

# **EVIDENCE BASE**

## **FOR THE SAHAM TONEY NEIGHBOURHOOD**

### **DEVELOPMENT PLAN 2018 - 2036**



## **VOLUME 2**

### **REASONED JUSTIFICATION FOR POLICY 1:**

### **NEIGHBOURHOOD AREA CLASSIFICATION**

### **AND HOUSING ALLOCATION**

**REGULATION 14 PRE-SUBMISSION**

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## **1. CLASSIFICATION OF SAHAM TONEY IN THE BRECKLAND SETTLEMENT HIERARCHY**

1.1 The settlement hierarchy proposed in the emerging Local Plan focuses growth firstly, in the two principal locations Thetford and Attleborough, secondly in the market towns of Dereham, Swaffham and Watton, thirdly in the Local Services Centres (of which there are 18); and fourthly in the Rural Settlements with Boundaries (of which there are 17). Saham Toney is classified in the fourth tier of the hierarchy due to its limitations with regard to facilities and services as underpinned by evidence set out in the document Breckland Local Service Centre Topic Paper, which was updated by Breckland Council in July 2017. Local Service Centres (the third tier of the settlement hierarchy) are considered to be those that contain adequate services and facilities to meet the day to day requirements of existing residents.

1.2 The Breckland Council assessment was based on the existence of various services in settlements and required a settlement to have all of the following in order to be classed as a Local Service Centre:

1. Public transport, taking account of the frequency of service and the ability to reach a higher order settlement in working hours;
2. A community facility, such as village hall, public house, cafe or restaurant;
3. Employment, taking account of the available level, the size of businesses and the existence of a business park;
4. A shop / post office;
5. A school.

1.3 Saham Toney meets 4 of these criteria, but does not have a shop or its own post office, and therefore did not qualify as a Local Service Centre.

1.4 This Plan supports the classification of Saham Toney as a Rural Settlement With Boundary. However since the Local Plan is not yet adopted and the Local Development Plan of 2012 classifies Saham Toney as a Local Service Centre, given that the Saham Toney Neighbourhood Plan may be made before the Breckland Local Plan is adopted, Policy 1 confirms the Rural Settlement With Boundary classification.

## **2. HOUSING ALLOCATION BACKGROUND, METHODOLOGY & CALCULATIONS**

2.1 The adopted Local Development Framework shows an allocation of zero additional dwellings to Saham Toney for the period to 2026 . If adhered to this would be an unwarranted restriction on the amount of development that is deemed to be appropriate in the emerging Local Plan. Although in theory there is no obligation for this Plan to adhere to the emerging Local Plan rather than the adopted Local Development Framework, since the emerging Plan bases its housing allocations on evidence from the latest Central Norfolk Strategic Housing Market Assessment, published in June 2017, it provides a much sounder basis for those policies of this Plan that relate to the development of housing.

2.2 The emerging Local Plan makes no specific allocation of new housing to Saham Toney. In Policy HOU 02 it does allocate 150 new houses to the 17 Rural Settlements With Boundaries (which include Saham Toney), and further in Policy HOU 04 it stipulates a limit on the amount of new housing that may be developed immediately adjacent to the settlement boundary: that limit being 5% of the number of dwellings inside the settlement boundary from the adoption date of the Local Plan. No limit is specified within the development boundary or in outlying countryside areas. No justification is presented in the emerging Local Plan for the 5% limit.

2.3 As a result there is a lack of certainty about the level of residential development to be planned for in Saham Toney over the Plan period. It is considered that lack of certainty is inconsistent with both recent Government proposals and the spirit of Localism.

2.4 The Government's consultation proposals for the White Paper "Planning For The Right Homes In The Right Places", published 14 September 2017, state "When planning for their future housing need, communities should have certainty on what level of housing they should look to plan for at the outset to allow them to progress with confidence with their neighbourhood plan." The emerging Local Plan does not provide such certainty and hence in its absence Policy 1 quantifies Saham Toney's sustainably proportionate share of Breckland Council's total allocation to rural settlements. Should Breckland Council provide certainty in this respect in a future adopted version of the Local Plan, this Neighbourhood Plan will be amended accordingly.

2.5 Also of relevance are the Neighbourhood Area's key development constraints linked to limited road / pedestrian infrastructure or public transport network, high landscape sensitivity and flood risk; as well as the existing rural character of the village with its low density settlement edge. These constraints are fully explained in Evidence Base - Volume 1: Saham Toney's Key Development Constraints and shall be taken into account by those proposing, reviewing or deciding development applications. The key constraints shall be given greater weight than mere adherence to any housing allocation defined by the Neighbourhood or Local Plans.

2.6 Of key consideration is the potential adverse impact that settlement edge development could have on the rural setting of Saham Toney and this is documented well in the Breckland District Settlement Fringe Study undertaken by Land Use Consultants in May 2007. This explains that the landscape surrounding Saham Toney creates a distinct rural setting to the settlement and that its rural character is highly sensitive to further expansion. It describes a low density, well integrated settlement edge where large blocks of infill should be avoided. This sensitivity places a constraint on the quantity of development that could come forward without damaging the rural character of the village.

2.7 There are no classified roads in the Neighbourhood Area and the extent of pavements is limited. The majority of houses in the village are situated adjacent to, or between two main routes; Richmond Road on the west side and Pages Lane, Chequers Lane and Cley Lane to the north and east; the two routes being connected by Bell Lane. All of these are narrow rural roads.

2.8 Breckland Council's Strategic Housing Land Availability Assessment Review, 2014 determined that of 21 potential housing sites assessed near to the settlement boundary, 15 were "non-deliverable". Highway and access constraints were among the main factors that resulted in that determination.

2.9 Norfolk County Council's Local Flood Risk Management Strategy 2015 estimated that 100 properties in Saham Toney may be at risk of surface water run-off flooding. Its draft Flooding Investigation Report: Flooding in Watton and Surrounding Area on 23 June 2016 (published December 2017) confirms that estimate, noting:

- i. 37 residential properties are subject to surface water flood risk at a 1 in 30 year event;
- ii. 63 residential properties are subject to surface water flood risk at a 1 in 100 year event; and additionally
- iii. 2 non-residential properties are subject to surface water flood risk at a 1 in 30 year event; and
- iv. 2 non-residential properties are subject to surface water flood risk at a 1 in 100 year event.

2.10 Paragraph 3.10 of the emerging Local Plan states it: ".allows for some development within and immediately adjacent to settlement boundaries up to a cumulative limit...". This justifies setting a proportionate share of the housing allocation to apply both within and immediately adjacent to the settlement boundary.

2.11 Clause 3.10 of the emerging Local Plan states "A 7% allowance for rural areas is identified as being consistent with the approach within Policy HOU 04, which allows for some development within and immediately adjacent to settlement boundaries up to a cumulative limit of development for each village, so as to be commensurate with the position in the settlement hierarchy. The deliverability of this figure can be evidenced through representations from landowners and developers which demonstrate that sites are available and developable. A figure greater than 7% for development in the rural areas has been disregarded because such development is required to be treated as windfall." Clause 3.12 goes on to state that the 7% figure shall include completions and commitments since 2011. Policy HOU 02 states that a 7% allowance for the 17 rural settlements results in a total housing allocation of 1052 new houses to those settlements. Of those 902 houses are completions or commitments, leaving an allocation of 150 new houses from 1 April 2017 to the end of the Plan period in 2036. This is therefore taken as the starting point for calculating a sustainably proportionate share of the overall housing allocation.

2.12 Policy GEN 05 of the emerging Local Plan states "Within the defined settlement boundaries and the boundary for Attleborough Strategic Urban Expansion (as shown on the Policies Map) proposals for new development are acceptable, subject to compliance with National and other Local Plan policies." Such wording is accepted and broadly supported, but is not fully consistent with the reasoned justification of Policy HOU 04 that states "the level of new development permitted in settlements defined in the policy will be restricted.", since Policy GEN 05 does not define an acceptable limit for development within a settlement boundary. Policy 1 seeks to address that omission by specifying that taken individually or cumulatively the scale of residential development shall not exceed the sustainably proportionate share defined in Policy 1, regardless of location within or outside the settlement boundary, unless certain exception criteria are satisfied. This is justified since the housing allocation in Policy HOU 02 of the emerging Local Plan, on which the sustainably proportionate share definition is partly based, applies to development both within and outside the settlement boundary.

2.13 In an ideal situation a full assessment of land in the Neighbourhood Area against the development constraints (see Evidence Base Volume 1) and sustainability criteria would establish a constrained level of sustainable development that would provide certainty to all. Unfortunately Saham Toney Parish Council and its Neighbourhood Plan Steering Committee lack both the resources and expertise to perform such an assessment, and since an assessment has not been performed by Breckland Council in support of the Local Plan, it is assumed it similarly is unable to carry out such an assessment.

2.14 Instead a wide range of statistical and numerical methods are applied. It is recognised that any one method will have limitations, but it is considered that by examining 10 methods an adequately reliable picture emerges.

2.15 The 10 methods and the calculation for each are set out in the table below.

## METHOD 1: BY RATIO OF THE NUMBER OF RURAL SETTLEMENTS WITH BOUNDARIES

Policy HOU 02 of the emerging Local Plan classifies 17 villages as Rural Settlements With Boundaries, and allocates a total of 150 new homes to those settlements over the plan period.

On the simplest arithmetical basis Saham Toney's share of this allocation would be  $150 \div 17 = 9$

## METHOD 2: BY RATIO OF POPULATION TO BRECKLAND OVERALL

From 2011-2036 Policy HOU 02 of the emerging Local Plan allocates a minimum of 15,950 new houses district wide.

At the 2011 census the total population of Breckland was 130,491 and that of the Parish of Saham Toney was 1507.

By ratio of population Saham Toney's share of the overall allocation would thus be  
 $(1507 \div 130491) \times 15950 = 184$

64 new houses have been completed or committed in Saham Toney between April 2011 and December 2017. Therefore the remaining allocation would be  $184 - 64 = 120$

## METHOD 3: BY RATIO OF POPULATION TO THE 17 RURAL SETTLEMENTS WITH BOUNDARIES OVERALL (and using the 2011-2036 housing allocation)

From 2011-2036 Policy HOU 02 of the emerging Local Plan allocates a minimum of 1,052 new houses to the seventeen rural settlements with boundaries.

The overall population of the 17 rural settlements with boundaries at the 2011 census was 15,318 (see table below).

Rural Settlement	Population (2011 census data)	Rural Settlement	Population (2011 census data)	Rural Settlement	Population (2011 census data)	Rural Settlement	Population (2011 census data)
Beeston	566	Eccles Road (Quidenham)	560	Mundford	1526	Thompson	343
Beetley	1396	Gressenhall	1050	North Lopham	623	Weasenham	382
Carbrooke	2073	Griston	1540	Rocklands	722	TOTAL	15318
Caston	443	Hockham	603	Saham Toney	1507		
Clint Green and Yaxham	772	Lyng	807	Shropham	405		

The population of Saham Toney was 1507.

By ratio of population Saham Toney's share of the overall allocation would thus be  
 $(1507 \div 15318) \times 1052 = 103$

64 new houses have been completed or committed in Saham Toney between April 2011 and December 2017. Therefore the remaining allocation would be  $103 - 64 = 39$

## METHOD 4: BY RATIO OF POPULATION TO THE 17 RURAL SETTLEMENTS WITH BOUNDARIES OVERALL (and using the 2017-2036 housing allocation)

From 2017-2036 Policy HOU 02 of the emerging Local Plan allocates a minimum of 150 new houses to the seventeen rural settlements with boundaries.

The overall population of the 17 rural settlements with boundaries at the 2011 census was 15,318 (see table included with Method 3). That of Saham Toney was 1507.

By ratio of population Saham Toney's share of the overall allocation would thus be

$$(1507 \div 15318) \times 150 = 15$$

Therefore the remaining allocation would be **15**

## **METHOD 5: BY CONSTANT RATIO OF HOUSEHOLDS TO BRECKLAND OVERALL (2011 BASE)**

At the 2011 census the total number of dwellings in Breckland was 57,425 and in Saham Toney was 731, which equates to 1.27% of the district total.

The emerging Local Plan allocates a minimum of 15,950 new houses district-wide over the plan period. Hence the number of dwellings in Breckland will be at least  $57425 + 15950$  in 2036 = **73375**

If Saham Toney's proportion of total dwellings were to be maintained its total dwellings in 2036 would be:

$$73375 \times (731 \div 57425) = 934$$

This would represent an increase of  $934 - 731 = 203$

64 new houses have been completed or committed in Saham Toney between April 2011 and December 2017.

Therefore the allocation from 2018-2036 would be  $203 - 64 = 137$

## **METHOD 6: BY TREND RATIO OF HOUSEHOLDS TO BRECKLAND OVERALL**

At the 2011 census the total number of dwellings in Breckland was 57,425 and in Saham Toney was 731.

Policy HOU 02 of the emerging Local Plan indicates that at 31 March 2017 a further 10,858 houses had been completed or committed. By the same date a further 64 new houses had been completed or committed in Saham Toney.

Therefore in effect at 31 March 2017 there were  $(57425 + 10858) = 68283$  dwellings in Breckland; and  $(731 + 64) = 795$  in Saham Toney; meaning

At 31 March 2017 Saham Toney's proportion of the district's dwellings was  $(795 \div 68283) 1.16\%$  as compared with 1.27% in 2011.

Hence over a 6 year period Saham Toney's share of the total district dwellings decreased by 0.11%, or 0.018% per year  $\{[(731 \div 57425) - (795 \div 68283)] \div 6\}$

If this trend were to continue until 2036 Saham Toney's share of the total district housing total would be  $1.16 - (19 \times .018) = 0.82\%$

0.82% of the minimum district total in 2036 =  $(57425 + 15950) \times 0.0082 = 557$

In theory a reduction, but hence indicating **zero growth** between 2017 and 2036

## **METHOD 7: BY CONSTANT RATIO OF HOUSEHOLDS TO BRECKLAND OVERALL (2017 BASE)**

At the 2011 census the total number of dwellings in Breckland was 5,7425 and in Saham Toney was 731.

Policy HOU 02 of the emerging Local Plan indicates that at 31 March 2017 a further 10,858 houses had been completed or committed in Breckland. By the same date a further 64 new houses had been completed or committed in Saham Toney.

Therefore in effect at 31 March 2017 there were  $(57425 + 10858) = 68283$  dwellings in Breckland; and  $(731 + 64) = 795$  in Saham Toney; meaning Saham Toney's proportion of the total dwellings was  $795 \div 68283 = 1.16\%$

By 2036 it is planned there will be a minimum of  $(57425 + 15950)$  dwellings in Breckland = **73,375**.

If the 2017 parish : district ratio were to be maintained the minimum number of houses in Saham Toney in 2036 would be  $(795 \div 68283) \times 73375 = 854$

The increase between 2017 and 2036 would thus be  $(854 - 795) = 59$

## **METHOD 8: IN ACCORDANCE WITH POLICY HOU 04 OF THE EMERGING LOCAL PLAN**

Policy HOU 04 of the emerging Local Plan allows development within and immediately adjacent to the settlement boundary of 17 rural settlements to increase by no more than 5% of the total number of dwellings inside the settlement boundary at the date of Local Plan adoption. The emerging Local Plan does not state the current total number of dwellings inside the settlement boundaries of the 17 villages, nor does it explain a method by which such totals will be calculated.

In lieu of that total for Saham Toney, we know that at the 2011 census there were 731 dwellings in the Neighbourhood Area. Between the March 2011 census and 31 December 2017 the following new dwellings were committed or completed in the Neighbourhood Area as evidenced by planning applications and appeals:

3PL/2016/0766/F Appeal: 10 3-bed dwellings	Mill View: Not started
3PL/2016/0284/O Appeal: 1 4-bed dwelling	Richmond Road: Not started
3PL/2016/0012/O: 1 3-bed dwelling	Cranford, Ovington Road: Not started
3PL/2015/0944/F: 1 3-bed dwelling	Green Acre, Chequers Lane: Started, not complete
3PL/2015/0879/O: 4 4-5 bed dwellings	Homelands, Ploughboy Lane: Not started
3PL/2015/1334/F: 1 3-bed dwelling	Rear of 84 Richmond Road: Started, not complete
3PL/2015/0242/F: 1 3-bed & 4 4-bed dwellings	Stanway Farm, Chequers Lane: Work on one property started
3PL/2015/0134/F: 1 3-bed dwelling	Mill Corner, Cley Lane: Complete
3PL/2014/0602/F 1 3-bed & 2 4-bed dwellings	Grey's Farm, Hills Road: Complete
3PL/2014/0149/F: 1 2-bed dwelling	The Oval: Complete
3PL/2013/1097/F: 1 2-bed dwelling	Werf House, Ovington Road: Complete
3PL/2013/1001/F: 1 3-bed dwelling	Bowers, Richmond Road: Complete
3PL/2013/0869/F: 29 dwellings: 2 1-bed, 6 2-bed, 7 3-bed & 10 4-bed houses; 2 1-bed & 2 2-bed flats	Warwick Farm, Cley Lane: Complete including 12 social rented properties
3PL/2012/0310/F: 1 3-bed dwelling	Ploughboy Lane: Started, not complete

TOTAL: 64 dwellings committed, of which 36 have been completed at 31 December 2017

Hence at 31 December 2017 there were 731 + 36 dwellings in the Neighbourhood Area = 767.

The number within the settlement boundary will clearly be less than 767, but based on that conservative total<sup>2</sup> the development limit within and adjacent to the settlement boundary = 5% x 767 = **38**

<sup>1</sup> This superseded permitted application 3PL/2015/0450/O

<sup>2</sup> Only 6 of the houses completed between 2011 and 2017 were inside the settlement boundary and an approximate count of buildings outside the settlement boundary using the local ordnance survey map indicates that these total no fewer than 60. Hence a more accurate estimate of dwellings within the settlement boundary would be 767 - (36-6) -60 = 677; and 5% of 677 = 34, indicating a conservatism of 4 dwellings or 10.5% in the result above.

## METHOD 9: USING THE BRECKLAND STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT REVIEW FOR SAHAM TONEY

Until September 2016 the emerging Local Plan classified Saham Toney as a Local Service Centre and hence the parish was included in the district strategic housing land availability assessment review in 2014. That review assessed 21 potential sites (see Evidence Map E1.1) in the Neighbourhood Area and concluded that of those 6 were "suitable and achievable" for development. The review concluded that those 6 sites had a constrained development capacity of 90 new dwellings.

Since the time of the review 29 houses have been completed on site ST01 (equal to its constrained capacity)

Hence the remaining constrained capacity = 90 - 29 = **61**

The subsequent reclassification of Saham Toney as a rural settlement with boundary in September 2016 indicates that the development constraints are greater than were considered in the review. Hence it is reasonable to suggest that were the review to be repeated now the constrained capacity would be fewer than 54. This can most easily be demonstrated by applying a key criteria of emerging Local Plan policy HOU 04, that developments immediately adjacent to the settlement boundary shall not exceed 5 dwellings, to the 5 remaining sites that were deemed suitable in the 2014 assessment:

Site ST05 SHLAA constrained capacity: 10;

Site ST06 SHLAA constrained capacity: 10;

Site ST09 SHLAA constrained capacity: 10;

Site ST10 SHLAA constrained capacity: 21;

Site ST14 SHLAA constrained capacity: 10;

Site ST06 is outside but not immediately adjacent to the settlement boundary and so must be discounted as it

does not comply with the emerging Local Plan. Sites ST05, ST09, ST10 and ST14 are outside but immediately adjacent to the settlement boundary. Applying the 5 dwelling limit criteria to those four sites results in a revised constrained capacity of  $4 \times 5 = 20$

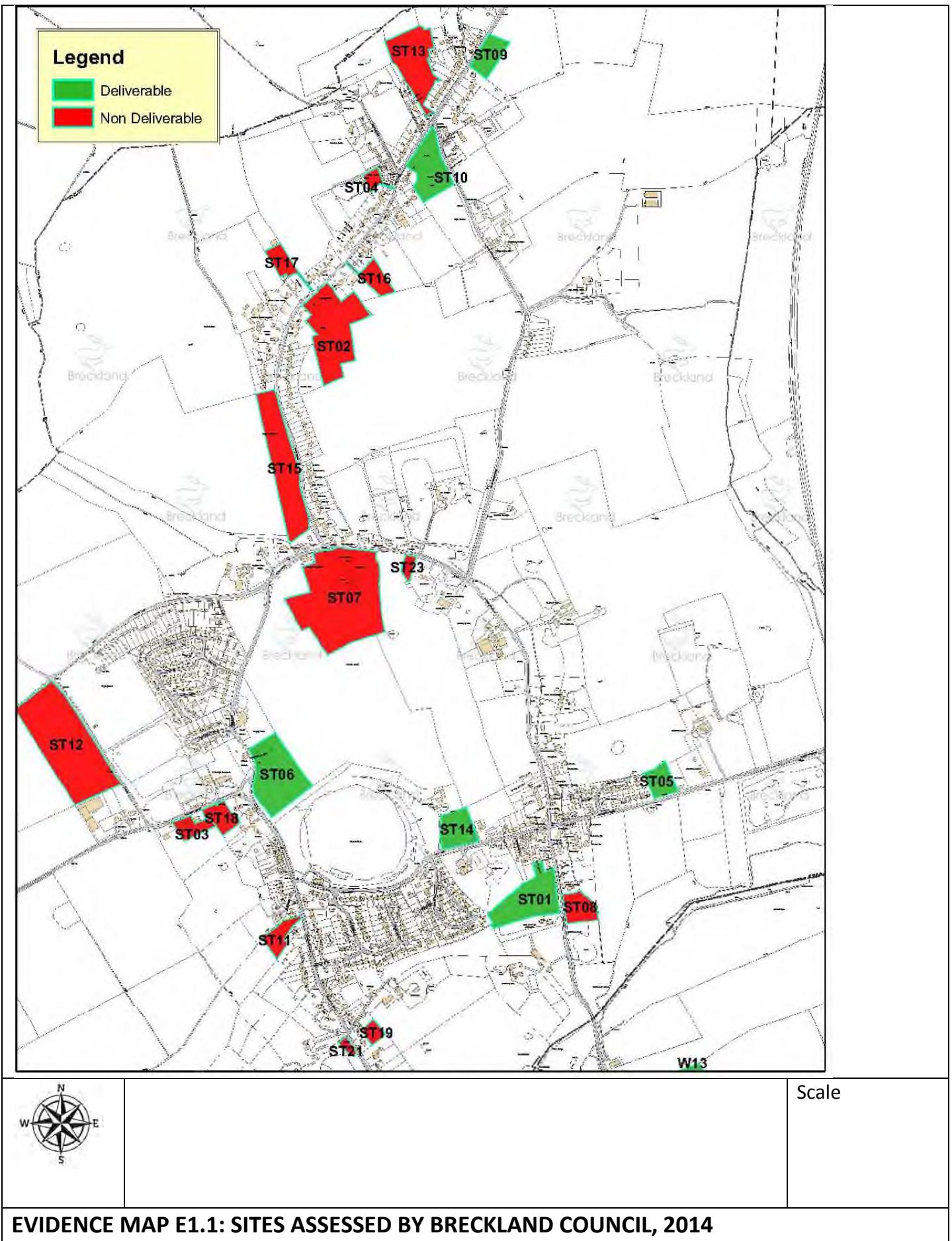
Furthermore planned development on site ST05 will only comprise 3 dwellings (Source: developer presentation to Parish Council meeting November 2017).

Hence the adjusted constrained capacity for suitable and compliant sites =  $20 - 5 + 3 = 18$

## **METHOD 10: USING JUNE 2016 POPULATION ESTIMATE EXTRAPOLATED TO 2036**

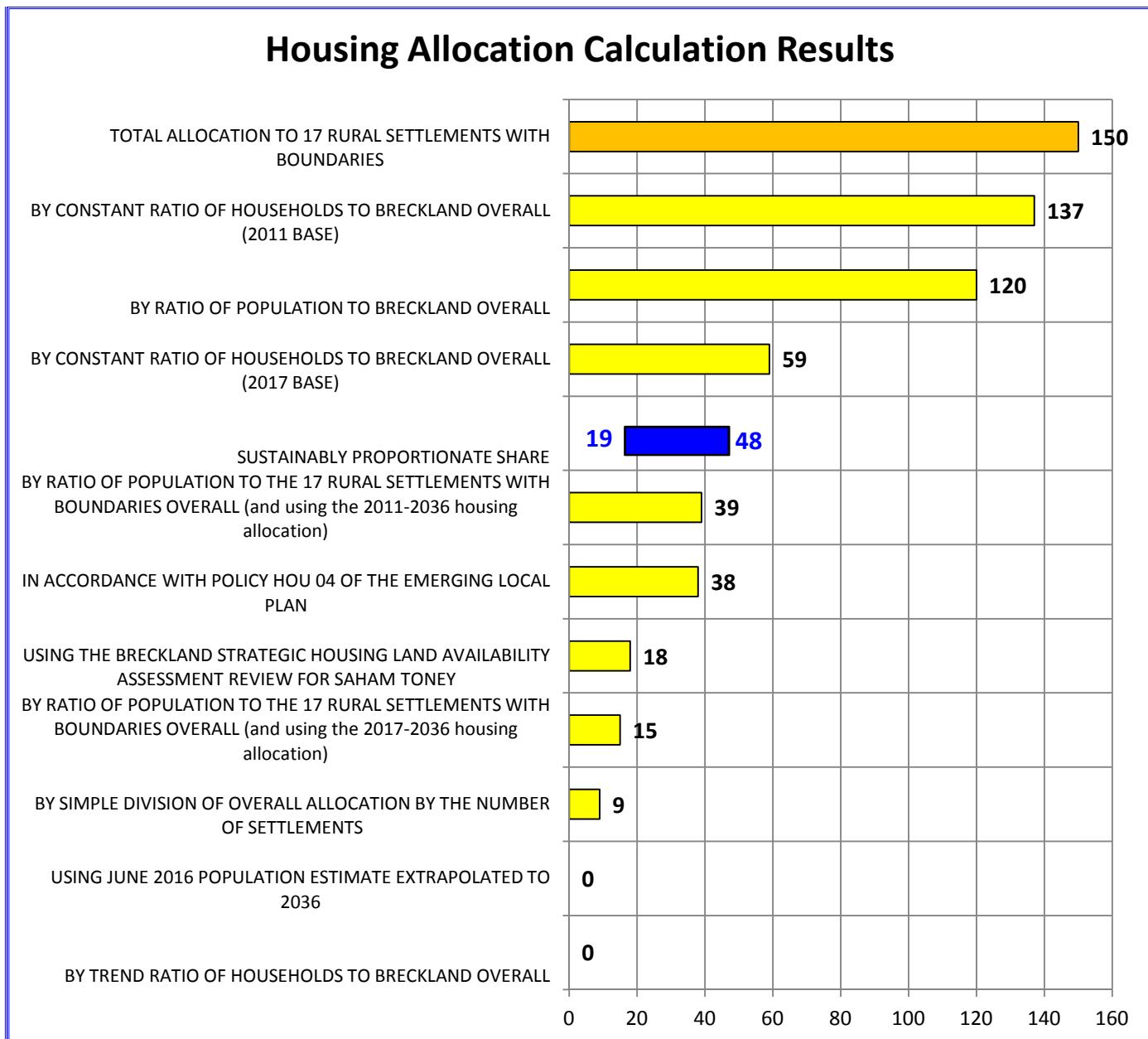
Norfolk County Council's Norfolk Insight database provides an estimate of Saham Toney's population at 30 June 2016 as 1534; an increase of 27 over the 5 years from the 2011 census. If this growth rate continued over the full period of the Local Plan it may be assumed that Saham Toney's population in 2036 will be  $1507 + (27 \div 5) \times 25 = 1642$ . Based on 2011 census data the number of people per dwelling in Breckland was  $130491 \div 57425 = 2.27$ . Applying this ratio to Saham Toney's estimated population in 2036 results in the number of Saham Toney dwellings in 2036 =  $1642 \div 2.27 = 723$

This would be less than the 731 dwellings at 2011 census, indicating **zero** growth



### 3. INTERPRETATION OF CALCULATION RESULTS

3.1 The results of the ten calculation methods are shown in the chart below.



3.2 It is considered that the two calculation methods that result in zero allocations should be discounted, as should the over-simplistic arithmetic division of overall target by number of settlements.

3.3 It is also noted that between the census of 2001 and that of 2011 Breckland's population increased from 121,427 to 130,491, an increase of 7.46%, while over the same period Saham Toney's population decreased from 1565 to 1507, a decrease of 1.76%. This would seem to indicate that calculations based on population ratios are conservative.

3.4 The 5% criteria specified in policy HOU 04 of the emerging Local Plan may be considered to set an upper bound and has been shown in calculation method 7 to result in 38 additional houses in the Neighbourhood Area (with conservatism in the order of 10%)

3.5 This leaves us with results of 15, 18 and 38. Hence a sustainably proportionate share in the range **15 - 38** would seem most appropriate.

3.6 However it is noted that while not yet enacted in planning regulations, the Government's consultation proposals "Planning for the right homes in the right places", September 2017, proposed an adjustment factor be applied to household projections to account for market signals.

3.6.1 The Breckland household projection 2011-2036 = 15,928

3.6.2 The proposed adjustment factor =  $1 + \{[(\text{Local affordability ratio} - 4) \div 4] \times 0.25\}$

3.6.3 The median local affordability ratio for Breckland is 8.19 (source: Office for National Statistics online dataset "Ratio of House Price to Workplace Based Earnings", March 2017, resulting in an adjustment factor of 1.261875

3.7 Applying this adjustment to the calculated sustainably proportionate share results in a range of 19 - 48.

3.8 An upper bound of 48 new homes is conservative for these reasons:

- a. The Government's proposals would not immediately apply to Breckland, since Breckland Council submitted the Local Plan for examination prior to the 31 March 2018 cut-off date;
- b. If applied in accordance with the Government's proposal, Breckland's minimum housing need (as taken from the Office for National Statistics data) would be multiplied by the market signals factor, then in turn distributed in accordance with the settlement hierarchy. the result would be as follows:
  - i. Office for National Statistics household projection for Breckland = 54,744 (2011) and 67,797 (2036); giving an increase of 13,053 households over the period of the Local Plan;
  - ii. Market signals factor = 1.261875, as calculated above;
  - iii. Adjusted housing need =  $13053 \times 1.261875 = 16,471$ ;
  - iv. 7% allocation to Rural Settlements With Boundaries (in accordance with the emerging Local Plan) =  $0.07 \times 16471 = 1153$ ;
  - v. Completions / commitments 2011 - March 2017 taken from Policy HOU 02 of the emerging Local Plan = 902
  - vi. Remaining allocation =  $1153 - 902 = 251$
  - vii. Saham Toney's proportionate share applying calculation method 4 =  $251 \times (1507 / 15318) = 25$
- c. Saham Toney's affordability ratio is lower than the Breckland figure. The Breckland Council Housing Dashboard, which provides housing profile statistics for the district, states the Saham Toney ratio is 7:1. If that figure is applied in the calculation of the market signals factor (see 3.6), the result is a factor of 1.19375. If applied to the range given in 3.5 this would result in a proportionate share ranging from 18 to 45.

3.8 The emerging Local Plan allocates 150 new homes to 17 Rural Settlements With Boundaries, including Saham Toney. The calculated share of up to 48 new homes represents 32% of that total. Since Saham Toney's population is 10% of the total for the 17 settlements it is reasonable conclude this exceeds the Local Plan's implied allocation to the Neighbourhood Area.

3.9 The term "limit" is deliberately not used since 48 homes is not an upper limit. Policy 1 allows that figure to be exceeded subject to caveats and is therefore fully in accordance with the National Planning Policy Framework, particularly paragraph 14.

## **4. CONCLUSIONS**

### **4.1 THE SAHAM TONEY SUSTAINABLY PROPORTIONATE SHARE WILL BE SET AS A RANGE BETWEEN 19 and 48 NEW DWELLINGS.**

4.2 Since the calculated proportionate share has been shown to include significant conservatism by comparison both with the emerging Local Plan, and with the latest Government proposed standard approach for establishing housing need, it may be concluded that the requirements of P1.4 for developments that result in that share being exceeded to provide additional community benefits are fully justified.





**Saham Toney Parish Council 12 March 2018**