

SAHAM TONEY NEIGHBOURHOOD DEVELOPMENT PLAN

JUSTIFICATION OF A MINIMUM HOUSING TARGET FOR THE NEIGHBOURHOOD PLAN

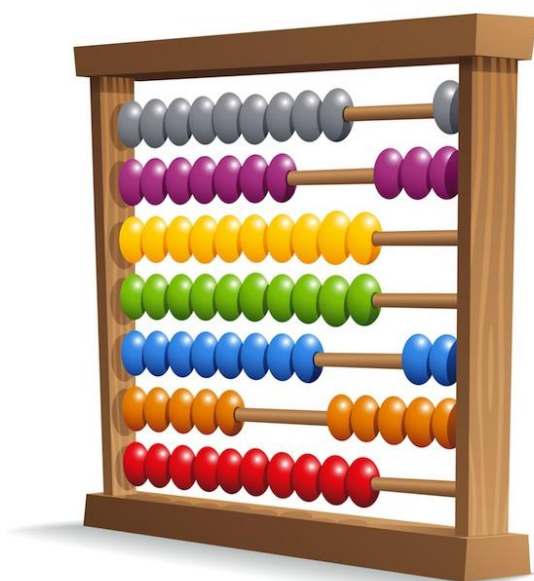


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1.0 INTRODUCTION AND POLICY CONTEXT

1.1 The Saham Toney Neighbourhood Plan allocates nine residential sites, which are expected to bring forward a total of 70 new dwellings over the full Plan period till 2036.

1.2 Adopted Local Plan Policy HOU04 allows for appropriate development immediately adjacent to the settlement boundary in Saham Toney so long as it would not lead to the number of dwellings in the settlement increasing by significantly more than 5%. Appendix 5 to the Local Plan clarifies that a 5% increase in Saham Toney equates to 33 additional dwellings and refers to the 33 as being a housing target. Breckland planning policy officers have confirmed through emails that this figure of 33 is the housing requirement figure (as per paragraph 65 in the National Planning policy Framework 2019) for the Saham Toney Neighbourhood Plan during the plan period.

1.3 Importantly, the housing target of 33 is not an absolute limit. The term ‘significantly’ in the wording of the Local Plan policy is not defined in numerical terms and hence is subject to some interpretation.

1.4 Adopted Local Plan Policy GEN 05 Settlement Boundaries allows, in principle and subject to meeting other Local Plan policies, for new development to come forward within the defined Saham Toney settlement boundary.

1.5 Seven of the allocated sites, which together account for 61 dwellings, are outside, but immediately adjacent to the settlement boundary, and in that sense comply with Local Plan Policy HOU 04 ‘Villages with Boundaries’. Of the other two allocated sites both sit partly within the settlement boundary and partly outside (i.e. immediately adjacent). In one of those cases the site layout proposed results in all 3 houses being inside the boundary. In the other case, there is as yet no site layout, but examination of the site boundary suggests no more than 2 of the proposed dwellings could be located within the settlement boundary. Hence the allocation of sites results in 65 houses outside but immediately adjacent to the settlement boundary, and 5 houses within the settlement boundary.

Local Plan Policies GEN 05 and HOU 04 are given in Appendix 1 for convenient reference.

2.0 THE LOCAL PLAN MINIMUM HOUSING TARGET

2.1 Policy HOU 04 ‘Villages with Boundaries’ of the Breckland Local Plan, (with Appendix 5 of that plan), allows for appropriate development outside but immediately adjacent to existing settlement boundaries of ‘Villages with Boundaries’ so long as the overall number of dwellings in the village does not

significantly exceed 5% of the total number of homes in the settlement as at the time the Local Plan was adopted (November 2019). Appendix 5 to the Local Plan clarifies that a 5% increase for Saham Toney would be an additional 33 homes.

2.2 Policy HOU 04 provides a ball-park figure for growth in Saham Toney of a minimum of 33 homes. The 5% increase specified in Policy HOU 04 is not a percentage increase informed by site specific circumstances in Saham Toney. In practice planning applications will be determined on a site by site basis and assessed against a range of other policies in the Local Plan. The Saham Toney Neighbourhood Plan seeks to add value to this Local Plan context by planning in a more certain way for the growth that is appropriate to take place in Saham Toney.

2.3 An important starting point is an evaluation of the minimum number of 33 which is described as a housing target for Saham Toney in Appendix 5 to the Local Plan- There are two effects which would indicate a need to increase this minimum figure:

2.3.1 An increased household projection for the Breckland District via projections published by the Government in September 2018, accounted for as follows:

- a) The dwellings anticipated to be delivered through Policy HOU 04 of the Local Plan are part of Breckland Council's overall "Objectively Assessed Need" (OAN) of 15298 dwellings. That is derived from a previous Government household projection estimate, published in 2016 and based on 2014 data, which showed there would be 67,797 dwellings in the district in 2036. The latest projection estimate, published in September 2018 and based on 2016 data, showed an increase in that total to 68,588 dwellings. Using the later estimate the projected increase over the period of the Local Plan (2011-2036) has risen from 13,053 to 14,066.
- b) Applying adjustments to the new figure in the same way as done in the Central Norfolk Strategic Housing Market Assessment 2017, Breckland's full OAN would now be 16,311. Based on the previous OAN of 15,298, Policy HOU 02 of the Local Plan, which allocates a total of 16,630 new dwellings, shows an 8.7% buffer against the OAN. Measured against a potentially increased OAN, the buffer is reduced to 1.9%. It can reasonably be assumed that were the increased OAN to be applied, the buffer should not be less than it is for the present OAN. Applying an 8.7% buffer to a potentially revised OAN of 16,311 results in a total allocation across the district of 17,730. To be conservative it is proposed that a 10% buffer should be applied, as being more in accord with planning guidance. Applying that buffer results in a total allocation across the district of 17,942.
- c) A simple, but reasonable way to determine how this might affect Saham Toney's minimum expectation of growth is to make a pro-rata increase. Hence a revised minimum allocation is: $(33 \times 17942) / 16630 = 35.6$; set at 36.

2.3.2 The application of an adjustment factor of approximately 1.33 to reflect the disparity between average salaries and average house prices in the Breckland District (the affordability factor set by Planning Practice Guidance), as calculated below:

- a) Government Planning Practice Guidance, as updated in February 2019, sets out an adjustment factor to be applied to household projections to account for market signals. Due to the timing of the Local Plan's submission for examination, that Plan was covered by transition arrangements for the application of revised NPPF requirements and was thus not required to apply the

adjustment. However, when the Local Plan is subsequently updated (planned for 2021), it will be required to do so.

- b) The Neighbourhood Plan is not covered by the same transition arrangements, and hence it is prudent to apply the adjustment from the outset.
- c) The potentially amended Breckland household projection 2011-2036 = 16,311 (as set out in point 2.3.1 (b)).
- d) The adjustment factor = $1 + \{[(\text{Local affordability ratio} - 4) \div 4] \times 0.25\}$
- e) The median local affordability ratio for Breckland is 9.17 (source: Office for National Statistics online dataset "Ratio of House Price to Workplace Based Earnings", March 2019), resulting in an adjustment factor of 1.323.
- f) Applying this increase to the result obtained from consideration of updated household projections gives a revised minimum housing target: $36 \times 1.323 = 47.63$; set at 48.

2.4 As a result of the above adjustments, it is concluded that whilst the housing requirement figure issued by Breckland District Council to Saham Toney of 33 houses is accepted, it is considered prudent to seek a minimum of 48 additional homes to reflect existing issues relating to affordability of new homes and to future proof the Neighbourhood Plan against expected adjustments or growth projections at the more strategic level.

3.0 ASSESSMENT OF THE MINIMUM HOUSING TARGET FOR THE NEIGHBOURHOOD PLAN

3.1 When selecting sites for allocation in the Neighbourhood Plan, providing sites were shown to be suitable for development by the selection process, the aim was to allocate sites capable of delivering no fewer than 48 dwellings. Sites were deemed to be suitable for development if they achieved a positive overall score when rated against defined selection criteria. Full details of that rating are given in the Saham Toney Neighbourhood Plan Site Selection Report.

3.2 Sixteen sites were put forward for allocation via a call for sites and were independently assessed prior to undergoing a rigorous selection process. Another two sites not put forward but which were the subject of undecided planning applications at the time of the assessments, were also considered.

3.3 The process used to select sites for allocation was comprehensive, rigorous, analytical and objective. By comparison the Local Plan adopts an arbitrary basis for setting a housing target that takes no account of the sustainability or suitability for development of individual sites that may come forward. It presents no evidence to support 5% growth in each of the seventeen 'Villages with Boundaries'. In practice it is highly likely that some villages will be able to sustain higher growth levels and others lower levels. It is contended that:

- a) As a result of the two adjustments described in Section 2.0, it is appropriate to increase the minimum target for the Neighbourhood Plan from 33 to 48; and
- b) Given the very rigorous process of site assessment and site selection adopted, it is entirely justified to allocate housing in excess of the adjusted minimum target, regardless of any interpretation of Local Plan Policy HOU 04's requirement for development not to significantly increase the target, since the allocated sites have been shown to be sustainable, and the National Planning Policy Framework puts great emphasis on permitting sustainable sites.

3.4 Given the point made in 3.3 (b), as explained in 1.5, it is fully justified for the Neighbourhood Plan to allocate sites proven to be suitable for development which are expected to result in 65 new dwellings (as explained in 1.3) outside but immediately adjacent to the settlement boundary over the plan period.

APPENDIX: LOCAL PLAN POLICIES GEN 05 AND HOU 04

Policy GEN 05 Settlement Boundaries

Within the defined settlement boundaries and the boundary for Attleborough SUE (as shown on the Policies Map) proposals for new development are acceptable, subject to compliance with relevant Development plan policies.

Outside the defined settlement boundaries, development is restricted to recognise the intrinsic character and beauty of the countryside. Development outside the defined settlement boundaries will only be acceptable where it is compliant with all relevant policies set out in the development plan, including but not necessarily restricted to: (MM11)

- Policy HOU 03 - Development Outside of the Boundaries of Local Service Centres
- Policy HOU 04 – Villages with Boundaries (MM11)
- Policy HOU 05 - Small Villages and Hamlets Outside of Settlement Boundaries
- Policy HOU 08 - Provision for Gypsies, Travellers and Travelling Showpeople
- Policy HOU 12 - Conversion of Buildings in the Countryside
- Policy HOU 13 - Workers Exceptions
- Policy HOU 14 – Affordable Housing Exceptions
- Policy ENV 03 - The Brecks Protected Habitats and Species
- Policy EC 04 - Employment Development Outside General Employment Areas
- Policy EC 06 - Farm Diversification
- Policy EC 07 - Tourism Related Development

Policy HOU 04 – Villages with Boundaries

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