

(4) **HOLT - PO/14/0846 - Erection of up to 170 dwellings and associated infrastructure; Land south of Lodge Close, Holt for Gladman Developments Ltd**

Major Development

- Target Date: 06 October 2014

Case Officer: Mr J Williams

Outline Planning Permission

CONSTRAINTS

Countryside

Unclassified Road

Controlled Water Risk - Medium (Ground Water Pollution)

Archaeological Site

THE APPLICATION

The application is in outline form with all matters of detail reserved for later approval.

It is supported by the following plans / documents:

Illustrative 'Development Framework' plan

Planning Statement

Design and Access Statement (including 'Illustrative Masterplan')

Affordable Housing Statement

Transport Assessment

Travel Plan

Landscape and Visual Impact Assessment

Arboricultural Assessment

Ecological Appraisal

Archaeological Assessment

Soil Resources and Agricultural Use Assessment

Land Contamination Report

Flood Risk Assessment

Foul Drainage Assessment

Utilities Appraisal

Socio-economic Sustainability Statement

Statement of Community Involvement

Also submitted is a list of Heads of Terms (S.106 Obligation) covering the following:

Affordable Housing

Open Space

Play Facilities

Public Footpath Links

Education

REASONS FOR REFERRAL TO COMMITTEE

At the request of the local Members, Councillors High and Baker for reasons of planning policy, access and local school capacity.

TOWN COUNCIL

Unanimous decision that the application should be refused due to the following:

- Access straight onto playing field
- Problems with access from small inadequate roads and also issues with a ransom strip needed from Victory Housing
- A very real fire risk, being situated so close to Holt Country Park
- Infrastructure issues
- This land could be better utilised for other purposes such as a new junior school

REPRESENTATIONS

14 individual letters of objection received on the following grounds:

- Increased traffic on Charles Road / Edinburgh Road.
- Beresford Road and Lodge Close insufficient to roads to serve the scale of development proposed.
- Road safety issues in relation to the nearby children's Sure Start facilities on Charles Road and play area on Lodge Close.
- Unrealistic assumptions made by applicants that residents will walk / cycle rather than use the car.
- Poor local public transport.
- Holt will lose its identity.
- Loss of open views.
- Loss of agricultural land.
- Will reduce appeal of Holt Country Park.
- Fire risk from surrounding heathland / Holt Country Park - land should be retained as a fire break.
- Potentially damaging to Holt Lowes Special Area of Protection (reduction of ground water / pollution)
- Impact on wildlife.
- Would be in excess of the planned number of dwellings for Holt.
- Unsustainable for the town.
- Density of development more suitable to a town rather than rural fringe.
- Lack of town centre parking.
- Strain on local school capacity.
- Strain on local medical centre capacity.

99 copies of a duplicate letter received citing the following grounds of objection:

Traffic

- overburdening of the present road network (Beresford Road, Lodge Close, Charles Road, Edinburgh Road).
- applicant's traffic survey only carried out for one day in October 2013.
- often considerable on-road car parking on Edinburgh Road.
- applicant's transport assessment ignores increased traffic impacts from the proposed Hempstead Road development.
- Unrealistic assumptions made by applicants regarding residents walking and cycling.

Planning Gain

- Bare minimum offered.

Housing Need and Supply

- The planned housing growth for Holt has been met.

Infrastructure

- Currently inadequate parking facilities in Holt town centre.

Education

- Holt Primary School and Sheringham High School are already at capacity and do not have room for expansion.

A petition with 85 signatures has been received objecting to the application until the development off Hempstead Road has been fully implemented and a reasonable period of time has elapsed to properly assess the traffic impacts upon Charles Road and Edinburgh Road.

CONSULTATIONS

Anglian Water - Confirms that there is at present available capacity in the foul sewerage network and at Holt Sewage Treatment Works to cater for the development. Requests a surface water drainage strategy is conditioned in the event of planning approval.

Environment Agency - No objection subject to a surface water drainage scheme condition being attached to any permission.

County Council (Highways) - Advises that a development of this size requires two points of access.

Two accesses are illustrated as being from Beresford Road and Lodge Close, however the access point from Lodge Close does not appear to be deliverable at present due to a strip of land between the end of Lodge Close and the site. Lodge Close at this point is also not adopted and whilst the Highway Authority is working towards the adoption of Lodge Close, this may not be for some considerable time. The applicant has stated that this will be resolved prior to any reserved matters application.

Should a reserved matters application be submitted with a single point of access from Beresford Road, the applicant would have to demonstrate that this was acceptable to the emergency services. In addition the road layout from a single point of access would need to be in the form of a loop with a short stub from Beresford Road. If a reserved matters application did not include two points of access or did not demonstrate the emergency services acceptance of a single point of access, the Highway Authority would object.

In addition a development of this scale, in this location, should contribute towards the local hopper bus scheme. For 170 dwellings this will be £60,000 and should be secured by a Section 106 Agreement.

Given that this application is an outline application with all matters reserved, the Highway Authority raises no objection subject to a condition requiring full details of highway / access proposals.

County Council (Planning Obligations Co-ordinator) - Response relates to education provision/contributions, library and fire service contributions.

In terms of education advises that a development of 170 dwellings would generate the following need in terms of child places:

Nursery School	-	16
Primary School	-	44
High School	-	29
6th Form	-	3

Currently there is the following spare capacity:

Nursery provision	+188
Holt Primary School	+19
Sheringham High School & 6th Form	+49

However, other approved developments in Holt will generate the following additional child place numbers:

Nursery	-	44
Primary School	-	118
High School	-	78
Sixth Form	-	8

The current proposed development in addition to these other developments would generate an additional 163 Primary age children. There would be insufficient places at the local Holt Primary School for children from this proposed development should it be

approved. The current school site, which is a split site and thus restricted in construction opportunities, is not large enough for expansion to accommodate children from this number of houses when taken together with other approved/planned development in the area. "We would have serious concerns about any further development outside any published Local Plan in Holt without being given the opportunity to understand the strategic options for meeting future pupil place demand".

If the District Council is minded to approve the application the following contributions will be sought to mitigate the impact of development:

Primary School: 44 x £11,644 = £512,336

High School: 29 x £17,546 = £508,834

6th Form: 3 x £19,029 = £57,087

Total education contribution = £1,078,257

In addition payments are required for library provision (£60 per dwelling) and fire hydrants (£892 per hydrant per 50 dwellings).

County Council (Minerals and Waste) - Comments that the application site is underlain by an identified mineral resource (sand and gravel) which is safeguarded as part of the adopted Development Plan for Norfolk, through the Norfolk Minerals and Waste Core Strategy policy CS16 'Safeguarding'. The site is also close to current sand and gravel workings along Norwich Road, and therefore the likelihood that mineral resources underlying the area covered by the application is viable is greater than if this were not the case. A Mineral site specific allocation (MIN 71) is located approximately 75 metres from the site. A Mineral Consultation Area extends into the application site 250 metres from the boundary of the mineral allocation.

Consequently the County Council in its capacity as the Mineral Planning Authority (MPA) objects to these planning applications unless:

1. the applicant carries out investigations to identify whether the resource is viable for mineral extraction,
2. if the mineral resource is viable, the applicant considers whether it could be extracted economically prior to development taking place,
3. the applicant carries out assessment to take into account any effects that may occur from the mineral extraction allocation MIN 71 to ensure that effective mitigation measures could be put in place to prevent unacceptable impacts on the amenity of prospective residents.

Further comments awaited following the applicant's suggestion that the issue of mineral extraction from the site could be dealt with by a planning condition.

County Council (Historic Environment) - Recommends that if outline planning permission is granted, conditions are imposed for a programme of archaeological work in accordance with National Planning Policy Framework para. 135.

NHS England (NHSE) - Response awaited.

Environmental Health - Recommends conditions in relation to land contamination, lighting, surface and foul water drainage.

Strategic Housing

Advises that there is a need for affordable housing in Holt with 101 households on the Housing Register and in addition there are a further 110 households on the Transfer

Register and 648 households on the Housing Options Register who have stated that they require housing in Holt. The proposed development would therefore assist in meeting some of the proven housing need.

The applicants have submitted a Design and Access Statement and Affordable Housing Statement. There is a conflict between these two documents with regard to the applicant's proposal in respect of affordable housing. The Design and Access Statement states that the site will provide "...up to 170 dwellings which includes 76 affordables (45%) and 94 market (55%)." However, the Affordable Housing Statement whilst acknowledging the considerable need for affordable housing in North Norfolk proposes that 30% of the total number of dwellings would be provided as affordable housing.

The applicant has not submitted a viability assessment to demonstrate why it is not viable to provide 45% of the proposed dwellings as affordable housing. There is therefore no basis on which to accept the applicant's proposal that 30% of the dwellings are affordable. On outline applications such as this, it is more appropriate to address any issues of viability at reserved matters stage. If this application was approved, a Section 106 Agreement should be completed which will require that 45% of the dwellings are provided as affordable housing, subject to viability. This ensures that the Council's policy requirements are clear whilst also providing flexibility to address any future viability issues with the site. The applicant has stated in the Affordable Housing Statement that it would want the affordable housing requirements secured through condition, but a Section 106 Agreement will provide more certainty and clarity of the Council's requirements.

To conclude, the Housing Strategy team will object to approval of this application if it only provided 30% affordable housing as no justification has been submitted of why it is not viable to provide the policy amount of 45%. As this is an outline application, if approved, a Section 106 Agreement should be completed which will require 45% affordable housing to be provided on the site, subject to viability. This will enable any viability issues which would affect the level of affordable housing which the site is viable to provide to be addressed as part of a reserved matters application.

Landscape Officer - As the site is bordered by Holt Country Park to the south and east and existing housing to the north, the visual impact of the development will be localised. The site is currently an arable field on Grade 3 agricultural land divided by a hawthorn hedge. It is located within the 'Wooded with Parkland Landscape Character Type' as defined in the North Norfolk Landscape Character Assessment (June 2009 SPD). This document states that due to its relatively level topography and enclosed land cover, any expansion of Holt to the south is considered, to result in less impact on landscape character than development to the north or west of the town. The conclusions of the submitted Landscape and Visual Impact Assessment that there will be no significant harm to the landscape character of the area and the visual effects of the development will be confined to the immediate setting of the site are concurred with.

The Glaven Valley Conservation Area wraps around the site to the south, west and east. Given the location of the site adjacent to existing housing and degree of visual containment, it is not considered that there would be any significant harm to this designation.

There is concern that the development of the site could impact upon the hydrology of the nearby Norfolk Valley Fens Special Area of Conservation (SAC) / Holt Lowes SSSI, as well as result in increased and potentially harmful visitor pressure upon this designation.

Natural England - Refers to the proximity of the proposed sites to both national and international designated habitat sites which are afforded protection under the 'Habitats Regulations'; namely the Holt Lowes Site - SSSI (national) some 500m distance from the site and the North Norfolk Coast Special Protection Area (international) some 5km distance, and the issue of visitor pressure from new residential developments which may impact upon the sensitivity of these sites.

"The Habitat Regulations Assessment of the North Norfolk Site Allocations DPD concluded that Adverse Effects on the Integrity (AEOI) of the North Norfolk Coast SPA/SAC/Ramsar as a result of increased recreational disturbance could not be ruled out without a monitoring and mitigation strategy in place. We understand that the intention was this plan would be in part secured through the collection of developer contributions, suggested to be £50 per dwelling, to be secured through S.106 agreements. This approach should enable a considered strategic approach to be taken, minimising and managing the impacts to the North Norfolk Coast and ensuring compliance with the requirements of the Habitat Regulations, however it is only as strong as its implementation.

The applicants suggest within their Ecological Appraisal report that they believe the provision of open space they are proposing and proximity of existing accessible natural greenspace should be sufficient to be exempt from this contribution. Whilst there is some green infrastructure proposed, the amount and layout is somewhat unclear differing between documents submitted with this application. Furthermore whilst we accept that residents are more likely to use the adjacent Country Park to meet their recreational needs, this additional usage will increase recreational impacts, such as path erosion littering etc within the park and no provision is being made for this. Whilst the Country park is not designated, it is linked to the Holt Lowes Site and its functionality and attractiveness is important in attracting people who may otherwise visit a designated site. It is therefore important to ensure this continues to be of a high quality.

It is the view of Natural England that whilst recreational pressure is addressed to a degree, it is inappropriate for the developer to suggest an existing site provide mitigation for impacts to internationally designated sites without directly contributing towards its ongoing management."

Concludes that there is currently not enough information to determine whether the likelihood of significant effects on designated sites can be ruled out. Recommends that the following information is obtained to help undertake a Habitats Regulations Assessment:

- Confirmation of intended site design, specifically clarification about green infrastructure provision and layout.
- Commitment to contribute towards maintaining the condition of the Country Park to ensure its quality is maintained even with additional visitor pressure resulting from this application, such that it can continue to function as an attractive 'alternative to the designated sites.

Further comments awaited following the submission by the applicants of a Habitat Regulations Assessment (refer to 'Landscape and Ecological Impacts' in the Appraisal section of this report).

Countryside and Parks Manager - Although there are no details of dwelling sizes or detailed landscape proposals, estimates that the open space requirement will be around 1.3Ha. The illustrative map shows that this will be provided on-site.

Favours that of the bulk of the open space is situated next to the country park and also agrees with the enhancement of the existing vegetation structure associated with the site boundaries together with the potential pedestrian links to the country park.

Attenuation ponds will also provide a valuable wildlife resource especially if they are situated close to the country park.

Questions whether a landscape buffer along the northern boundary is really necessary. It will not contribute to the overall landscape quality and the back gardens of the new development could simply back on to the boundaries of the properties of the adjoining estate. This would eliminate the maintenance requirement for the buffer strip which could be awkward in terms of access. An area of land of similar size could then be added to other open space areas.

Norfolk Constabulary - Provides comments in response to the submitted Design & Access Statement and Illustrative Plan with regard to the type of play areas proposed, safety (particularly of children) in Lodge Close, and pedestrian links with the country park.

HUMAN RIGHTS IMPLICATIONS

It is considered that the proposed development may raise issues relevant to

Article 8: The Right to respect for private and family life.

Article 1 of the First Protocol: The right to peaceful enjoyment of possessions.

It is considered that refusal of this application as recommended may have an impact on the individual Human Rights of the applicant. However, having considered the likely impact and the general interest of the public, refusal of the application is considered to be justified, proportionate and in accordance with planning law.

CRIME AND DISORDER ACT 1998 - SECTION 17

The application raises no significant crime and disorder issues.

POLICIES

North Norfolk Core Strategy (Adopted September 2008):

Policy SS2: Development in the Countryside (*prevents general development in the countryside with specific exceptions*).

Policy SS 3: Housing (*strategic approach to housing issues*).

Policy SS 9: Holt (*identifies strategic development requirements*).

Policy CT 5: The transport impact on new development (*specifies criteria to ensure reduction of need to travel and promotion of sustainable forms of transport*).

Policy CT 2: Development contributions (*specifies criteria for requiring developer contributions*).

Policy EN 2: Protection and enhancement of landscape and settlement character (*specifies criteria that proposals should have regard to, including the Landscape Character Assessment*).

Policy EN 9: Biodiversity and geology (*requires no adverse impact on designated nature conservation sites*).

Policy HO 1: Dwelling mix and type (*specifies type and mix of dwellings for new housing developments*).

Policy HO 2: Provision of affordable housing (*specifies the requirements for provision of affordable housing and/or contributions towards provision*).

Policy HO 7: Making the most efficient use of land (*Housing density*) (*Proposals should optimise housing density in a manner which protects or enhances the character of the area*).

Norfolk Minerals and Waste Core Strategy and Development Management Policies DPD (adopted September 2011):

Policy CS16: Safeguarding mineral and waste sites and mineral resources.

MAIN ISSUES FOR CONSIDERATION

1. Development plan policy.

2. Housing need / land supply.
3. Access
4. Housing density and type
5. Landscape and ecological impacts.
6. Local school capacity
7. Mineral Planning issues

APPRAISAL

The application site comprises a rectangular area of flat, open agricultural land (7.1 ha.) located on the southern edge of Holt. It adjoins existing residential development to the north and west, and woodland (Holt Country Park) to the south and east.

The site lies outside of the defined development boundary for Holt (the boundary runs along the northern boundary of the site) and it forms part of the 'countryside' policy area. Under Policy SS2 of the Core Strategy housing development is not permitted in the 'countryside' (apart from 'exception' affordable housing developments and the re-use of existing buildings). The application therefore represents a departure from the development plan.

Development Plan Policy

The development plan for North Norfolk comprises:

- The North Norfolk Core Strategy (adopted 2008), and
- The North Norfolk Site Allocations Development Plan Document (adopted 2011)

Core Strategy Policy SS3 (Housing) spells out the Council's strategy to provide for at least 8000 new dwellings in the district during the plan period (2001-2021). In the case of Holt 700 new dwellings are proposed (also referred to in Policy SS9 – Holt). This figure is to be achieved by a combination of past and existing planning permissions, future windfall sites and land allocations. Two sites have been allocated in Holt, namely:

- Site HO1 – Land west of Woodfield Road. (Outline planning permission granted for up to 85 dwellings)
- Site HO9 – Land at Heath Farm / Hempstead Road. (Outline planning permission granted for up to 215 dwellings).

To date 304 new dwellings have been built in Holt since the start of the plan period. The two allocations will provide up to a further 375 dwellings. With the addition of windfall sites coming forward during the remainder of the plan period (this committee recently resolved to approve up to 153 dwellings on land owned by Greshams School which would come under this 'windfall' category), and sites which already have planning permission but are yet to be built, it is predicted that the 700 new dwellings in Holt by 2021 should be easily achieved.

Whilst it is important to note that dwelling numbers which are included with the adopted policies are expressed as minimums rather than upper limits, it is evident that there is no pressing need for further large scale developments to come forward in Holt at the present time.

The NPPF and Five Year Land Supply

A key element of the applicants' case for approval of their application is based on the issue of land supply.

The National Planning Policy Framework (NPPF) States (para.49) that "Relevant policies for the supply of housing should not be considered up to date if the local

planning authority cannot demonstrate a five-year land supply of deliverable housing sites". Furthermore the NPPF states that where development plan policies are out of date planning permission should be granted unless "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." (para 14). In other words local planning authorities are in a weakened position in refusing applications for residential development if they cannot demonstrate a five year land supply.

Accordingly the NPPF requires local authorities to identify annually a supply of deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5%. Where there has been a record of persistent under delivery of housing the buffer should be increased to 20%. The Council's published Statement of Five Year Land Supply & Housing Trajectory as of April 2014 demonstrates a supply equivalent to 5.4 years. This has been calculated using a 5% buffer. The applicants' case is that a 20% buffer should be used because of previous under-delivery, in which case the land supply for the district is only 4.7 years, equivalent to a numerical shortfall of 175 dwellings, which the current application would help to bridge.

Notwithstanding the case put forward by the applicants, members have previously agreed the methodology to calculate the district's currently published land supply and officers consider that the 5.4 year figure is the one to be used in consideration of this planning application. It is also noteworthy that the recent decision by this committee to approve up to 153 dwellings elsewhere in Holt will add significantly to the current land supply.

Access

Whilst this is an outline application with all matters of detail reserved, the applicants state that it is anticipated vehicular access would be provided via two existing cul-de-sacs which adjoin the site's northern boundary, Beresford Road and Lodge Close. The illustrative 'Development Framework' plan shows these two access points with the indication that they would be linked within the site. In practice these are the only available options to provide vehicular access into the site without acquiring additional land or property.

Beresford Road and Lodge Close link into Charles Road / Edinburgh Road, all of which form part of the residential estate on this southern part of Holt. Charles Road and Edinburgh Road connect with Norwich Road and Hempstead Road which link to the town centre and beyond. The Committee will note that much of the local concern received to the application relates to increased traffic using the local road network.

The Committee will note that the Highway Authority has not raised an objection to the application as it currently stands with details of access reserved for future approval. What is clear is that the Highway Authority consider that provided two adoptable road links are provided to serve the development (e.g. from Beresford Road and Lodge Close) this would be acceptable. They might object however to a single road link.

Housing density and type

The submitted Design and Access Statement states that the net developable area of the site would be around 5.4 ha. with approximately 1.8 ha. comprising open space. This would equate to an overall density of 24 dwellings per hectare (or 32 dwellings per hectare excluding the open space), which it is considered would be reasonable for a site of this size and location.

There are inconsistencies in the submitted documents with regard to the amount of affordable housing being proposed. The Design and Access Statement refers to there being 76 affordable homes (45%) whereas the Affordable Housing Statement

challenges the Council's affordable housing policy (Core Strategy Policy HO2) and proposes 30%. The Planning Obligations Heads of Terms states that "a proportion of affordable housing across a defined tenure mix as part of the scheme will be negotiated with the Council to reflect the extant policy and economics of the development".

The applicants have since clarified their position and have confirmed that they would agree to entering a S.106 Planning Obligation which would require 45% affordable housing to be provided subject to viability. This approach would accord with Policy HO2 and would potentially allow for a development viability assessment to be submitted subsequently, if outline planning permission were to be granted.

Landscape and Ecological Impacts

The site is not prominent within the surrounding landscape, being as it is enclosed by woodland and residential development. Neither does the site itself contain any significant landscape features. If it were to be developed for housing one important feature would need to be the provision of a soft landscaped edge, between the built development and the woodland of the adjoining country park, something that to a degree the submitted (illustrative) 'development framework' plan alludes towards.

In terms of ecology the site is some 500m from the Holt Lowes SSSI, a site of national importance, and some 5kms from the internationally important North Norfolk Coast Special Protection Area. The issue here relates to increased visitor pressure upon the integrity of these sites arising from new residential developments in the vicinity. The Committee will note the response from National England and their concerns that the applicants have provided insufficient information to determine whether or not there would be significant effects caused on these sites as a result of the proposed development.

In response the applicants have recently submitted a Habitat Regulations Assessment. The report concludes that the proposed development does have the potential to have significant adverse impacts on (1) the North Norfolk Coast Special Protection Area and (2) the Holt Lowes SSSI. The report concludes that these impacts could be mitigated by (1) a developer contribution of £50 per dwelling to support visitor monitoring and mitigation strategy, and (2) by on site greenspace provision and a developer contribution towards the maintenance and upkeep of paths within the country park and general site wardening. Natural England's response to these mitigation measures was awaited at the time of preparing this report.

Local School Capacity

The Committee will note the response from Norfolk County Council (Planning Obligations Co-ordinator) who raise serious concerns with regard to capacity issues at Holt Primary School if this application is approved, after taking into account other recent approvals for major housing developments in the town (these relate to outline planning permissions at the two allocated sites at Cley Road and Hempstead Road, and the recent resolution of this Committee to approve three outline planning applications on land owned by Greshams School).

Normally applicants would be expected to pay a financial contribution towards any shortfall in school capacity arising from their proposed development (secured by means of a S.106 Obligation). This remains an option if this application were to be approved. However in this case it will be noted that the education authority advises that there are physical constraints at Holt primary school which will prevent it being expanded to accommodate future numbers of pupils if this application is approved.

Issues relating to infrastructure and local service capacity / provision are properly considered as part of the development plan process. This would appear to be a case where a significant departure from the development plan raises such capacity issues.

Mineral Planning issues

The application site lies within a mineral resource safeguarding area identified in the Norfolk Minerals and Waste Core Strategy. An allocated mineral site (sand and gravel) is located nearby, thus indicating the presence of these materials in the local area. The County Council's policy is to object to development on safeguarded areas if the proposed development would prejudice the viable economic extraction of minerals on a particular site. This approach is also supported in the NPPF, "*When determining planning applications, local planning authorities should not normally permit other development proposals in mineral safeguarding areas where they might constrain future use for these purposes*" (Para. 144). This does not necessarily imply major extraction operations but could result in localised extraction of materials which could be used for on site construction works.

The County Council has suggested that the applicants should first carry out investigations on site (i.e. trial pits) to identify whether there are mineral resources at the site which could be extracted economically. In response to this the applicants have suggested that a planning condition could be imposed requiring that prior to the commencement of development site investigations are undertaken and if it is established that deposits could be viably extracted this is carried out in accordance with an approved scheme. A further response from the County Council is awaited.

Conclusions

There do not appear to be any insurmountable technical reasons to indicate that the site could not be developed for housing development. In addition the proposed development would have limited impact upon the wider rural landscape surrounding Holt.

However planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The principle of housing on this site does not accord with the development plan (Policy SS2 - Development in the Countryside). A principal reason for drawing development boundaries around existing settlements is to guard against unplanned piecemeal growth and to protect the countryside for its own sake.

It is the view of officers that there are no material considerations in this case which outweigh development plan policy. In particular the applicants case in relation to five year land supply is not accepted. Furthermore the evident capacity issue which this proposed development would have on the local primary school is an example why any further significant housing development in the town should be properly considered through the established development plan process.

Accordingly refusal of the application is recommended.

RECOMMENDATION: Subject to any further consultation comments received, REFUSAL for the following reasons:

The District Council adopted the North Norfolk Core Strategy on 24 September 2008, and subsequently adopted Policy HO9 on 23 February 2011, for all planning purposes. The following policy statements are considered relevant to the proposed development:

SS 1 - Spatial Strategy for North Norfolk
SS 2 - Development in the Countryside

SS 3 - Housing
SS 9 - Holt
CT 2 - Developer contributions

The application site lies outside of the development boundary for Holt in an area designated as 'countryside' in the adopted Core Strategy. Housing development (apart from 'exception' affordable housing developments and the conversion of existing buildings) is not a use permitted in the countryside policy area under Core Strategy Policy SS 2. The proposed development would encroach into an area of open countryside.

The proposed development would result in over-capacity issues at the local primary school without the opportunity for on-site expansion.

Accordingly the proposed development would be contrary to the above development plan policies.