimented, e.g. enabled by lower road standards.

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