

EVIDENCE BASE

FOR THE SAHAM TONEY NEIGHBOURHOOD DEVELOPMENT PLAN 2018 - 2036



VOLUME 3

REASONED JUSTIFICATION FOR POLICY 2A: SCALE & LOCATION OF RESIDENTIAL DEVELOPMENTS

REGULATION 14 PRE-SUBMISSION

PUBLICATION

TABLE OF CONTENTS

1. EVIDENCE FROM THE EMERGING LOCAL PLAN AND ITS SUPPORTING DOCUMENTS...	2
2. DEVELOPMENT WITHIN THE SETTLEMENT BOUNDARY	3
EVIDENCE MAP E2A.1: SAHAM TONEY SETTLEMENT BOUNDARY.....	4
3. DEVELOPMENT IMMEDIATELY ADJACENT TO THE SETTLEMENT BOUNDARY.....	5
EVIDENCE MAP E2A.2: NEIGHBOURHOOD AREA AGRICULTURAL LAND CLASSIFICATION	6
4. APPROACH TO BROWNFIELD SITES	6
5. COMMUNITY BENEFIT.....	7
6. COMMUNITY SUPPORT.....	7

1. EVIDENCE FROM THE EMERGING LOCAL PLAN AND ITS SUPPORTING DOCUMENTS

1.2 Breckland Council's document "Statement of Community Involvement" states: "A Neighbourhood Plan can decide where and what type of development can happen in the neighbourhood". Policy 2A follows this principle.

1.2 Strategic objective 4 in Section 1.41 of the emerging Local Plan recognises a need for "...small scale and appropriate development in rural areas...". Policy 2A supports and adheres to such a level of development, and in so doing seeks to avoid an unsustainable level of development which would be in conflict with both national policy and the emerging local Plan.

1.3 Principle 5 of policy Gen 1 of the emerging Local Plan supports proportionate growth in rural areas. Policy 2A of this Plan is based on the same principle and is therefore justified.

1.4 Section 2.52 of the emerging Local Plan notes that further development within settlement boundaries is "acceptable in principle". This caveat must be taken to mean such development is not acceptable in all cases without question and therefore policy 2A is justified in defining reasonable criteria to be used to decide such proposals, particularly their scale. This approach is supported by Breckland Council's document Locational Strategy, Level and Location of Growth and Rural Areas, July 2016, which states "It should be noted that any land that has been included within the boundary line does not have an automatic guarantee of approval of planning permission" and further notes that not all sites within the settlement boundary will be suitable for development since other material considerations including highways and access, landscape, flood risk, biodiversity and impact on built heritage remain as part of the assessment process.

1.5 Section 3.16 of the emerging Local Plan states that rural settlements "would not be appropriate for the allocation of larger market developments". This justifies Policy 2A's criteria relating to the scale of development in the Neighbourhood Area.

1.6 Section 3.17 of the emerging Local Plan confirms that "inside of the settlement boundaries of the existing rural settlements there are limited (development) opportunities". Given this fact, which certainly applies to Saham Toney, it is reasonable and justified for Policy 2A to apply acceptance criteria to such development.

1.7 In the reasoned justification of Policy HOU 04 given in Section 3.18 of the emerging Local Plan it states "the level of new development permitted in settlements defined in the policy will be restricted...". Since by definition a Local Plan must be sustainable and in general conformance with the National Planning Policy Framework, it follows that it must be acceptable to specify reasonable and compatible criteria to manage the scale of development in the Neighbourhood Area, and this, in part, is what Policy 2A seeks to do. Therefore the principle of Policy 2A is justified.

1.8 In the section of the emerging Local Plan titled "Principles of New Housing" it is stated that a particular consideration of that Plan is to "Deliver housing that meets the needs... whilst recognising the need for small scale and appropriate development in rural areas to support rural communities and services." This clearly recognises that scale of development is a sustainability issue in rural settlements and hence the use of scale-focused criteria in Policy 2A must be deemed both sustainable and acceptable.

1.9 The emerging Local Plan does not make clear that Policy HOU 11 applies to Rural Settlements With Boundaries. Implementation guidance for Policy 2A clarifies that it does.

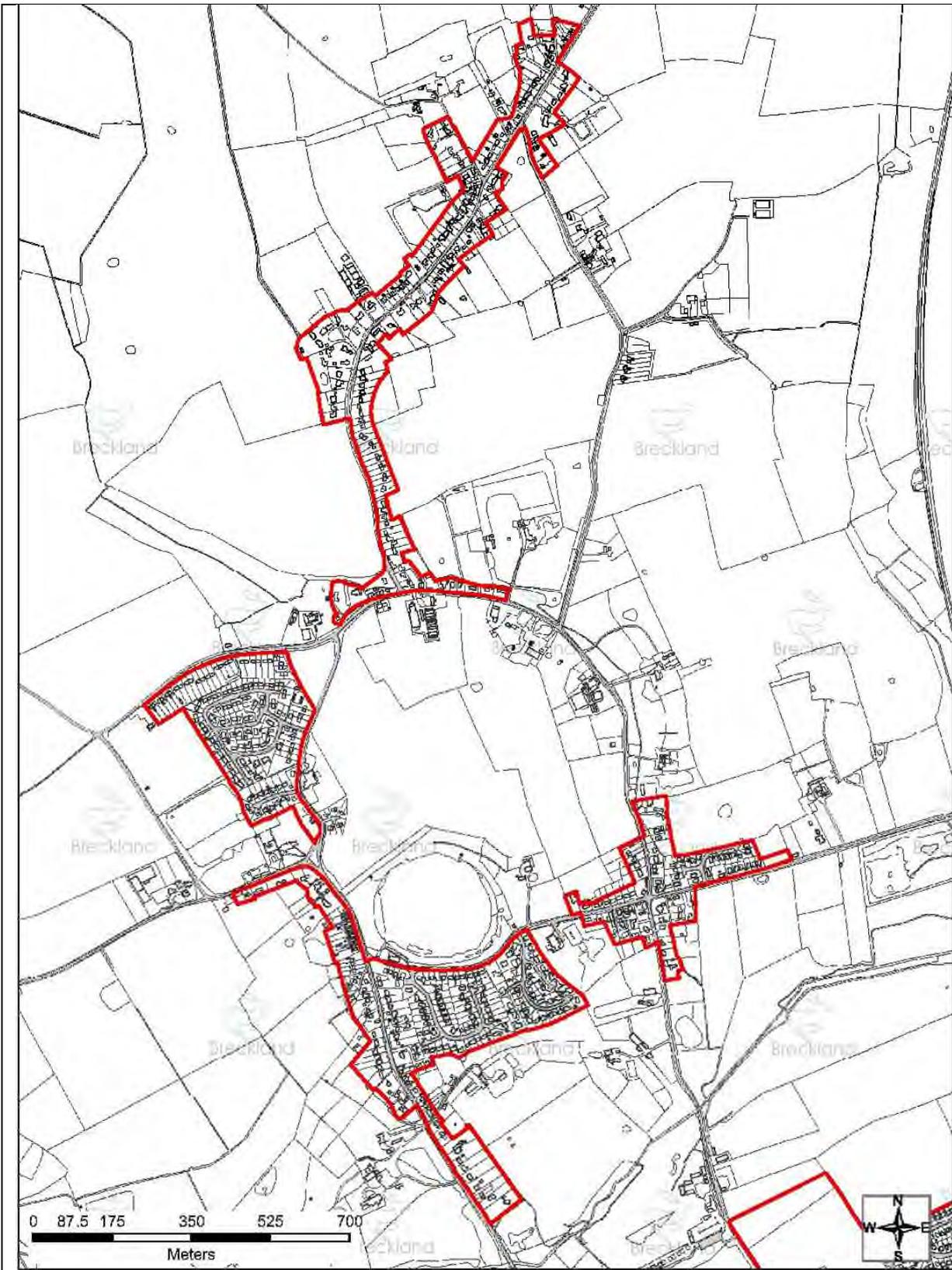
1.10 Breckland Council's document "Locational Strategy, Level, Location of Growth and Rural Areas", 11 July 2016 proposes the use of a criteria-based approach for development proposals immediately adjacent to the settlement boundary. This justifies the Neighbourhood Plan's overall approach of giving greatest weight to a consideration of development constraints for the Area. The document also states that such development is intended to apply where there is "local desire for further development to take place". This fully justifies Policy 2A's requirement for such proposals to demonstrate tangible community benefits, and for such development to satisfy a housing needs assessment specific to the Neighbourhood Area.

2. DEVELOPMENT WITHIN THE SETTLEMENT BOUNDARY

2.1 Evidence Base Volume 1: Saham Toney's Key Development Constraints, explains the limited service provision in the Neighbourhood Area. The principles of sustainability dictate that there must be an adequate level of service provision to support all new development. In this context an "appropriate" level of services, facilities and infrastructure to serve a development shall be determined by giving full consideration to the relevant constraints set out in Evidence Base - Volume 1 and listed below:

- a. Availability and accessibility of services and facilities;
- b. Roads and public transport.

2.2 Development proposals within the settlement boundary (shown on Evidence Map E2A.1) shall only be supported if they comply with all other relevant national, district and neighbourhood plan policies, and critically, on a criteria-based assessment, do not contravene the Neighbourhood Area's key development constraints, as set out in Evidence Base Volume 1. This approach is supported by Breckland Council's Locational Strategy, Level & Location of Growth and Rural Areas, July 2016.



COPYRIGHT
 This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Breckland District Council licence no.100019835. Published 2017.



Source: Emerging Local Plan

Scale: as shown

EVIDENCE MAP E2A.1: SAHAM TONEY SETTLEMENT BOUNDARY

3. DEVELOPMENT IMMEDIATELY ADJACENT TO THE SETTLEMENT BOUNDARY

3.1 With regard to the Neighbourhood Area's key development constraints, in line with the Breckland Spatial Development Strategy and Settlement Hierarchy, and Saham Toney's classification as a rural settlement with boundary in that hierarchy, the level of new residential development permitted will be managed and controlled.

3.2 Limiting new developments to 5 dwellings is in accordance both with the results of community consultation and Policy HOU 04 of the emerging Local Plan.

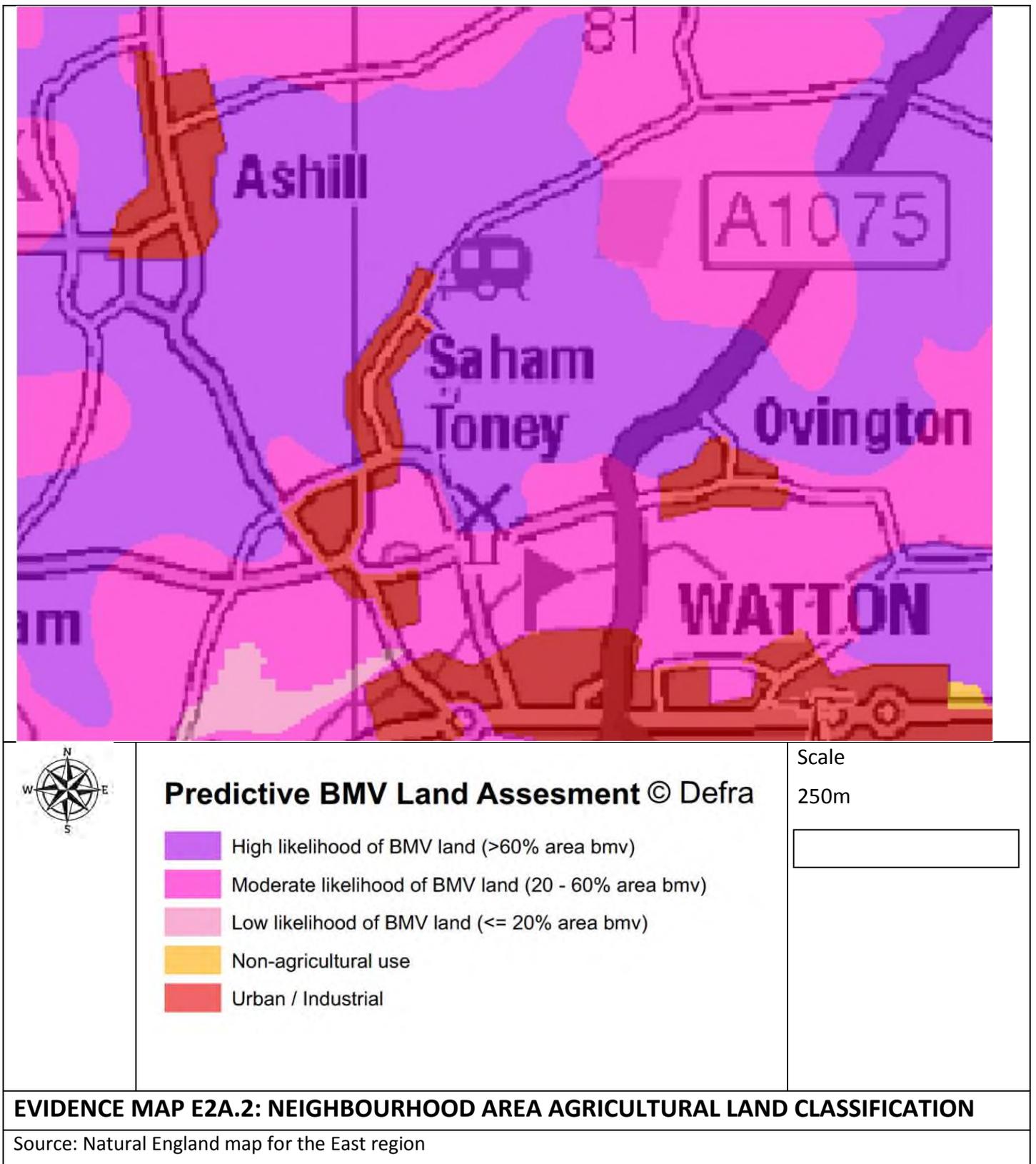
3.3 Evidence Base Volume 1: Saham Toney's Key Development Constraints, explains the limited service provision in the Neighbourhood Area. The principles of sustainability dictate that there must be an adequate level of service provision to support all new development. In this context an "appropriate" level of services, facilities and infrastructure to serve a development shall be determined by giving full consideration to the relevant constraints set out in Evidence Base - Volume 1 and listed below:

- a. Availability and accessibility of services and facilities;
- b. Roads and public transport.

3.4 Management and control of "backland" development is justified by the statement in the Breckland Settlement Fringe Landscape Assessment July 2007: "Where linear development extends as a single line along the road, backland or infill development would create a more solid defined settlement edge, with loss of permeability and views out. Generally, the loose, informal character of Saham Toney is considered to be sensitive to further development which would create a more consolidated settlement form."

3.5 Justification of community benefit criteria is discussed in Section 5.

3.6 With regard to the use of agricultural land for development, Annex 2 of the National Planning Policy Framework defines "best and most valuable agricultural land" as land in grades 1, 2 and 3a of the Agricultural Land Classification. Paragraph 112 requires Local Planning Authorities to take into account the economic and other benefits of such land, and requires areas of poorer quality land to be used in preference to that of a higher quality. Hence Policy 2A dictates that land is classed as Grade 1 in the Agricultural Land Classification shall not be used for development unless it is as a rural exception site. Evidence Map E2A.2 is a local extract of the Agricultural Land Classification Map for the East region. On the map areas shown as having a high likelihood of BMV (best and most valuable) land equate to Grade 1 land in the Classification.



4. APPROACH TO BROWNFIELD SITES

4.1 This Neighbourhood Plan broadly supports the Government's approach to development which includes a preference for brownfield sites. For example the White Paper "Fixing Our Broken Housing Market", February 2017 includes a proposal to maximise the re-use of brownfield sites. Policy 2A incorporates this support by allowing a greater level of development on suitable brownfield sites than on greenfield sites.

4.2 In applying criteria for development of brownfield sites, the definition of a brownfield site shall be taken as that given in the glossary of the emerging Local Plan, but with the addition of sites on which there are redundant

agricultural buildings (subject to evaluation against heritage considerations) and which are no longer used for agricultural purposes and with the exclusion of both residential gardens and sites which are considered as in-fill. It is considered that where a site comprises redundant agricultural buildings and is no longer used for agricultural purposes it may provide a viable opportunity for development that could be pursued in preference to greenfield site development, providing such buildings were not considered to be heritage assets. Hence for the purposes of this Plan the Local Plan definition is extended to include this situation.

4.3 Given that larger developments may be permitted on brownfield sites it is reasonable to require tangible benefit in return for this concession. Hence in addition to the requirements of Policy 8 for no development to increase the risk of surface water flooding, brownfield developments are required to achieve a decrease in the prior flood risk.

5. COMMUNITY BENEFIT

5.1 The specified criteria for development proposals to provide community benefit is consistent with that required by Policy HOU 04 of the emerging Local Plan but the requirement is more explicitly defined and therefore more robust allowing it to be more reliably implemented.

5.2 The emerging Neighbourhood Plan allows some development immediately adjacent to a settlement boundary; something that would otherwise not normally be permitted. It is clear this provides great benefit to developers, including a likely significant increase in the value of land adjacent to a settlement boundary. It is therefore entirely reasonable to expect a tangible benefit for the community in return. Policy HOU 04 of the emerging Local Plan requires such development to provide a significant community benefit. In accordance with the principles of Localism, Policy 2A more fully defines such benefit in the specific context of the Neighbourhood Area. Since the requirements are more explicitly defined they are therefore more robust allowing more reliable implementation.

5.3 The housing need criteria stated are fully justified in Evidence Base Volume 4 which demonstrates that the Neighbourhood Area lacks smaller homes for older people and affordable homes for those who otherwise do not have the means to purchase a property.

6. COMMUNITY SUPPORT

6.1 The extent of development in the Neighbourhood Area is important to parishioners, as evidenced by the consultation responses summarised below:

Consultation event	Number stating a preference for either no new development or a limit of 5 houses	Number stating a preference simply for "small-scale" development	Number stating a preference for development to be limited to 5 - 10 houses
Postal questionnaire to all parishioners, July 2015	33	61	5
Postal questionnaire to all parishioners, October 2016	210	174	3
Questionnaire to parish businesses and organisations, late 2016	13	0	0
Information recorded by attendees at Saham Toney fete, July 2016	2	0	0
TOTALS	258	235	8

This page is deliberately blank



Saham Toney Parish Council 12 March 2018