

## July 2019 Site Allocations Presentation Notes

### **Slide: 1 Intro**

Welcome and thanks for coming. I know it's been a long wait but today we can at last bring you up to date on the site allocations process.

This event will be in 3 stages:

- First, a presentation to explain what's happened. That will be about 35 minutes;
- Then a chance for you to have a look at the material in more detail;
- Then at the end we'll reconvene as a group for questions and comments

If something's not clear please ask as we go along, but otherwise I'd ask you to leave questions and comments till the third stage

Before I carry on, is there anyone who would like me to explain what site allocation is? If the answer is yes, answer:

It's something national planning rules allow neighbourhood plans to do, but it's not obligatory.

In our case we have limited the process to residential housing.

The principal advantage of site allocation is it allows us to specify which sites will be developed, for how many houses and subject to what conditions.

Site allocation involves identifying potential sites via a widely published and formal invitation and then subjecting those suggested to detailed assessment against planning considerations, to establish which are suitable for development. Those that are, may then be allocated in a plan, meaning the plan defines precisely what housing may be built over the next 17 years; and in doing so inherently specifies that other sites may not be developed.

### **Slide 2: Site Allocation – Why We're Doing It**

Firstly, for anyone who wasn't at December's presentation, a quick reminder of why we're allocating sites in the Plan. It will give us the main benefits you see on screen:

**CERTAINTY:** It's the only way to be sure where new housing will be built, and - where it will not; neither of which the Local Plan does.

**SUSTAINABILITY:** The Local Plan sets out arbitrary criteria for where sites can be located, and planning decisions often pay scant regard to real sustainability. By having objective, expert and fully independent assessment made of all potential sites, we now feel confident that those allocated will be sustainable.

**CONTROL:** Not only will we have certainty of site locations, but the Plan will control how many houses are built and when, and site-specific policy criteria, agreed with the owners, will prevent future developers coming along and doing something completely different with a site.

**PROTECTION:** The 5-year housing land rule is explained in full on our website. The fact that Breckland Council rarely complies with the rule is the reason many recent planning applications have been allowed in Saham, and even when our plan is approved, that fact could seriously weaken its policies. However, by allocating sites Saham will instead be subject to a 3-year rule, at least for the first two years, and so much more immune from this loophole.

All of this will allow us to make the slogan you see here a reality.

### **Slide 3: Site Allocation – How We’re Doing It**

The first stage was a call for sites that ran from August till October last year. It gave all villagers, local landowners, and around 30 developers and housebuilders chance to submit proposals. 16 sites were put forward as a result.

Those sites were assessed independently by four different organisations, to get around any lack of knowledge on our part, and also to avoid any contention later that we may have been biased.

The detailed assessment results were summarised in a traffic-light form, where green = suitable; amber = could be suitable if constraints can be overcome, red = not suitable

I’ll show you that chart in a minute.

No one site was rated green in all four assessments. The majority were rated amber overall.

That meant more work was needed and we call that the site selection process.

The follow-on to that work is consultation with all interested parties, and this afternoon’s event is part of that.

### **Slide 4: Which Sites Were Proposed & Where?**

Before we look at the details of what’s been done, I’ll just remind you where the 16 proposed sites are. You can see a bigger version of the map on one of the display panels. And if you remember, if ALL were to be allocated, they would result in up to 222 new homes, a figure that I know that caused concern in some quarters, although I tried to stress it was just the sum of the proposals, not a concrete number for the plan.

### **Slide 5: Some Numbers... since April 2011**

I’ll tell you right away 222 houses will not be allocated in the plan.

All the same I know it’s natural for some to focus on the overall number with less thought to the sites themselves. So, here are some other numbers to give a bit of context:

The Local Plan has been in preparation for 8 years and in that time, planners have approved 87 new homes in Saham.

Of particular relevance is the fact that 78 of those were only allowed because Breckland Council couldn’t show it has a forward 5-year supply of housing land.

If the same rate of approval continued with the same lack of control till 2036, another 185 homes would be allowed between now and then.

And other than making objections, which rarely seem to carry the weight we’d like, the village would have no say in what houses were built, where or when.

### **Slide 6: So, What’s the Right Number?**

There are several possibilities.

The Local Plan says “not significantly more than 33 new houses” adjacent to the settlement boundary, plus any number inside as long as they comply with policies;

We remain of the view that there’s little logic in the method the planners have used to set a target of 33, and that even such logic as it does have is flawed by the omission of two important factors:

- The Government’s increased estimate of how many houses are needed in Breckland up to 2036;

- An affordability factor to account for the great disparity between earnings and house prices, as specified in national planning guidance.

By multiplying 33 by both of those factors, in the Plan we set a minimum number of 48 houses adjacent to the settlement boundary.

But being based on the 33 number, other than the two new factors, that still lacks much logic.

That's why I want to stress as much as I can that if the question is "how many new houses would be sustainable in Saham?", then neither 33, nor 48 are the correct answer.

Why?

Because to calculate 33, no-one from Breckland Council made an assessment of available land in the village, no-one took account of highways, flood risk, heritage, landscape, nor all the other factors that help decide if any site is sustainable.

And, because the factors used to increase 33 to 48 are just the most recent statistics. Housing need in Breckland may go up again when next published (and yes of course it may go down, but that hasn't been the trend). The affordability factor changes every time it's calculated, and as long as house price rises outstrip increases in earnings, the factor will also increase.

Our aim is to have a Plan that will stand up to whatever's thrown at it, not just over the next year or two, but all the way to 2036. I said earlier that allocating sites gives the village certainty about what's coming, and I firmly believe it's better for the plan to have the best chance to deliver that certainty over its entire life, rather than be subject to regular changes to reflect new statistics, particularly if those changes would be outside the village's control.

So, we're firmly of the opinion that the right number can only be established by a process that after assessment of all available sites; relies on policies, hard facts, and robust analysis. In December I asked you to forget an arbitrary limit, be that 33 or 48 or something else, and let the site allocations process tell us all what the right number is, and having completed most of that process, I'm even more convinced that's the best approach.

**Hence if there were just one thing I could persuade you of today, it would be to forget any arbitrary maximum number, be that in the Local Plan, the Neighbourhood Plan or simply something that feels right to you. Those numbers are the starting point, not the finish line. That is set by the process I'm about to explain.**

### **Slide 7: Independent Site Assessments**

Our first step was to take stock of the independent site assessment results, so let me summarise what those were and what they told us.

AECOM are specialist consultants appointed by the Housing Ministry to make general site assessments. As well as the 16 sites that came forward, they told us they were obliged to assess sites that were the subject of undecided planning applications at the time of doing their work. There were two of those – Meadow Farm and Nilefields, which added 57 homes to the potential total.

Although not obligatory, we felt it was sensible to also ask the local highways and flood authorities and Anglian Water to assess the sites; partly because they have specialist skills and knowledge AECOM lack, and partly because roads and flood risk are always concerns in Saham and we wanted them to be fully accounted for.

Detailed assessment results were summarised by a "traffic light" system described here. Basically, green is good, amber might become good if certain measures are taken, and red is bad.

## **Slide 8: Site Assessment Results**

Here are those summary results. Please don't strain your eyes trying to read every detail, you can see larger versions on the display panels later.

But hopefully you can see that no site was rated green in all 4 assessments, all had some form of constraint. And the assessments didn't tell us how one site compared to the others. So, we developed a site selection process to do that, and now, without apology, I'm going to go through the process we've used at some length, because without any arrogance, I believe if you agree with the method and the way we've applied it, like me, you will find it difficult to argue against the results.

I realise it may all seem a bit complex at first sight, so if you have any questions on the process itself, please ask as we go along.

Before I explain the process, I want to stress that my group and I had no self-interest in whatever the result was; we're not developers or landowners with a financial interest, but neither are we nimbys trying to find any reason we can to prevent development. Whatever the final number is, personally we neither gain, nor lose from it, and so have been impartial in what we've done.

## **Slide 9: Site Selection Process – 1**

I'm giving some numbers here to illustrate that this was not a simple "what do we all think?" type process.

First, we looked for ways to overcome the constraints identified in the 4 independent assessments which meant considering all 243 of them. Thanks to local knowledge, and a good deal of research, we were able to resolve many of those concerns. To do so, in some cases that meant reducing the size of a site and the number of houses that might be built on it. Some concerns proved to be beyond our knowledge or resources to resolve, and those we recently passed on to the relevant landowners to allow them a chance to look for solutions. In 2 cases – the planning application sites added by AECOM as part of their assessment – the constraints were too fundamental to be resolved, and we eliminated those sites from the process.

Next, since the assessments made no attempt to tell us which of the potential sites we should allocate, even if constraints were overcome, or to compare any one site with the others, we decided the most objective way to do that would be to apply policy criteria from the Local and Neighbourhood Plans; just as would be done were the proposals to become planning applications. But of course, landowners have not put forward all the detail that would be needed for an application, so not all criteria could reasonably be applied. We decided there were 17 criteria on which judgements could reasonably be made at this stage, which I'll go through a little later.

We also realised that not every criterion has equal importance, so we gave each a weighting to reflect that.

Next to ensure all judgements were objective and consistent, we not only set a sliding scale to rate each site against each criterion, but wrote a description for each point on each sliding scale – which meant 85 different descriptions.

Now using the sliding scale descriptions, we had to decide how each site rated against each criterion, which entailed making 272 decisions.

Then we let a spreadsheet do all the sums to work out the total rating for each site.

### **Slide 10: Site Assessment results – Mitigated**

These are the adjusted assessment results after we'd found solutions to most of the constraints. Again, you can see these at a larger scale on the displays, but I'll just point out:

- Where we invited site owners to look for solutions their sites are red until and if they are able to present acceptable solutions;
- If you're wondering why the majority of the results are still amber, that's because in those cases where we mitigated constraints, the means of doing that have been included as policy conditions for the sites concerned, so until the owners and others agree the policies for their site they cannot be green.

### **Slide 11: Site Selection Process – 2**

As I mentioned, as we overcame constraints, in many cases we added the solutions as conditions to draft policies for each site.

Where we were not able to overcome constraints, we recently passed them on to the site owners and awaited their responses before writing policies for those sites. If and when owners suggested solutions, we reviewed their evidence (which could be a letter from the highways authority for example) and if it was satisfactory wrote a policy for their site. But if we were not convinced by the evidence or an owner chose not to suggest a solution, the site dropped out of the process.

Having worked through all those steps, we need to agree draft policies with the owners – if they would not later comply with them, we cannot say the site is not only suitable for development but is deliverable (meaning there is a realistic likelihood it will be developed) and that would mean in planning terms, allocation would be invalid. That's a process we started recently and is not yet complete.

### **Slide 12: Site Selection Process – 3**

In parallel with all of this work, we've been updating the rest of the plan as I outlined at our last presentation. While the intent of the policies remains the same, the wording has changed significantly in many cases from the previously published version and the plan includes a number of new policies, particularly dealing with landscape. You may have seen a preview version, excluding the site allocation material, on our website.

Our consultant recently reviewed both the plan and our draft site selection report and we were pleased while she made some very helpful recommendations to improve things, she didn't find anything fundamentally wrong, and that included the draft site allocation policies.

While we finalise discussions with site owners, take your initial comments and liaise with Breckland Council, we're not quite ready to make final recommendations to the Parish Council as to which sites should be allocated in the Plan and be reviewed as part of a formal consultation. As we complete those tasks, the overall status you see today will likely change, so please keep that in mind. The final proposals will come when the whole plan is published for its next formal public consultation.

### **Slide 13: Site Selection Criteria**

Hopefully that's outlined the overall method we've used, so now here's more detail on how we've applied it.

These are the 17 criteria we used to rate each site. Hopefully you'll agree we covered all the issues that generally concern people about development in the village.

In planning terms all of Saham has poor accessibility to services and facilities, but some sites are better located than others in this respect so we took that into account.

We've published a housing needs assessment showing that homes of 3 or fewer bedrooms are what's most needed, so sites providing those scored well against that criteria.

If sites might impact neighbours' amenity, they were scored down for that.

Some of the sites are close to heritage buildings and that was taken into account.

We don't want closely packed housing estates so site density was rated.

Access from sites to and from our roads, and the width of those roads was taken into account.

Impact on village landscape and key views was an important factor, guided by our consultant's landscape assessment reports.

Each site's flood risk was identified and rated.

In terms of loss of land, brownfield sites were rated better than greenfield ones, and loss of agricultural land was scored down.

We also looked at potential impact on biodiversity and opportunity to improve public open space.

### **Slide 14: Criteria Weighting - 1**

Looking at the previous slide, you'll probably have your own ideas about which criteria are more important than others. But rather than just personal opinion, we wanted a more objective way to give weight to each criterion and this is how we chose to do that. Before you review the results of the site rankings please decide if you agree with this aspect of the ratings, which you can also see on the displays.

### **Slide 15: Criteria Weighting - 2**

Based on the descriptions on the previous slide, this is how we weighted each criterion.

You can see that highway issues and flood risk come out as the most important factors, with village housing need and landscape impact close behind. While the plan is trying to tackle many things, these are the most important topics and the ones that come up time and again when we talk with villagers about what's important to them. If you think this weighting should be different in some way, please as well as telling us how you would weight each item, also tell us why.

### **Slides 16-20: Criteria Rating Descriptions – 1 to 5**

I told you earlier we defined a sliding scale rating system with five steps for each criterion. We quickly realised that just choosing a score from 1 to 5 was too simplistic and too subjective – the five of us in the group did just that and in some cases the results were quite different. So, we've tried to develop a method that as far as possible makes decisions on how to rate a site black and white. Like the criteria weightings, these sliding scales are critical to the final results, so please take the time to read them on the display panels and give us any comments.

We started with all the scales being 1 to 5, but our consultant pointed out that meant in some cases we were giving a positive score to a site having a negative aspect, so we changed each scale accordingly, and that meant some range from -2 to +2, some from -1 to 3 and some from 0 to 4.

Believe me because I checked it very carefully, whichever range of 5 scores is chosen, the order in which sites are ranked according to the results remains the same, but it is more informative to see where sites rate positively and negatively.

All of the descriptions are on display, so for now I'll just show you a few examples:

Distances – relative to Government guidelines

Highway access – how certain and how safe is it?

Impact on landscape from blending in well to the opposite end of the scale

### **Slide 21: Site Selection Ratings**

Rating the sites could have been a highly subjective task, but by selecting policy-based criteria, weighting them according to their importance and defining descriptions for each step of each rating sliding scale, it became entirely objective and more of a mechanical process, albeit we still gave very careful thought to how each rating description applied to each site for each criteria and this stage occupied many of our weekly meetings.

Here I'll reiterate that if you agree we chose the right criteria, weighted them appropriately and set suitable descriptions for each rating scale, then if you rate the sites yourselves according to those, you should get the same results. Feel free to try it yourself for any site that particularly interests you, and see if you do.

Again, you can examine this chart in closer detail on the display panels.

Here I will point out that decisions we reach as a result of discussions with the site owners and your feedback today may lead to some items being reassessed. That will also happen for sites where the owners present acceptable solutions to constraints. The final conclusions will be given in our site selection report which will be published once agreed with the Parish Council.

### **Slide 22 & 23: Overall Ratings and Site Rankings 1 & 2**

The overall rating for any site is simple arithmetic – multiply its rating by the weighting for each criterion, then sum the 17 results. We let our spreadsheet do that for us and these were the results – again prior to discussions with owners and your comments. The first slide is in order of the sites' numbers, and the second by order of rating. On that slide you'll also see a reminder of how many houses each site was considered for following the earlier adjustments based on the site assessments.

The exclamation marks indicate the sites where we invited the owners to suggest solutions to constraints we were unable to mitigate, and which, regardless of rating or ranking, cannot be allocated unless a satisfactory solution is put forward.

Two sites offered two solutions. In the case of Richmond Hall, the larger site rated higher, so the smaller option is eliminated. In the case of 8 Richmond Road that decision will depend on which of the two options the owner decides is economically viable. If both are, the smaller option will be preferred as it rated higher.

### **Slide 24: Site Selection Process Recap**

I know all of that is perhaps a lot to take in, so here's a brief recap of the steps in selecting sites:

We took the results of the 4 independent site assessments and where possible resolved the constraints, where necessary with help from the site owners and sometimes by modifying the original proposal;

We chose policy criteria against which to rate the relative plus and minus points of each sites;

We decided the relative importance of each criterion;

We wrote descriptions rating sites on a 5-step scale;

Based on those descriptions we rated each site, then summed the results;

For each site that came successfully through that process we wrote a draft policy and discussed it with the owner, sometimes leading to more modifications;

Today we're taking your initial views; and

Once discussions with owners are complete we'll finalise our site selection report recommending which sites will be included in the plan, subject to approval of the PC.

### **Slide 25: Current Site Status**

As I've explained we're currently in discussion with the site owners about draft site policies or potential constraint solutions. We are not making any compromises that go against the principles of the plan, but those discussions inevitably involve some give and take, so, although based on the results, we have a good idea of which sites we'd like to recommend, that may change either as a result of the ongoing discussions or as a result of your feedback today.

Anyway, this is how things stand with the discussions as we speak, and I'll say a little about each site in a minute.

### **Slide 26: Current Site Status Map**

And this is the same thing in map form.

### **Slide 27: Where Does All That Leave the Numbers**

So, you may be asking, what's the final number? I stressed earlier that the number of houses we allocate in the Plan should be whatever came out of the site assessment and selection process. The only relevance of the target of 48 I explained earlier is that it sets a minimum level that should be allocated.

So, bearing in mind things are still being finalised, I'll first remind you that initially a potential total of 222 houses were put forward.

By considering undecided planning applications AECOM added 57 to that total, so it became 279.

That was reduced during our constraint reviews to 149.

Now we currently have 19-21 houses on sites with a green status – everything agreed with the owners, 65 where sites have amber status – discussions ongoing; and 74 on sites that have been eliminated from the process for one reason or another.

As a result, as I speak there are potentially and provisionally sites for between 84 and 86 houses that would be acceptable according to site assessment and selection. Although actual development won't happen at a uniform rate, on average that would be about 5 houses per year. Now as you consider that, also remember the number I told you earlier – the 87 houses approved by planners in the last 8 years which is around 11 per year.

Here I want to pause and reiterate that these are the numbers that come out of the selection process, so if you wonder why they exceed Breckland Council's target of 33 or the 48 we calculated as a minimum, then the answer is these are the provisional numbers the process tells us are suitable for development, and that result is more rigorous and objective than any other number that may be suggested. The process tells us Saham can sustain around 86 houses over the plan period. They would be in locations that are known in advance, in line with well-defined conditions. So here I'd ask that before you tell us the number is too high you first consider the alternate... which is to trust Breckland planners to manage development in an equally controlled way, and to believe they will adhere to their own target for Saham. And if you're inclined to do the latter, I'll tell you that they've already admitted to me they cannot apply a hard and fast limit on development numbers. Their plan also sets no controls on



the timing of development. So, let's say they continue their current rate of approvals and allow 33 new homes in the first 3 years of the plan: do you believe they will refuse all further development for the next 13 years? I don't and I'll give you some reasons why:

- The Breckland Plan in force until the Local Plan is approved, says that from 2012 till 2025 there will be no new housing approved in Saham Toney. That's worked well hasn't it?
- 2 years ago, the Local Plan said there would be 205 more new homes in Watton up to 2036, and yet from March 2017 to March 2018 alone, planners approved 301 there.
- And the Local Plan sets Yaxham a target of 18 new homes up to 2036. Yaxham already has an approved neighbourhood plan, but it doesn't allocate sites, and instead put their faith in planners... and have had 38 new homes approved since 2016 as a result.

Okay, as you think about that, I said I'd say a little about each site that remains in the process so I'll do that now...

Firstly STNP2, 9, 11 or its option 15, 13 and 14 are agreed with the owners.

STNP16: Owner out of the country till 19 July after which will have discussions (+ masterplanning)

STNP1 (**SHOW SLIDE 28**)

STNP4, 5, 6 & 7 **Show slide 29**

**Slide 28: STNP1**

proposed 10 > 6 > revised 10. waiting owner response (agent difficulty).

**Slide 29: STNP4, 5, 6 & 7**

as proposed > revised to constraints > provisional constraint solutions (traffic report, masterplanning)

**Slide 30: STNP5 and the View to the Mere**

Talk about limiting development to retain the view

**Slide 31: Housing mock-up**

Show each Pound Hill site in sequence 1 + 4 (13 - 2020-24); 6 (5 -2025-28), 5 (12 - 2029-32) 7 (8 - 2033-36)

Then other sites approved by planners around the central area

**Slide 32: Site Policies**

The policies are on display and I'd ask you to read them, as this process is not just a case of saying to a landowner whose site is allocated, okay now you can do what you want with your site. Each site has policy conditions which set out the terms under which a future planning application would be acceptable, including of course the number and type of houses that may be built.

The policies were reviewed by our consultant and agreed with her, prior to discussion with the site owners, so we believe apart from fine details they are complete, but remember in some case that final detail includes agreeing a number of houses for a site. But if you think we've missed anything important in them, please let us know during the question and comments section of this event.

**Slide 33: Policy Discussion Status**

This is just a reminder of the current status of our policy discussions with the site owners and the fact that things that may still change as a result of those.

We realise we cannot simply dictate to the site owners: this whole process is about finding solutions that are right for the village and at the same time meet the owners' objectives and are economically viable. So, there can be some compromise but where contention arises, we have our red lines, based entirely on not compromising the principles of the Plan.

#### **Slide 34: What We'd Most Like To Hear From You**

As you look at the display panels these are the things we'd really like you to have in mind when it comes to giving us your comments. There are some blank forms by the displays that you can simply tick or cross.

Read list...

#### **Slide 35: But That's Not All...**

We've been working on this for many weeks whereas for much of the material this is the first chance you've had to hear about it and read the detail.

So much as we'd like objective comments based on the method used and the way we've applied it, we do understand you may also have some more emotional reactions to various sites, and so we're happy to take your initial "gut-feel" reactions as well. That said, it's only the objective comments that will influence the recommendations we make to the Parish Council.

Any comments you give us today will be very useful in helping us to finalise the recommendations we make to the Parish Council about which sites to allocate.

In addition, we'll make today's material available on our website and leave it open for comment over the next week.

#### **Slide 36: What Happens Next?**

After that as soon as the owner discussions are complete, we'll finalise the site selection report accordingly and make our recommendations to the Parish Council. If they approve what we propose the whole plan will then be published for a formal 6-week consultation, during which you'll have the chance to make more detailed and considered comments.

#### **Slide 37: Questions and Comments**

As I said at the start to begin with, I'll just take questions to clarify your understanding of what I've presented, particularly about the process we have used.

Then please look at the displays, read the draft site policies, look at the various charts and other material in more detail, and we'll reconvene for detailed questions and comments in say 40 minutes, or whenever everyone's ready if sooner. If you want to see any maps that help decide the criteria ratings, such as where the key views are, let us know and we'll put them up on the screen.

If anyone prefers to talk individually to us, we'll be here to take your comments while everyone's browsing the displays; and if anyone can't stay for the group discussion, please leave any comments on the blank forms provided – with your contact details if you want us to get back to you later.