

South Norfolk Village Clusters Housing Allocations Plan – Parish Council Webinar (10.06.2021)

List of Questions and Answers

- 1. If we need more houses built, why do we give tax incentives through Council Tax to people who keep houses empty as second homes or completely unoccupied (there are about 1000 homes currently receiving subsidy in South Norfolk)?**

The figures for the number of properties where a Council Tax reduction is given is a snapshot at a particular point. For empty homes, the reduction can be given for a number of valid temporary reasons, such as the property is between tenants, the owner is in hospital/care, or the property is being repaired (e.g. following damage by flooding). The Council actually seeks extra Council Tax once a property has been empty for two years, on a scale which increases the longer the property is empty.

Further information is being sought from the Council Tax team re second homes discounts.

- 2. What do the colours on the Village Cluster boundaries map mean please?**

The colours are simply a way of distinguishing between adjacent Village Clusters.

- 3. Are you seeking consultation responses from parishes which are not listed e.g. neighbouring parishes which may be impacted by development in an adjacent parish which may impact on amenity use?**

Yes, any Parish or Town Council can comment on sites within any of the Village Clusters within the district. We have also notified Parish and Town Councils that are outside of South Norfolk, but adjacent to the district boundary, of this consultation.

- 4. You mention that you are looking at an allocation of 1200 homes across the villages, how are you going to ensure that this number is not significantly more?**

The 1,200 homes is the minimum requirement set out in the Greater Norwich Local Plan (GNLP) for the South Norfolk Village Clusters, and the Council is seeking to allocate a suitable number of sites to achieve this level. Currently the Regulation 18 Village Clusters Plan includes Preferred Sites for 1,150 dwellings, plus an expectation that a further 100 will be allocated in Parishes undertaking a Neighbourhood Plan. Further development will also come forward on smaller windfall sites, over and above those allocations. The intention of producing a Plan is precisely to manage the process of housing delivery, but as the requirement is a minimum there is scope for it to be exceeded.

- 5. As the consultation allows for more sites to be put forward by developers etc and they are ultimately deemed suitable under the plan will there be any chance for villages to then make comments on them? For example if the village believes the site to be unsuitable.**

The next stage of consultation in relation to the Village Clusters Housing Allocations Plan will be the formal Regulation 19 (or 'pre-submission' stage), which we expect to undertake in early 2022. Regulation 19 is not a consultation per se but rather allows stakeholders to submit

representations in respect of whether the plan is: 1) legally and procedurally compliant; 2) Sound*; and 3) in compliance with the Duty to Cooperate. Representations made at Regulation 19 will be considered as part of the independent examination into the Plan. As such, comments can be made on the final choice of sites, at that stage, within those parameters.

*Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy.

6. Does a preferred site pretty much guarantee that planning permission will be granted?

Whilst the 'preferred sites' have been based on robust planning assessments and consultation with the relevant technical bodies, it is still possible that, as a result of this consultation and further evidence coming to the fore, particular sites may change in the way that they have currently been designated by the Council.

The allocation of a site for a particular type of development within a Local Plan document establishes that the land is suitable for the identified development and therefore gives a high degree of certainty that the land will come forward for this use. It is not however an absolute guarantee that planning permission will be granted. This is a separate process and applicants will have to ensure that they can meet the requirements of the allocation policy, or else justify any deviation through other significant material considerations. In rare cases information may come to light through the more detailed Planning Application process which means a site cannot be developed as intended.

7. In regards to site assessments, did anyone from the decision making process actually visit any of the sites? It's important to put some public comments into perspective.

Site visits were undertaken for the majority of sites, and for all sites that were Preferred or Shortlisted. In some instances the desktop assessment of a Rejected site meant that a site visit was not considered necessary. The Site Assessment Booklets (available in the background documents on the consultation webpage) contain both the desktop assessment and site visit observations for each site.

8. How is this consultation communicated to the public so that they know it is open for comment? Or is this the role of the Parish council?

Notification emails/letters have been sent to over 5,000 contacts on our Local Plan consultation database, a significant number of which are South Norfolk residents. In addition, a press release has been sent to local media, and it is understood that the EDP has already printed an article regarding the consultation. The consultation has been trailed in The Link magazine, which is distributed to households across South Norfolk. Parish councils, libraries and GP surgeries have been sent copies of publicity posters to put up and South Norfolk Council will also be producing regular social media posts regarding the consultation. The consultation is currently featured (16 June) on the front page of the Broadland and South Norfolk joint webpage.

Anything that Parish Councils can do to further spread the message of the consultation would be very much appreciated.

9. Are we all parish councillors on this event, and how many are attending, please?

Yes, the event was purely for Parish Councils. There were 44 people in attendance.

10. Which is the document that describes Design and Densities? Paul mentioned this.

There is a suggested, generic policy on Design within the draft Village Clusters Plan. This includes consideration of density, layout and massing. This is part of the Core Policies section, near the beginning of the consultation document, and you can respond on this (Question 3) and the other suggested policies.

11. Can a parish council challenge where the boundaries have been drawn on the map?

If a respondent feels that a particular Village Cluster boundary should be re-drawn, and there is convincing evidence to support this, then it can be the subject of a consultation response. It should be noted, however, that the Greater Norwich Local Plan sets out the basis for organising Village Clusters based on primary school catchments.

12. On a similar basis re empty properties... We have many commercial premises, especially retail in our towns which have been empty for significant periods and could possibly make good housing. What consideration / action is proposed by the Council when considering housing/employment/economy?

The Council needs to strike a balance between delivering housing in sustainable locations, which could include town centres or the brownfield sites of other commercial premises, and protecting the vitality and viability of those centres by not fragmenting or diminishing existing commercial uses or encouraging employment to go to more peripheral, greenfield sites.

13. Will any consideration be given to altering development boundaries? Colney has a particular problem in that approx. 2/3 of the parish is within the development boundary and 1/3 is a small settlement which lies approximately a mile west

As well as the sites put forward to us, we are seeking views on the Settlement Limits themselves (known as Development Boundaries in the current Local Plan). The Settlement Limit is important because the planning policies which apply inside the Settlement Limit are generally supportive of new development, subject to the usual Planning consideration such as design, landscaping, access, neighbour amenity etc., whereas, outside Settlement Limits more restrictive planning policies are applicable.

We have already suggested amendments to Settlement Limits to reflect development which has happened since they were last defined in the 2015 Local Plan, or where an extension is proposed to accommodate a smaller, windfall site. However, we are asking whether you agree with these proposed changes and/or whether there are further changes we should make?

It should be noted that Settlement Limits for Colney are dealt with under the GNLP.

14. How do Parishioners access all this information if they do not have internet abilities?

In our publicity (letters, press release, posters) we have included a phone number for people to ring if they are having any difficulties viewing any of the material or responding to the

consultation online. They then have the option of making an appointment to come into the Council offices to view the documents, or there may be an option to send certain items through the post. Over 200 of the notifications that were sent out were by post, to those who don't have (or have chosen not to use) email addresses.

15. Can you clarify again please 'proxy for social sustainability'?

Social sustainability is a critical component of a community's wellbeing and longevity. A community is composed of people as well as the places they live; it is as much a social environment as a physical environment. Therefore, communities must not only be environmentally sustainable, they must also be socially sustainable.

The Village Cluster boundaries have been defined based on groups of villages that share a range of services and facilities, which new development could reasonably be expected to support. However, they have predominantly been defined on the basis of primary school catchment areas, which are considered to provide a consistent local point of reference for social sustainability.

16. Is the number handed down by central government?

The principal aim of the Village Clusters Plan is to allocate a series of smaller sites to accommodate a minimum of 1,200 new homes across the villages within South Norfolk, in accordance with the requirements of the GNLP. The GNLP identifies how many homes overall need to be built between 2018 and 2038 across Broadland, Norwich and South Norfolk, and this number is calculated using the Governments standard methodology for determining Local Housing Need.

17. To what extent has the plan considered the impact on the road infrastructure in the district council area?

As the Assessment of Sites section of the Regulation 18 document notes, a Technical Consultation was undertaken as part of the Site Assessment process. This involved seeking an overview of all of the sites from Norfolk County Council as Highways Authority, followed by a series of detailed meetings looking at the potential Preferred and Shortlisted sites, to ensure that they were acceptable from a Highways perspective.

18. How advanced are the developers plans with such things as proposed access to the sites?

It should be noted that not all sites are promoted by a developer or even have a developer on board. The level of detail submitted to the Council varies across different sites, as detailed plans are not a requirement at this stage.

However, each site has undergone a site assessment by the Council to determine whether it is considered to be suitable for development. As part of this process access is considered and where sites that cannot achieve a safe and suitable access through means of an existing or proposed upgrade (as discussed with NCC Highways, see Q17 above) then a site was not Preferred or Shortlisted.

The assessment of sites was also supported by a technical consultation with both internal consultees on landscape, heritage and environmental protection issues, as well as a range of

external stakeholders, on issues such as highways, utilities and minerals and waste. The comments received by these consultees has fed into the conclusions for the site, where some design/layout features have been highlighted. However, it is expected that further comments will be provided in response to this consultation which will influence developer's layout.

19. Who is responsible for assuring there is sufficient services for any new development, doctors, dentist, schools, energy supplies etc.

Most of the allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale. Therefore, in many instances this type of development is unlikely to have a material impact on existing infrastructure and services e.g. this scale of development is unlikely to be an issue for energy suppliers. Some services like shops and pubs may benefit from additional customers.

The Council is however engaging with a number of service providers as part of the production of the plan, this includes the Clinical Commissioning Group, Norfolk County Council in its role as Education, Highway and Lead Local Flood Authority and Anglian Water. This will ensure that infrastructure issues are identified and understood as part of the plan making process.

The development of certain sites will require some local infrastructure upgrades, for example an extension of a footway to link the site to the village. The current consultation offers people the opportunity to indicate where there are specific requirements needed to enable the development of a particular site to happen.

All of the planned developments will also need to contribute to Community Infrastructure Levy (CIL) and, in certain circumstances, contribute to infrastructure through S106 agreements. These contributions can be used to help ensure local infrastructure effectively supports growth.

20. Longer term, once this plan and GNLP are final, will hitherto unconsidered sites be allowed for development or if a site is not in GNLP or this plan, does that mean that a site won't be considered for the lifetime of the plan?

The Planning system remains 'plan led', i.e. decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, the general presumption is that most sites not included in the GNLP or Village Clusters Plan will not gain planning permission. There are exceptions to this, including: if a 5-year supply of deliverable housing sites cannot be demonstrated; if a site comes forward for affordable housing to meet a specifically identified local need; or, if it is a small site (up to 5 dwellings), which meets the criteria of the windfall policy in the emerging GNLP. Both the GNLP and Village Clusters Plan run to 2038, however the expectation of Government is that they will be reviewed regularly (approx. every five years), and if a further need for housing is identified, then other sites might need to be allocated – however, that would follow a similar process of consultation and engagement as the current GNLP/Village Clusters Plan.

21. Primary schools have been used to identify a 'cluster village' has any account been taken of the current and forecasted capacity of the school? And indeed the current utilisation?

The assessment of sites was supported by a technical consultation with both internal and external stakeholders. This technical consultation also included discussions with NCC Children's

Services, where information was shared on School capacity. However, it has been identified that given that allocations proposed within the Village Cluster Housing Allocations Plan are relatively small scale, therefore in many instances this type of development is unlikely to have a significant impact on school capacity.

It is expected that further detailed technical comments on these issues will be provided in response to this consultation.

22. Does South Norfolk have a policy on preserving green space between distinct settlement areas?

Whilst there is no direct policy that relates to 'green space' in this context, the Council recognises the need to protect the surrounding open countryside from inappropriate development. Policy DM 1.3 – 'The sustainable location of new development', within South Norfolk Council's adopted Development Management Policies Document (2015), encourages development within Development Boundaries/Settlement Limits and is more restrictive for land falling outside of these boundaries. Some specific areas which are subject to the greatest development pressures, in the A11 and A47 corridors, have additional policies to protect the areas between settlements.

This policy is also in accordance with the National Planning Policy Framework (NPPF), paragraph 7, which promotes sustainable development.

23. Development around the UEA complex was a major contributory factor in flooding downstream on the Yare in Keswick last Christmas and the year before. Are you looking at the impact development will have on flooding in neighbouring areas? The whole of Norfolk is now very vulnerable to flooding.

Yes, as part of the evidence base for the VCHAP the following documents have been prepared and will be used to guide development:

- Greater Norwich Water Cycle Study (March 2021), which indicates that sites in some Village Cluster locations may need to be phased in order for infrastructure to be suitably upgraded prior to development (it is likely that a specific supplement to the Water Cycle Study will be needed at the Regulation 19 stage of the Village Clusters Plan); and
- The Level 1 Strategic Flood Risk Assessment (November 2017), which has been used as part of the Village Clusters Site Assessment Process.

In addition to the above documents and as part of the Regulation 18 consultation, the Lead Local Flood Authority (LLFA) will be consulted, in order to provide updated comments on the sites put forward.

24. Down the line when you have all the sites agreed, are you able to prescribe to developers who come forward that they adhere to carbon neutral, green, environmentally sound practices in their developments?

The current consultation includes a section on Core Policies, which would apply to all of the proposed allocations/windfall sites, and on which comments are being sought. In addition to these and the allocation-specific policy wording in the Village Clusters document, each allocation

will be subject to assessment of local and national policies which look to promote energy efficiency, such as Policy DM 1.4 'Environmental quality and local distinctiveness', in the Adopted South Norfolk Development Management Policies (2015) which aims to promote and achieve high quality and positive environmental improvement.

Other policies include Joint Core Strategy Policy 1 'Addressing climate change and protecting environmental assets', and Policy 2 'Promoting good design' and their proposed replacements in the emerging GNLP.

However, many of the standards for construction are set nationally through Building Regulations and Local Plans can only seek to exceed these in exceptional circumstances, where the evidence justifies this – such as the water standards in the current JCS.

25. In regards to the preferred site allocation was consideration given to the proximity of public transport? Some of the preferred sites that I have seen are remote enough from public transport that people will just use their cars for transport.

The starting point for site assessments is the Village Clusters Site Assessment Criteria (which form the basis of the assessments in the Site Assessment Booklets in the consultation supporting documents). The Site Assessment Criteria include assessing the proximity of sites to a range of services and facilities, including public transport, and where possible, development will be preferred in areas where there is good accessibility to these local services and facilities. However, it is acknowledged that not all village clusters will benefit from the same range of services, this is largely due to the rurality of South Norfolk and the smaller scale of many villages. It is therefore common for residents to rely on having a car for some everyday journeys. Paragraph 103 of the National Planning Policy Framework (NPPF) recognises this, noting that: *'opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making'*.

26. Where do GP's fit in with the picture of sustainability? As these are thinner spread than schools?

The NHS has programmes in place to address the current pressures on healthcare services. This includes new ways of working, use of new technology, and recruiting more staff. Locally too, NHS organisations under the Norfolk and Waveney Sustainability and Transformation Partnership (STP), are finding ways to help keep people well, expand healthcare services, and to ensure services are better coordinated.

The Norfolk Health Protocol is a collaboration and engagement protocol between local planning authorities, the Norfolk and Waveney STP, clinical commissioning groups, health partners and Public Health Norfolk which seeks to plan for future growth and to promote wellbeing. By working together with local planning authorities NHS organisations can be clear about the locations and timing of new housing and jobs, and this enables informed decision-making about how and when to expand health facilities.