

Comments from Strategic Housing Team

Please find comments below on the draft revision of the Yaxham Neighbourhood Plan.

Comments:

Overall – the updated plan feels quite dated, with a lot of references to events from 2015 and around the time of original adoption; it is unclear how much updating has been undertaken on large parts of the plan, with several whole chapters showing negligible changes on the tracked version. In addition, the plan refers to 5yr land supply as being current as of 2023, it is now 2025 and this is not current. It is for others to decide how much of an issue this is in regard to basic conditions, but it feels as though the plan would benefit from a quick update where matters have significantly changed in the meantime. It also does not refer to the latest adopted Housing Allocations Policy 2024 (updated Jan 2025).

HOU1 – whilst the amendments seem minor, they appear to have the effect of requiring any development to meet all of the requirements, rather than any of them as in the previous plan. This would appear to have the effect of making development in the village considerably more difficult; if this is not the intention then it should be explicitly stated how many of these criteria must be met. We would suggest that you reinstate the ‘either’ and ‘or’ or include a note to say “they will not generally be permitted unless it meets one or more of the following criteria:”

Proposed new wording

HOU 01

In principle, new residential development will be permitted on suitable sites within the settlement boundary (see Map 5 – Yaxham and Map 6 – Clint Green).

Proposals for new residential development outside the settlement boundary will generally be permitted where :

- **it is in accordance with the other policies in this Neighbourhood Plan or falls within the categories of development which the NPPF identifies as appropriate for the countryside; Or:**
- **It is a rural exception site for affordable homes; or for market housing It is of an appropriate scale and design to the settlement and does not increase the size of the settlement by significantly more than 5% of its existing dwellings; and It can be clearly shown that the benefits clearly outweigh the adverse impacts, especially those impacts on the strategic gaps, the rural landscape and the open countryside.**

Development within or outside the settlement boundary will not be permitted where it has a significant adverse impact, whether direct or indirect, on the Badley Moor SSSI or the Nar Valley Fens SAC.

HOU7 – strong objection. Affordable housing, unless specifically developed as an exception site, is a provision for the district in line with Breckland Policy HOU07 (particularly pt4), and must be for a Neighbourhood Plan Policy to be in conformity with the adopted Local Plan it must allow allocations in line with the adopted Allocations Policy.

Having consulted with the Housing Manager, it is clear that this policy would not follow the allocations policy. This would lead to a significant disadvantage for others in the district, and result in Breckland being placed at risk not meeting statutory obligations to:

- a. homeless people under the Housing Act 1996
- b. people in reasonable preference bands under the Code of Guidance for Allocations.

Both of these are groups whom the council is required to prioritise.

It should be noticed that where this policy has been agreed in other neighbourhood plans, local prioritisation only applies on **sites proposed in the neighbourhood plan over and above those required to meet the Strategic Housing Need as set out on the adopted Local Plan.**

It is noted that no additional sites are proposed within this Plan, therefore this provision **cannot** be applied here.

We would be happy to work with the Parish Council on seeking to develop an exception site in Yaxham, where lettings can have these restrictions under Breckland Policy HOU14.

However, on the grounds above, we must sustain our objection and ask that this policy is reverted to the previous version or removed from the plan.

The Policy in the previous version is as follows:

HOUSING POLICY HOU7 – AFFORDABLE HOUSING Provision of affordable housing/shared ownership will be encouraged where this is commensurate with the scale and nature of need for such housing locally.

We also suggest you could proposed new suitable sites within this Plan; these would then be over and above requirements, and the proposed Policy could be applied to these sites (and these sites only).

Para 9.9: Fully support the suggested Housing mix and “provision of smaller affordable dwellings with one or two bedrooms” Almost half of households on our current housing register need 1-bed accommodation.