

SAHAM TONEY PARISH COUNCIL

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Our Ref: STNP-JS-008

Dear John

Observations on the Breckland Council Response to Your Additional Comments

As Clerk of the Neighbourhood Plan Steering Committee, I have been requested to forward this email to you.

Having considered Breckland Council's response to your additional comments, we respectfully offer the following observations:

Policy HOU 04 of the adopted Local Plan states:

The following rural villages have settlement boundaries (as defined on the policies maps): Beeston, Beetley, Carbrooke, Caston, Gressenhall, Griston, Hockham, Lyng, Mundford, North Lopham, Rocklands, Saham Toney, Thompson, Weasenham, Shropham, Eccles Road (Quidenham) and Yaxham & Clint Green.

Appropriate development will be allowed immediately adjacent to the settlement boundary, subject to being supported by other policies within the development plan* and where all of the following criteria are satisfied:

- 1. The development is of an appropriate scale and design to the settlement;*
- 2. It would not lead to the number of dwellings in the settlement increasing by significantly more than 5% **from the date of adoption of the Plan**. The settlement refers to the number of dwellings inside the defined settlement boundary;*
- 3. The design contributes to preserving, and where possible enhancing, the historic nature and connectivity of communities; and*
- 4. The development avoids coalescence of settlements.*

Opportunities for self-build dwellings which meet the criteria set out above will be supported.

**with the exception of Policy GEN 05 Settlement Boundaries*

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The text highlighted in bold in point 2 is significant with regard to monitoring how many dwellings have been added to a settlement and hence whether the minimum housing requirement for that settlement has been met.

In section 2 of our response to your additional comments, we listed the planning applications for new residential development that have been permitted in Saham Toney since 28 November 2019 (the date of adoption of the Local Plan). That list shows in total those permissions will deliver 19 new dwellings, including 3 allocated in the Neighbourhood Plan.

However, in its response to your comments 7 and 8, Breckland Council suggests that the minimum housing requirement for Saham Toney had been met and exceeded by October 2020, stating: *“45 dwellings either completed or with extant planning permission between the adoption of the Plan and Oct 2020”*.

With the greatest respect, we consider this an erroneous interpretation of Policy HOU 04 and therefore that it may be harmful to the Neighbourhood Plan, if as a result, Breckland Council’s suggestion to remove the split of sites from neighbourhood plan policies is implemented, albeit we fully recognise the suggestion has been made with the best intentions of supporting the principle of a ‘local connections first’ policy for Saham Toney.

Unfortunately, it will not achieve that objective, if going forward Policy HOU 04 is applied by development management officers in line with our interpretation of Policy HOU 04: i.e. that only permissions granted after the date of adoption of Local Plan will count towards satisfying the minimum housing requirement. In fact, in that case the number of affordable homes available for those with a local connection will potentially be reduced.

Conversely, retaining the split of sites in the Neighbourhood Plan will safeguard the agreed local connection approach regardless of whether our interpretation of Policy HOU 04, or that set out by Breckland Council in its response is implemented in practice.

Moreover, if Breckland Council now intends to apply Policy HOU 04 in a different manner to that set out in the Local Plan, we would wish to see that new interpretation incorporated in the Neighbourhood Plan to avoid future doubt. If that is the case, we suggest the following addition to Policy 2C:

P2C.4 When applying Local Plan Policy HOU 04, the increase in the number of dwellings in Saham Toney shall be taken as the number of dwellings completed or with extant planning permission since the date of adoption of the Local Plan.

We must stress we are only advocating such an addition if the split of sites for the purposes of allocating affordable homes is removed from the Neighbourhood Plan.

In light of our observations, you may consider it helpful to ask Breckland Council to reconsider its response in this respect, or to verify that going forward its development

management officers will indeed apply Policy HOU 04 in the way its response to your additional comments proposes.

Yours sincerely

Jill

Jill Glenn
Clerk to the Neighbourhood Plan Steering Committee

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