

## **STNP Examination – Further question responses from Breckland Council**

The paragraph number applies to those in the document 'Further Comments of the Independent Examiner':

### Key

STNP - Saham Toney Neighbourhood Plan

LP - Local Plan

**Policy 2D- Affordable Housing – Breckland Council to answer**

7. *My question, which is directed to Breckland Council is, in view of the fact that the District Council has not actually allocated sites in Saham Toney, how does it see that Allocation Policy working in a neighbourhood plan area without any local authority allocated sites?  
If it is relying on parish's, meeting, and then exceeding the housing figures allocated in the Breckland Local Plan, does it explicitly need to agree the split of the sites proposed by the Parish Council which is set out in paragraph T2D1, as to what are the sites are to be treated as delivering the extra housing above that required by Breckland Local Plan.*

Currently the STNP splits the sites into those that meet the Breckland LP housing figure and those that exceeding this figure. The Housing 'Allocation policy' is intended to come into effect only when the housing figure in the LP (33 units in Appendix 5) is exceeded. As housing delivery in Saham Toney has now exceeded this housing figure (45 dwellings either completed or with extant planning permission between the adoption of the Plan and Oct 2020) all sites of 10 or more units (STNP 1,4 and 16) will trigger the 'Allocations Policy'. In light of this fact, there is now no longer a need for the Neighbourhood Plan to have a split of sites.

8. *It could be argued that the neighbourhood plan has chosen only to include STNP1 as a site, which is of a size to require affordable housing, within the list of those sites delivering the 33 units, all the other sites chosen in the list are under 10 units. A different combination of sites, say sites STNP4, 8 and 16 could equally deliver the "required 33 units" and that combination would deliver additional affordable housing to meet the district wide need referred to in the Allocation Policy? Is Breckland Council happy with the approach being taken by the Parish Council, which seems to skew the "additional sites" to include the larger sites which will deliver affordable housing with a local connection condition attached.*

Currently, under the Housing 'Allocation policy', STNP 1 would not currently deliver affordable sites with a local connection as it is forms part of the housing allocation figure in the LP for Saham Toney. Only if the housing split was removed, would this apply and, as indicated above, there is now no longer a need for the STNP to have split sites due to the LP housing figure for Saham Toney already being reached.

9. *It appears that the allocation policy was last revised in 2016 which was before the Local Plan was adopted. Was it, at that time, expected that the local plan would be allocating sites rather than leave it entirely to neighbourhood plan, where they are being prepared?*

The 'Allocation policy' that is being referred to is the version (now superseded) that was applied to the Swanton Morley Neighbourhood Plan and was sent (on 8<sup>th</sup> March 2021) as one part of Appendix F to the Swanton Morley's Examiners Report (18th September 2019). The current allocations policy that applies to the STNP, was revised on 16<sup>th</sup> March 2020 and was emailed on 17<sup>th</sup> February 2021.

In the current version of the 'Allocation policy', para 5.17 states that *"a neighbourhood plan that facilitates additional housing supply by allocating sites within their neighbourhood plan for housing over and above those sites already allocated by the local authority to meet the district wide need, Breckland Council will, in relation to any affordable housing secured on those additional named and allocated sites, give preference to applicants with a local connection to the Parish, subject to the requirement to give reasonable preference as detailed in this policy."* This will apply to housing in the STNP, that is additional to the housing figure that has already been allocated in the LP.

Para 5.17 also states that *"Matters of eligibility and priority will be determined in accordance with the full provisions of this allocations policy"*. This will include taking account of the 'exceptions' and the 'exceptional circumstances' included in para 3.4 (Connection to the local area criteria) that has not been taken account of in the STNP Policy 2D, which changed the set of criteria to a hierarchy.

In the adopted LP, Policy HOU 02 only allocates sites for Key Settlements, Market Towns and Local Services Centres (see Local Plan pages 67-160 detailing those villages, identified under Policy HOU 03, where allocations have been made). Those settlements (including Saham Toney) that come under Policy HOU 04 (settlement with boundaries) just have a figure allocated to them (see page 279/80 - Appendix 5 Policy HOU 04 methodology). Those settlements that come under Policy HOU 05 (settlement without boundaries) have no individual figure allocated to them.