

EVIDENCE BASE

FOR THE SAHAM TONEY NEIGHBOURHOOD DEVELOPMENT PLAN 2018 - 2036



VOLUME 5

REASONED JUSTIFICATION FOR POLICY 3: DESIGN OF RESIDENTIAL DEVELOPMENTS

REGULATION 14 PRE-SUBMISSION

PUBLICATION

TABLE OF CONTENTS

1. GENERAL PRINCIPLES	2
2. EVIDENCE FROM THE EMERGING LOCAL PLAN AND ITS SUPPORTING DOCUMENTS & THE NATIONAL PLANNING POLICY FRAMEWORK.....	6
3. DENSITY OF NEW DEVELOPMENTS.....	7
EVIDENCE MAP E3.1: DENSITY AREAS FOR THE SETTLEMENT OF SAHAM TONEY.....	8
EVIDENCE MAP E3.2: DENSITY AREAS FOR THE SETTLEMENT OF SAHAM HILLS	9
4. DESIGN BODY EVIDENCE	9
5. DARK SKIES	10
6. COMMUNITY SUPPORT	12

1. GENERAL PRINCIPLES

1.1 Development in Saham Toney has taken place gradually over many centuries, much of it in times when there were no planning regulations. As a result, rather than a single distinctive style of housing, what contributes most to the distinctiveness of the Neighbourhood Area's built environment is the variety of styles that have evolved over time. This is demonstrated by the photos given below. As a result the design of new developments should aim to harmonise with what else is in their near vicinity. Off-the shelf designs used regularly in other places outside the Neighbourhood Area should not be used, and site designers should visit the area to examine its character and feel before "putting pen to paper".









1.2 With respect to materials, again there is no one group of common items, but red brick walls are predominant, followed by yellow brick, rendered and painted and flint stone. The majority of roof tiles are red clay or concrete, although the most recent developments have tended to use black tiles to quite good effect. Window frames are usually white or of stained wood.

1.3 In setting design criteria Policy 3 is fully in accordance with the principle of maintaining the Neighbourhood Area's unique character, something that is supported by both national and district planning policies.

1.4 Residential amenity includes overshadowing / loss of light, loss of outlook (but not view), dominance (the extent to which a new development adversely impinges on the immediate aspect or outlook from an adjoining property), noise and general disturbance, particularly in the late evening when there is an expectation that

surrounding background noise will remain low, overlooking and loss of privacy, and reasonable space between buildings.

2. EVIDENCE FROM THE EMERGING LOCAL PLAN AND ITS SUPPORTING DOCUMENTS & THE NATIONAL PLANNING POLICY FRAMEWORK

2.1 Strategic objective 6 of the emerging Local Plan is "to encourage high quality, sustainable and safe design for places and spaces...which respects the character and local distinctiveness of Breckland's communities". Strategic objective 13 of the emerging Local Plan is to "promote a safe and healthy environment, and high quality design minimising the impacts of development and ensuring quality of life and sense of place". Policy 3 defines criteria that seek to achieve this objective and build further on the design criteria set out in Policy COM 01 of the emerging Local Plan.

2.2 The principles of Policy 3 are further supported by paragraphs 2.5, 2.6, 7.4 to 7.7, 7.9 and 7.23 of the emerging Local Plan and by paragraph 56 of the National Planning Policy Framework.

2.3 Policies GEN 2, HOU 10, COM 01 and COM 03 of the emerging Local Plan are supported and in this context Policy 3 seeks to reinforce district policy and define additional criteria more specific to the Neighbourhood Area.

2.4 Among other criteria, Policy TR 02 of the emerging Local Plan requires developers to:

- i. "Provide safe, suitable and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design and layout";
- ii. "Avoid inappropriate traffic generation and compromising highway safety".

Policy 3 introduces specific criteria to help address the above.

2.5 Policy ENV 07 of the emerging Local Plan offers the highest level of protection, among other things, to the setting of designated heritage assets. Policy ENV 08 of the emerging Local Plan expects development to conserve the setting of non-designated heritage assets. Paragraph 128 of the National Planning Policy Framework states: "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of details should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary." The setting of a heritage asset shall be taken as the definition given in the glossary of the National Planning Policy Framework, i.e. "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

Policy 3 links this protection to those buildings defined in Policy 6 of this Plan.

2.6 Paragraph 6.91 of the emerging Local Plan recognises the general tranquillity of the Breckland countryside and Policy 3 includes criteria to protect and preserve that.

2.7 Policy COM 03 of the emerging Local Plan gives regard to noise nuisance and artificial light pollution. Policy 3 includes specific criteria to address these issues in the context of the Neighbourhood Area.

2.8 In the Government White Paper "Fixing Our Broken Housing Market", February 2017 it states "The Government proposes to amend the National Planning Policy Framework to:

- a. Expect that local and neighbourhood plans (at the most appropriate level) and more detailed development plan documents (such as action area plans) should set out clear design expectations following consultation with local communities, and strengthen the importance of early pre-application discussions between applicants, authorities and the local community about design and the types of homes to be provided; and

- b. Recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles. These principles are crucial to the success of a scheme, but often get less attention than what a house looks like. They should be reflected in plans and be given sufficient weight in the planning process."

2.9 National Planning Policy Framework paragraph 125 states "By encouraging good design, planning policies and decisions should limit the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation". Policy 3 regarding protection of dark skies is fully justified by this.

2.10 The Breckland Settlement Fringe Landscape Assessment defines two areas of the Neighbourhood Area as highly sensitive to further development. This is discussed in detail in Evidence Base Volume 1: Saham Toney's Key Development Constraints and justifies policy criterion P3.1 (m) which seeks to safeguard the rural setting of those two areas.

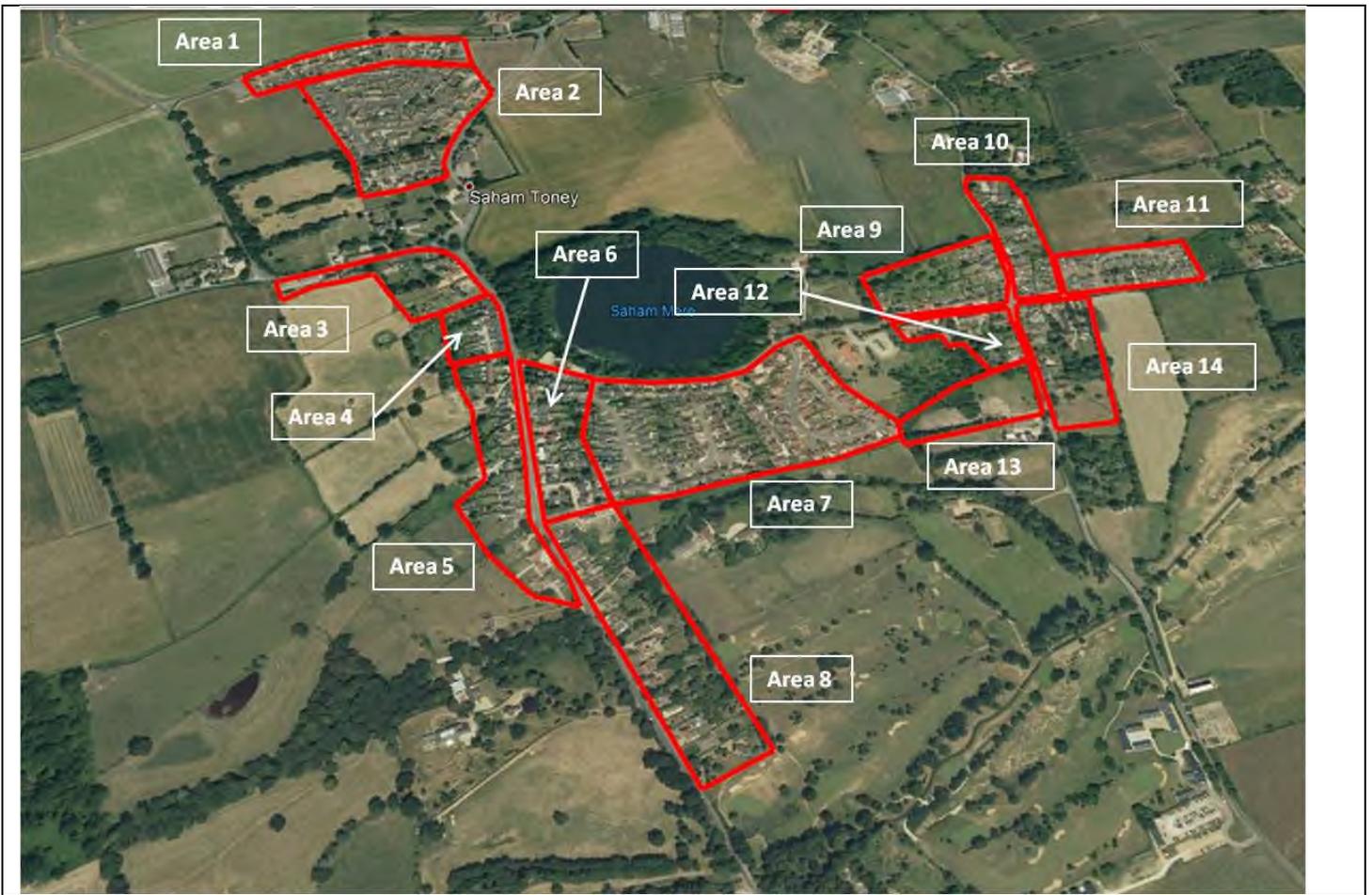
3. DENSITY OF NEW DEVELOPMENTS

3.1 Policy HOU 06 of the emerging Local Plan allows for lower density development in rural locations and at the edges of settlements. This is considered adequate evidence for criteria (d) of Policy 3 which sets a density limit of "approximately 20", which is well above the general density of the majority of existing housing in the Neighbourhood Area (as evidenced below) but allows flexibility to vary this to a small degree.

3.2 The density of residential housing varies across the Neighbourhood Area: for example along the south-eastern part of Richmond Road it is around 5-10 dwelling per hectare; on the recent Warwick Farm development of 29 houses on Cley Lane it is 22-23 dwellings per hectare; on older cul-de-sac developments at Amy's Close it is around 15 and the Oval around 11; in some parts of Hills Road it is as low as 7, in others around 12. There are no areas of higher density. This is considered adequate evidence for criteria P3.1 (b) which allows suitable flexibility in the context of existing dwelling densities. Evidence Maps E3.1 and E3.2 sub-divide the Neighbourhood Area into its main developed areas and Table E3.1 gives the housing densities of each of those areas.

Area Number	Area (hectares)	Approximate count of dwellings	Approximate Density (dwellings per hectare)
1	2.15	29	13.5
2	5.61	72	12.8
3	1.62	12	7.4
4	0.76	14	18.4
5	2.36	27	11.4
6	1.75	22	12.6
7	6.14	100	16.3
8	3.13	23	7.4
9	1.98	15	7.6
10	1.52	17	11.2
11	1.39	23	16.5
12	1.00	12	12.0
13	1.27	29	22.8
14	1.92	14	7.3
15	5.43	39	7.2
16	5.10	42	8.2
17	3.43	30	8.8
18	2.28	15	6.6
19	0.65	8	12.3
ALL	49.49	543	11.0

TABLE E3.1: APPROXIMATE HOUSING DENSITIES BY AREA



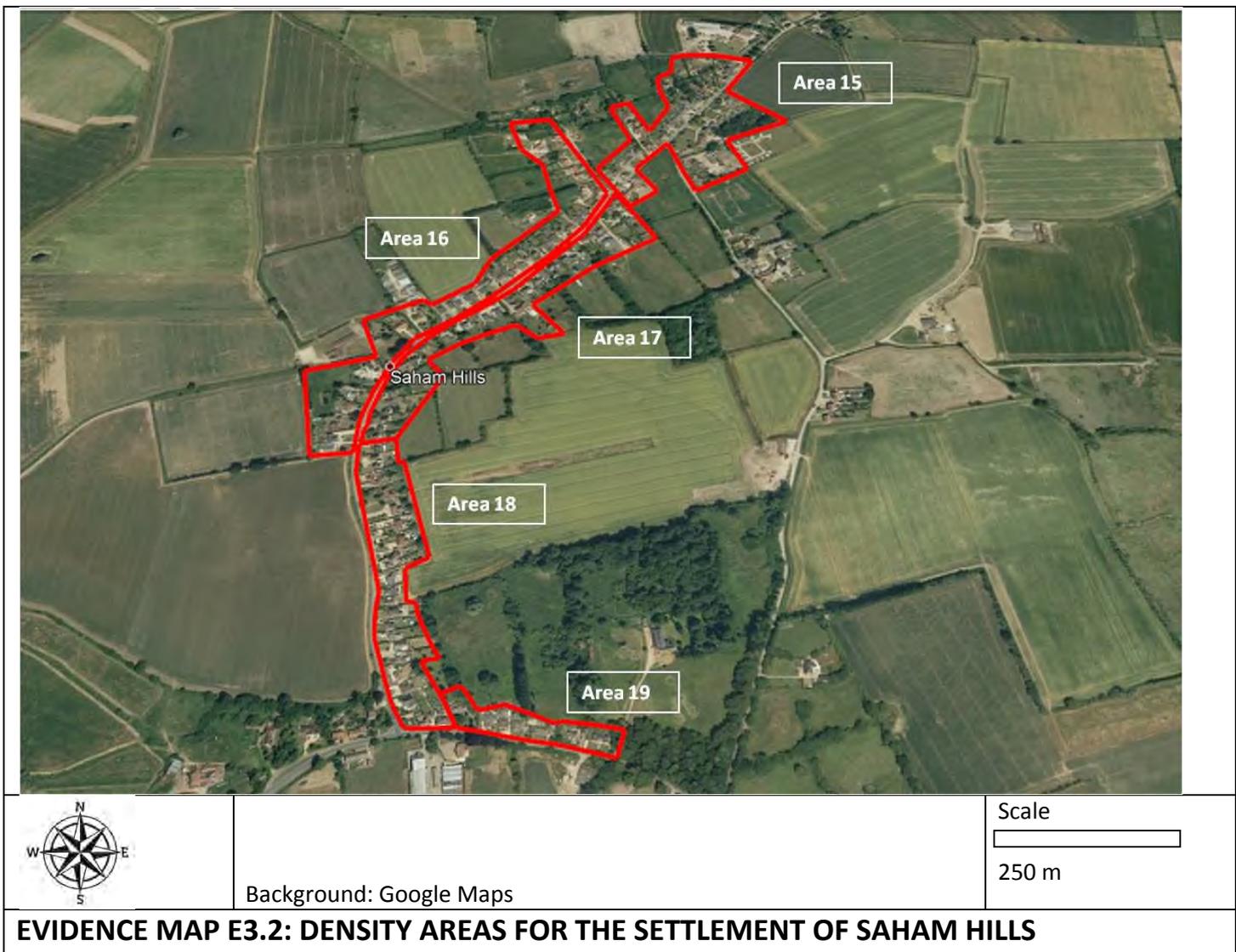
Background: Google Maps

Scale



250 m

EVIDENCE MAP E3.1: DENSITY AREAS FOR THE SETTLEMENT OF SAHAM TONEY



EVIDENCE MAP E3.2: DENSITY AREAS FOR THE SETTLEMENT OF SAHAM HILLS

4. DESIGN BODY EVIDENCE

4.1 The organisation CIBE (Chartered Association of Building Engineers) is a public body that is the Government's advisor on architecture, urban design and public space. Its technical background paper "Improving The Quality of New Housing", 2010, includes the following statements that help to justify Policy 3:

- "The last decade has seen a surge in the public interest in the design of their homes, but also their wider neighbourhoods. But even a decade ago an overwhelming 81 per cent of people said they are 'interested in how the built environment looks and feels' and 85 per cent of people agreed with the statement 'better quality buildings and public spaces improve the quality of people's lives' and thought that the quality of the built environment made a difference to the way they felt.";
- "New developments should respect their context, using it as a starting point to enhance local character. If new housing connects physically and socially to the surrounding built environment and landscape, it is more likely to have a strong, positive identity."

4.2 CIBE research on the value of a sensitive approach to the design and layout of development showed that, in all types of development, good urban design:

- adds economic, social and environmental value and does not necessarily cost more or take longer to deliver;
- delivers high investment returns for developers and investors by meeting a clear occupier demand that also helps to attract investors.

Since Policy 3 embodies such an approach it will result in these benefits and is therefore sustainable, viable and not restrictive.

4.3 As recommended by CABI, new developments should respect their context, using it as a starting point to enhance local character, and connect physically and socially to the surrounding built environment and landscape, in order to have a strong, positive identity. Since Policy 3 embodies such an approach it will result in these benefits and is therefore sustainable, viable and not restrictive.

4.4 "Building for Life 12" is the national standard for well designed homes and neighbourhoods, promoting design excellence and celebrating best practice in the house building industry. Building for Life assessments consider the design quality of planned or completed housing developments against the 12 Building for Life criteria; based on aspects which outline a development's contribution to and relationship with the local environment and community, its character, the layout of streets and needs of pedestrians and car users, and the design and construction of homes. Using this approach ensures an objective and consistent means of assessment. Additionally the use of Building For Life 12 is supported in the Government's White Paper "Fixing our Broken Housing Market", February 2017, as one of a series of measures to strengthen neighbourhood planning and design.

4.5 Suggested acceptable walking distances are given in "Providing For Journeys on Foot" by the Chartered Institution of Highways and Transportation, as follows:

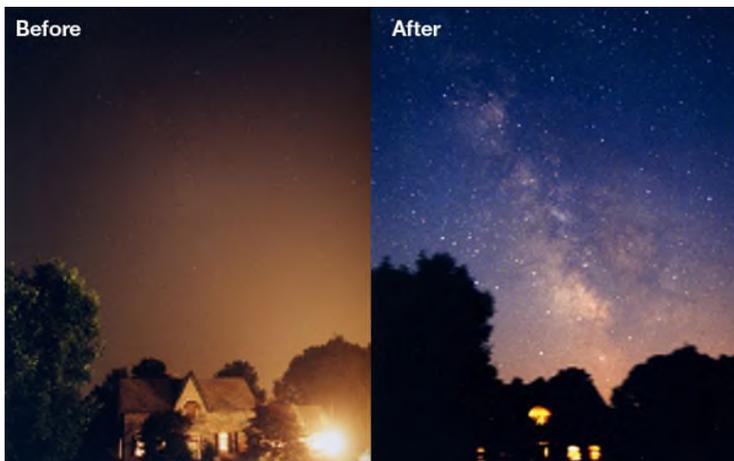
	Town centres (m)	Commuting, school, sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

5. DARK SKIES

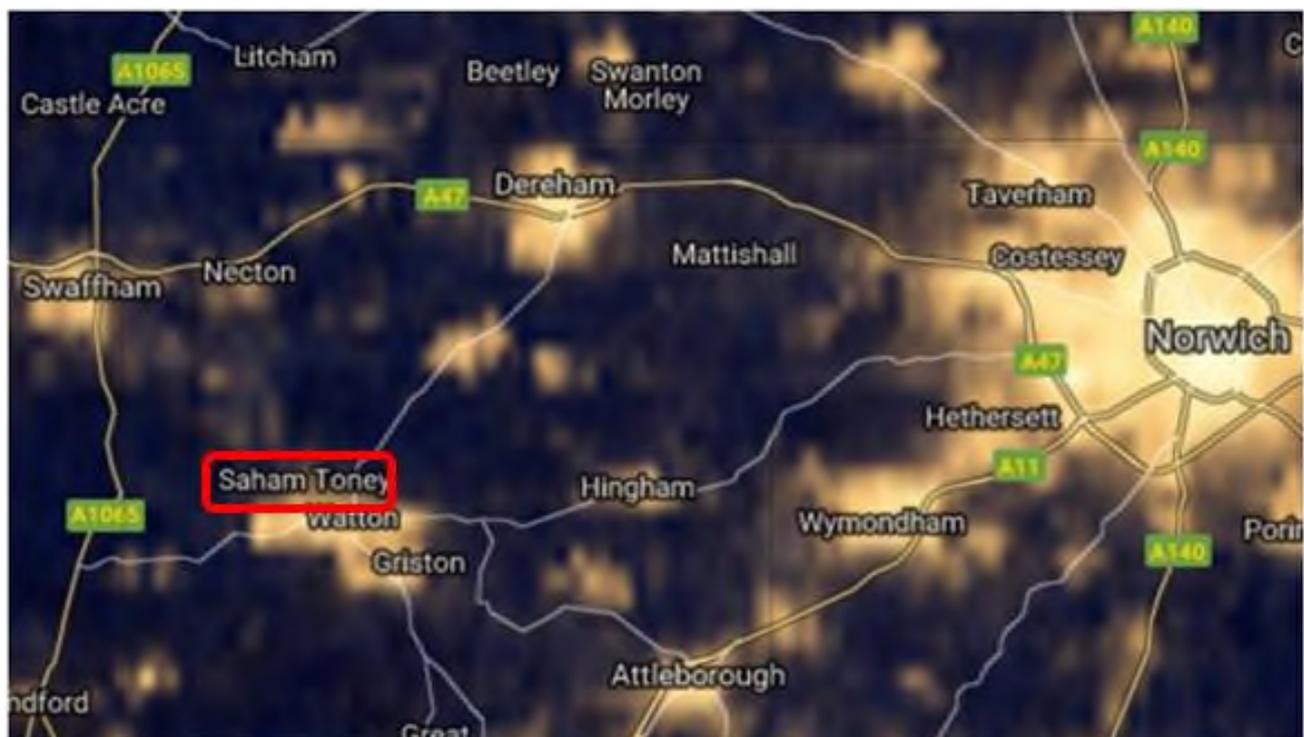
5.1 Light pollution can include:

- Glare – excessive brightness that causes visual discomfort;
- Sky-glow – brightening of the night sky over inhabited areas;
- Light trespass – light falling where it is not intended or needed;
- Clutter – bright, confusing and excessive groupings of light sources.

5.2 According to the 2016 "World Atlas of Artificial Night Sky Brightness," 80 percent of the world's population lives under sky-glow, and in Europe 99 percent of the public can't experience a natural night. Saham Toney residents are fortunate to be in the 1% who can and this statistic shows how valuable dark skies are. The difference can be striking as shown by the photos below (not of the Neighbourhood Area) which show a night sky before and after a power cut that affected street lighting:



5.3 The extract given below from the interactive online map of night lighting given at <https://blue-marble.de/nightlights/2012> shows a very distinct difference between the night sky in Saham Toney and that in neighbouring Watton, and it is this difference Policy 3 seeks to preserve.



5.4 In its 2016 paper "Night Blight: Mapping England's Light Pollution and Dark Skies" the Campaign for the Protection of Rural England recommends that Local Authorities "should develop policies to control light pollution in local plans which will ensure that existing dark skies are protected, and that new developments do not increase local light pollution". The Saham Toney Neighbourhood Plan supports this recommendation and considers it justifies inclusion of dark skies criteria in Policy 3.

5.5 Light spilling up into the night sky is a waste of money and energy: local councils were estimated to spend £613 million on street lighting in 2014-15 – and the lights can account for between 15-30% of a council's carbon emissions. (Reference: Department for Communities and Local Government "Local Authority Revenue Expenditure and Financing England: 2014 to 2015 Budget"). Hence measures to restrict and control street lighting are economically justified.

5.6 Advances in lighting technology mean that upward light pollution can be minimised without compromising road safety or increasing crime. (Reference: London School of Hygiene & Tropical Medicine "The Effect of Reduced Street Lighting on Road Casualties and Crime in England and Wales: Controlled Interrupted Time Series

Analysis", 2015). Therefore it is fair and reasonable to require developers to adopt use of such advanced technology should they consider street lighting of a development to be justified. In order not to be restrictive Policy 3 recognises that developers may be able to present solutions based on current or future technology that would allow a site to be lit at night without creating light pollution outside or above the site.

5.7 Light pollution has harmful effects on wildlife and ecosystems and hence it is justifiable to seek to avoid it.

5.8 Policy 3 regarding lighting is justified on the basis of health considerations: glare from poorly shielded outdoor lighting is harmful to health, because it decreases vision by reducing contrast. This limits the ability to see potential dangers at night. Aging eyes are especially affected and the Neighbourhood Area has a higher than average proportion of older residents (as demonstrated in Evidence Base Volume 4). "Glare from night time lighting can create hazards ranging from discomfort to frank disability." (Quote from the American Medical Association Council on Science and Public Health, 2012).

5.9 There is no clear scientific evidence that increased outdoor lighting deters crimes. It may make people feel safer, but has not been shown to actually make them safer. A 2015 study published in the Journal of Epidemiology and Community Health found that streetlights do not prevent accidents or crime, but do cost a lot of money. The researchers looked at data on road traffic collisions and crime in 62 local authorities in England and Wales and found that lighting had no effect, whether authorities had turned them off completely, dimmed them, turned them off at certain hours, or substituted low-power LED lamps. According to the study, "When risks are carefully considered, local authorities can safely reduce street lighting saving both costs and energy ... without necessarily impacting negatively upon road traffic collisions and crime."

5.10 Saham Toney Parish Council has not in the past, nor will in the future support the introduction of street lighting. The only street lighting at present in the Neighbourhood Area is limited to a small development on Amy's Close, which was objected to by the Parish Council but was accepted and is maintained by Norfolk County Council. This development is not a main route through the parish. By restricting street lighting Policy 3 seeks to protect Saham Toney's dark skies, which if once lost, will never be regained.

6. COMMUNITY SUPPORT

6.1 One hundred and eleven parishioners who responded to consultations valued the peaceful nature of the parish and wish to maintain it. Therefore Policy 3 is justified in seeking to prevent any increased noise levels as a result of development.



Saham Toney Parish Council 12 March 2018