

VCHAP Parish Councils Briefing (26.01.2023) – Questions and Answers

Questions/Comments from Zoom Chat

1. Will screens be sent out to us please?

Yes, this has already been done.

2. If the plan is adopted - what timescales are you expecting the development work to start in?

This will depend largely on the aspirations of the particular site owner/promoter. For some sites (e.g. Gillingham) a planning application has already been submitted, whilst some of the 2015 Local Plan allocations are being carried forward into this plan, as they have not yet been developed nearly 8 years after being allocated. Further work to understand the site promoters' aspirations will be undertaken alongside the Regulation 19 process, to give the Planning Inspector the confidence that sites will be delivered during the plan period (to 2038).

3. Can any member of the public add comments to any section of the document ?

Yes, there are comment points beside every paragraph and policy of the document in the online consultation. Comments will need to address Legal Compliance and the Tests of Soundness, and suggest how the VCHAP should be modified to make it compliant.

4. I have asked by email why we were never informed about the site that has been suggested for Little Melton - it was not one of the sites in the 2021 consultation and we learnt about it via the EDP. Officers reported on the site a year ago. Surely we should have been given an opportunity to comment on the site? I have not received a reply to my email.

5. Woodton Parish Council was working on the allocations and recommendations from Aug 2021 for 2 approved sites and it seems that in May 2022 these were superseded, and one larger development replaced these. Why were we not consulted at this stage and what is the 'new evidence from the promoter'?

This response relates to both questions 4 and 5. The new sites submitted during the Regulation 18 consultation were published on the Council's website as part of a progress update to members in November 2021. The assessment of the sites was initially undertaken in 2021, but this has been part of an ongoing process, involving a Technical Consultation with service providers, regulatory bodies, utilities etc. and the preparation of supporting evidence, such as Landscape and Visual Assessments, Heritage Statements, Strategic Flood Risk Assessments etc. The decision to include new sites, or revise existing sites, was not formalised until the decisions made by councillors at January committees (the agendas for which were reported in the EDP). Therefore, it was not possible to consult prior to that point. Should parishes disagree with the choices, they can make representations on soundness/legal compliance as part of the Regulation 19 process.

Regarding the Woodton sites, the fact that one larger site could replace the option of splitting development over three smaller sites was clearly flagged up in the Regulation 18 document. The additional new evidence from the site promoter concerned their ability to improve connectivity between the primary school/recreation ground and the rest of the village and also the opportunity for other community benefits to be delivered by the site, which were flagged up in their Regulation 18 response, but which needed further clarification to establish likely deliverability.

6. As a Village (Thurlton) we had 30 houses added from the last round of housing (within last 5 years) and now are being tagged for a further 25+ across 2 sites - how does that fit with the statement about "bringing up the villages that had had no building".

The allocation sites are located in a mix of settlements, including those that had no allocations in the 2015 Local Plan (e.g. Bressingham, Haddiscoe, Burgh St Peter, Needham etc.) and those which did (including Thurlton). Locating all of the development in villages that had no development under the 2015 Local Plan is likely to have led to larger allocations in less sustainable locations.

7. Why have sites been added without Parish Councils prior knowledge, and when was the 12 unit limit changed?

See 4. & 5. above re. adding new sites.

12 units was always the minimum size set out in the GNLP and VCHAP for a site to viably deliver infrastructure requirements, including a proportion of affordable housing, but was not a 'limit'. Sites ranging from 12 to 50 dwellings were proposed through the Regulation 18 consultation.

8. Little Melton had 350 houses and has seen 110 new houses in the last 5 years - we are now allocated 35 more. Are we a 'larger village'?

In the context of the Village Clusters Little Melton is an averagely sized village, which is well served with local facilities (primary school, well equipped village hall, pub, shop, on the Wymondham-Hethersett-NUH bus service) and within cycling distance of a wider range of services/facilities in Hethersett; therefore, the level of allocation is considered appropriate.

9. Woodton is being asked to build 50 more houses on top of 27 currently being built. This represents a 30% increase to the village size. Does this really tally with your objective 3 that the scale of the development is in keeping with the village size and the rural aspect of the location?

The Woodton site is designed to achieve benefits in terms of improved connectivity within the village and also securing a site for long term use for pre-school facilities, which has therefore justified a slightly larger allocation than might otherwise be the case. See also 5. above

10. Do parish councils have a choice of types of houses they need?

Parish Councils can seek to influence, but the mix of houses should reflect the most recent Housing Needs Assessment for the area (currently the Greater Norwich Local Housing Needs Assessment, June 2021). Parish Councils can undertake a more localised needs assessment that demonstrates a particular need, this is most often done through the Neighbourhood Plan process.

11. But you are not investing in the villages which don't have the facilities - instead still concentrating on those which are fortunate to have some - which will further exacerbate the 2 tiers we are already seeing.

The level of housing being promoted through the VCHAP is highly unlikely to support new facilities, although it may support localised improvement (e.g. highways improvements, new open spaces etc.); however, it may contribute to the continued viability of those services and facilities which already exist.

12. Do parish councils have any input on which builders can be chosen?

No, and neither does the District Council. Parishes can engage with site promoters at an early stage, which is encouraged, if they wish to discuss this.

13. So what I am hearing is that all these 40 sites are a done deal?

The Regulation 19 version of the VCHAP is the one which the Council wishes to submit to the Secretary of State for Examination, based on the proportionate evidence base and the responses to previous consultations. Therefore, the Council does not envisage significant changes. However, evidence may come forward which suggests the VCHAP would not be sound without further changes. In the event the Council wishes to promote changes, a further Regulation 19 consultation would be required.

14. How long will the plan remain in force?

The Plan period runs to 2038; however, the Government encourages regular review and updating of plans to address changing needs and requirements. It is likely that the Plan will be reviewed within approximately 5 years.

15. Seems apparent that it would be very hard to object to plans in our villages with all the checks you have done.

See 13. above.

16. But it is not 5 times round the block for the sites that have only just appeared on the plan.

17. But why are you not answering our questions about all the changes made to the previous plan without the PCs being consulted in several villages?

18. My earlier point is that the recommended site has not been consulted on

This response relates to questions 16, 17 and 18.

See 4. & 5. above re. adding new sites.

The Plan is an iterative process, with the opportunity to both comment on sites and propose new ones at each of the previous stages. Those new sites that are preferred at this most recent stage are considered to have performed better than ones included in earlier iterations, and changes have often been made in response to comments and evidence submitted at previous stages.

19. We are not getting any of the important questions answered here - complete waste of my time this evening so far.

It was highlighted at the start of the meeting that any questions not answered on the night would receive a written response as part of this note.

20. The last LP suggested 20 houses for Little Melton - we got 110. This plan suggests 35 so should we expect 165?

'Service Villages' in the Norwich Policy Area, as defined in the Joint Core Strategy, were always identified for possible increases above the 10-20 homes set out in JCS Policy 15. The additional homes were permitted due to the lack of 5 Year Housing Land Supply in the area at the time, but are indicative of Little Melton being a popular and sustainable location. The aim of the VCHAP is to allocate appropriate numbers to each village/cluster, and give a degree of certainty; however,

should there be a lack of land supply in the future, this could mean additional sites coming forward in suitable locations.

21. Thurlton were given originally 12 houses. within the last couple of months we learn that another site has been put in the cluster minimum 25 extra houses. What does minimum mean??

All VCHAP allocations are to be for a minimum of 12 homes, with the aim of securing 33% affordable housing. However, site areas have been defined to avoid substantially larger numbers coming forward.

Specifically, regarding the Thurlton sites, VC THU2 (adj. Holly Cottage) was proposed for up to 12 dwellings at Regulation 18, the site has now been combined with the adjoining planning permission for 5 dwellings, for up to 15 dwellings, a small overall reduction in what is proposed. VC THU1 at Blacksmiths Gardens is a new site proposed through the Regulation 18 consultation, the main restriction on which is the access. Therefore, the site is proposed for at least 12 dwellings, however the site is 0.57ha, therefore the potential for significantly more than 12 dwellings (particularly given the need to take into account the bungalow development adjoining the sites) is very limited.

22. This has been very interesting. We were told that the consultation was on the legality and soundness only. The discussion has been about technical issues. Can we raise objections which we have already made under reg 18?

Yes, if you consider that those objections raise an issue of soundness or legal compliance, and you have suggestions on how the Plan needs to be changed to make it sound/legally compliant.

23. Please stop saying you've been round the block five times. It's clear from some of the messages posted that this hasn't been the case in all situations.

See 16. 17. & 18. above.

Questions/Comments raised during the meeting, if not already covered above

24. Did the Council select the sites and then approach the site owners?

No, the Greater Norwich Council's held an initial call for sites at the start of the GNLP process. Subsequent stages of the GNLP allowed for further sites to be submitted. At the start of 2020 a specific call was made for sites that fitted with the aspirations for the VCHAP. Most recently promoters were able to submit sites through the VCHAP Regulation 18 consultation. One of the reasons for approaching it this way is to ensure that the sites have a reasonable prospect of delivery, having been promoted by a landowner/agent/developer with an interest in the site.

25. Why is Bawburgh considered suitable for 35 dwellings, given the level of services in the village, and the village does not seem to be clustered with any others?

Bawburgh has a basic range of services, with a primary school, popular pub, and village hall. The village is also well located for access to the Norfolk and Norwich University Hospital and the

Norwich Research Park, in terms of employment. The village is not clustered with any others, as the primary school catchment only extends to the parish.

26. Will investment in infrastructure, e.g. the NHS, come ahead of new development?

New development is expected to address the impacts of the development itself, this can be through a variety of mechanisms, including highways improvements (including improved pedestrian/cycle links), provision of new open space on sites of 15+ dwellings (or an off-site financial contribution, if that is more appropriate), a proportion of affordable housing and the payment of Community Infrastructure Levy (CIL - paid on the commencement of development, or each phase if the planning permission is phased).

CIL is pooled across Greater Norwich and used to fund priority infrastructure that not directly required by individual developments. This is across four themes, Transport, Community Facilities, Education and Green Infrastructure, but does not currently cover NHS provision. At least 15% of CIL is paid to the local parish council.

In developing both the GNLP and the VCHAP there has been liaison with service providers, such as Norfolk County Council Children's Services and NHS Integrated Care Systems, so that they are aware of the future growth and can prioritise their mainstream budgets accordingly. The Council will continue to explore individual circumstances where it can provide further support to the deliver infrastructure beyond those typical circumstances listed above.

27. The site in Haddiscoe is within 250m of an application for a mineral extraction site. The village also has limited services/facilities.

The proximity of the minerals extraction site, which a proposed allocation in the emerging Minerals and Waste Local Plan (MIN25), has been noted in consultation responses from Norfolk County Council. MIN25 is on the opposite side of the A143/B1136, and Haddiscoe Manor Farm is on the intervening site. There are also existing dwellings on Rectory Road/Rectory Lane which will be as close/closer to MIN25 that VC HAD1. Development on VC HAD1 will be set back from the A143 due to the setting of the Grade I listed church and road noise, which will also help mitigate any impacts from the minerals extraction.

VC HAD1 is adjacent to the village hall and within walking distance of the Haddiscoe Tavern and bus stops on the regular Bungay-Beccles-Gt Yarmouth route. It is recognised that facilities within the cluster are dispersed, but also include Glebeland Primary School, Haddiscoe Station, Aldeby Business Centre as well as at least one other pub and village hall, plus various local employment opportunities. The reasoning behind the clusters approach is (in line with the NPPF) to allow development in one village which may support services and facilities in neighbouring villages too.

28. Where can details about school capacity and flood risk be found?

Whilst the capacity of schools has been discussed with Norfolk County Council Children's Services, we have not published the details as part of the consultation. This is for several reasons, including the fact that figures are a snapshot in time, which don't take into account predicted changes in the number of pupils (based on changes in birth rates and household

composition). Current pupil roles also do not show how many pupils are from out of catchment, although this information is available to Children's Services, or how capacity changes elsewhere (such as the new Primary Schools delivered and proposed at locations such as Trowse, Wymondham, Hethersett etc.) will affect future demand.

In terms of flood risk, Fluvial Zones 2 and 3 are shown on the interactive mapping which is part of the consultation. Where sites have been identified as needing further work, based on a screening of fluvial, surface water and tidal flooding issues, this has been undertaken as part of the Stage 2 Strategic Flood Risk Assessment (SFRA), which can be found in the Supporting Documents (on the webpage or via the virtual village hall). Where the Stage 2 SFRA makes a specific recommendation, this has been taken forward in the main document, usually as a requirement of the allocation Policy

29. What level of detail can people see regarding what is happening on the sites?

At present the VCHAP establishes the principle of development on the proposed allocations. The allocation Policies set several criteria which development of the site should achieve. Some site promoters have submitted indicative layouts as part of their previous responses, often to demonstrate that the site can accommodate the level of development proposed in a reasonable manner; however, these should only be treated as indicative.

Further detail will be available when a planning application is submitted for the sites. The level of detail will depend on the type of application submitted, but ultimately a Full application, or a Reserved Matters application following an initial Outline, will be needed in order to show the detail of the scheme for which permission is being sought. If a planning application is not able to demonstrate that it meets the requirements of the VCHAP Policy, then unless material considerations indicate otherwise, planning permission is likely to be refused.

30. Recent housing developments in villages seem to have a concentration of large, executive homes, out of the reach of local families.

At the time of developing the 2015 Local Plan the Greater Norwich local authorities were seeking affordable housing contributions from sites of 5 or more dwellings. Subsequently central Government set a national threshold for seeking affordable housing contributions only on sites which were classified as 'major' development in the NPPF Glossary (10 or more homes will be provided, or the site has an area of 0.5 hectares or more). This unfortunately meant that some of the smaller allocations made in the 2015 Local Plan were no longer required to deliver any affordable units. Similarly, the Council cannot seek affordable housing on windfall/infill plots that fall below this threshold.

Consequently, the VCHAP is seeking to allocate sites of 12+ units which would deliver both affordable homes and an opportunity for a wider mix of market units.

02 February 2023