

## Responses to NNDC Local Plan.

### Population

1. The population used in the census does not include the number of people with second homes and holiday homes. When these are taken into account our population for much of the year is substantially higher. Therefore, the need for services is substantially underestimated.

The forecast population increase of approximately 11,000 residents again does not include those that will buy properties for second homes or holiday homes, and thus again substantially underestimates the actual number of people residing in North Norfolk during the high tourist season.

2. Much of the rise in population, especially in coastal areas, will be from people wishing to retire. The social and health care sectors in North Norfolk cannot cope at present, the number of truly affordable houses will not meet the needs of workers within these care sectors. Pay in these sectors is too low for workers to be able to afford to live here. This will cause further stresses on our rural, health and social care system.

3. This plan does nothing to address access to higher education, sports facilities or skilled jobs for those in rural areas. This will leave our young people further disenfranchised. By centering housing in just a few towns, villages will further suffer a drain of youth, leaving elderly and vulnerable residents abandoned with a lack of services.

### Housing

1. Much of North Norfolk relies on the tourism and service sectors. As such, many jobs are reliant on the number of visitors to our area, therefore wages fluctuate enormously throughout the year.

2. Wages in the hospitality and social care sectors are generally under £23,000 per annum on average. Therefore, the model in the Local Plan for affordable housing will not be within their reach.

3. Without genuinely affordable housing in our villages the social fabric will be changed. The absence of families means no village schools. Lack of those of working age reduces the need for and viability of public transport. This also results in a lack of residents to volunteer to run village halls or organise social events. This further leaves the elderly trapped in their homes.

4. The number of houses proposed is excessive to the number actually needed for North Norfolk. NNDC recognise many of the properties will be purchased by those wishing to retire here or purchase a second home or holiday home. All of these would provide a modest increase in the local economy, but there will not be the workforce needed to service them. There are no proposals for primary residence occupancy, which is critical to the social and economic viability of villages and small towns.

5. Holiday homes and second homes leave our coastal areas desolate for much of the year. This impacts on public transport use, use of town and village amenities such as shops, pubs and restaurants. It increases prices of rural services and makes them further out of the reach of those on lower incomes.

6. There is nothing in this plan to increase the number of working-age residents in the area. This is necessary to be able to provide for the elderly and to meet the needs of visitors in the District.

7. More holiday homes and more second homes will mean more traffic coming to North Norfolk on unsuitable roads. This will have an economic impact caused by traffic delays, and is also likely to result in increased road traffic accidents as people become frustrated by hold-ups and attempt to overtake at unsuitable locations; there are in fact already very few safe overtaking locations.

8. The plan is not effective. For example, if 21 new houses are built in Weybourne and then they become second homes or holiday homes, this does not achieve the aim of meeting local need; the displacement argument that new houses will prevent existing homes from becoming holiday homes does not hold water. There needs to be a shift from the construction of houses to the creation of homes for local people.

9. There should be restrictions on primary residences becoming holiday homes. This should at the very least require planning permission, and the effect on the local community should be taken into account when deciding on whether to approve or not.

## **Infrastructure**

1. All new building should require improvements to roads and services PRIOR to any works commencing.

2. As recognised by NNDC, this should include alterations to roads connecting our main towns. Cromer is already deadlocked during peak hours. It has been recognised for many years that highways such as the B1439 are no longer suitable for the type and level of traffic they are exposed to. Junctions from minor roads on the A148 and A149 are not suitable for additional traffic, e.g. Holway Road, Sheringham onto the A148.

3. Many of our roads, including main roads through villages, the A149 coast road, for instance, follow the path of 18th & 19th century paths and the width has not changed in that time, making them unsuitable for increased levels of traffic.

4. Towns will need additional car parks and toilet facilities. Main towns and many villages already suffer an extreme lack of car parking and with an appalling public transport network cannot cope with the influx of visitors.

5. Lack of pavements through many villages on busy routes is a danger to the public, e.g. the A149 in Weybourne.

6. Lack of cycle routes: if cycling and walking are to be promoted, the roads have to be safe for both, and/or dedicated cycle routes need to be created linking villages and towns.

7. Increased congestion on our roads will increase CO<sub>2</sub> emissions.

## **Public Transport**

1. A bus service that runs at most hourly, and in winter only two-hourly, and that starts after school/business hours and finishes before school/business closing times is wholly inadequate.
2. There is an acute shortage of reliable and convenient public transport in rural areas, this promotes a dependency on the use cars.

### **Services & Facilities**

1. The provision of 452 additional houses in the small growth villages will put increased pressure on infrastructure and facilities, but as they are small-scale developments, this won't trigger an assessment of the additional services that will be required.
2. If most new homes in the villages and coastal areas are likely to be occupied by retired people, they will put increased pressure on healthcare provision, above and beyond that for an average age distribution
3. Ambulance response times are already woefully inadequate in rural areas. Increased housing will increase demand, especially as it is forecast that many of the new homes will be occupied by retirees who are more likely to need emergency hospital treatment than the population as a whole, while the higher population will increase traffic, thereby increasing the ambulance response times even further.

### **Biodiversity/Environment**

1. An increase in the number of second/holiday/retirement properties will inevitably increase the pressure on important wildlife habitats, as visiting this kind of site is the reason many of these people will be in North Norfolk.
2. All rules on biodiversity/climate change and adaptation etc must apply to extensions as well as new developments
3. The plan does not take into account the impact of house-owners replacing existing permeable surfaces with hard landscaping. This needs to be brought into the planning system, or there will be an increase in surface run-off from existing properties that will contribute to localised flooding, undoing any positives from the restrictions imposed in the Local Plan on new housing development. Mitigation measures need to be required at a minimum. There should be limits to the proportion of the site area that can be covered in non-permeable landscaping.
4. The rules and restrictions relating to, e.g. sustainable drainage, must apply once developments have been built, preventing owners from making changes once the property has been occupied; this is the case currently, and frankly makes a mockery of the planning system.
5. The roads are already insufficient for the current population/tourism industry. They will need development in order to cope with the influx of the predicted additional 11,000 people. This will require some incursion into countryside, with the consequential destruction of habitat and biodiversity.
6. Measures will need to be taken to reduce congestion in Cromer. When the traffic is queuing in Church St the air quality must suffer, and this will get worse with the increase in

traffic resulting from the housing development in Cromer as well as elsewhere. The air quality data on which the Plan is based is from the first half of 2020, when people were not allowed to travel much – from March 23<sup>rd</sup> until June 1<sup>st</sup>, the country was in lockdown. During this period, tourism was 56% down according to NNDC's own figures. The Plan is therefore based on a false premise.

7. Property boundaries should be marked with hedges rather than walls and hard landscaping.

8. Even if new housing is itself carbon neutral, the lack of public transport will mean that additional CO<sub>2</sub> will be emitted by cars, especially as people will be living in the large towns such as North Walsham and travelling to e.g. Weybourne to do their caring jobs etc.