

# **Broadland and South Norfolk Custom and Self-Build Housing SPD**

## **Consultation Statement**

### **1. Introduction**

- 1.1 This Consultation Statement sets out the early engagement and formal public consultation carried out to inform the preparation of the Broadland and South Norfolk Custom and Self-Build Housing Supplementary Planning Document (SPD).
- 1.2 This Consultation Statement has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 to support the adoption of the Custom and Self-Build Housing SPD.
- 1.3 In accordance with the Regulations, this consultation statement sets out:
  - Who was consulted during the preparation of the SPD.
  - How they were consulted.
  - A summary of the main issues raised during the consultation.
  - How those issues have been addressed in the adopted SPD.

### **2. Background**

- 2.1 The purpose of the Custom and Self-Build Housing SPD is to support anyone wishing to submit a planning application for self or custom build, whether that be for a single plot or a larger development of self or custom build properties to sell on. The SPD provides guidance on the implementation and interpretation of policies in the current local plans for Broadland and South Norfolk, in particular Greater Norwich Local Plan (GNLP) policy 5 (Homes) and policy 7.5 (Self-build and custom build windfall housing development outside defined settlement boundaries).

### **3. Early Engagement**

- 3.1 The SPD was prepared by officers in the Place Shaping Team. There was no formal engagement undertaken to prepare the draft SPD, but comments were sought from Development Management colleagues in July and October 2024 which helped to shape the document. In addition, since adoption of the GNLP regular fortnightly meetings have taken place to discuss planning applications submitted under policy 7.5 and these discussions have also been informative.

#### **4. Consultation on SEA/HRA Screening**

- 4.1 As part of the process for developing the Custom and Self-Build Housing SPD, an assessment of the requirement for a Strategic Environmental Assessment (SEA) and HRA was needed. Consultation on an SEA Screening Statement took place between 18 November and 23 November 2024.
- 4.2 The Council notified the following specified bodies of the SEA screening statement by email inviting comments in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004:
- Environment Agency
  - Historic England
  - Natural England
- 4.3 Responses were received from all three of the consulted bodies. A full summary of the responses received for the SEA consultation can be seen in the [SEA determination statement](#).
- 4.4 The responses received confirmed the Council's position that a further SEA was not required as the SPD will not change or introduce new planning policy over and above the Local Plan and, whilst there may be some environmental effects, these have already been covered in principle in the Sustainability Appraisal of the Local Plan.

#### **5. Public consultation on the draft Self-Build SPD**

- 5.1 Public consultation on the draft Custom and Self-Build Housing SPD took place for 6 weeks between 10 February and 21 March 2025. It was originally planned to be a 4-week consultation as specified in both Council's Statements of Community Involvement (SCI's), but members requested 6 weeks, primarily to ensure that Town and Parish Councils had sufficient time to respond. The consultation was available [online](#), although email and postal comments were also accepted.
- 5.2 In compliance with regulations 12, 13 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's SCI's, the following actions were also undertaken:
- The consultees listed in Appendix 1 were contacted by email with details about the consultation and how to respond.
  - Social media posts on Facebook.
  - The document and response forms were available in libraries. Posters were also sent to libraries.
  - Local Members were contacted by email.

## **6. Main Issues raised and the Council's response**

6.1 A total of 67 comments (from 16 respondents) were received to the draft Self-Build SPD consultation.

6.2 Comments were received from the following organisations as well as a small number of individuals:

- Broads Authority
- Cornerstone Planning Ltd
- East Suffolk Council
- George Durrant & Sons Ltd
- Historic England
- Norfolk Homes Ltd
- Reepham Town Council
- Saffron Housing Trust
- Tasburgh Parish Council
- Taverham Parish Council
- Weston Longville Parish Council
- Wheatman Planning Limited

6.3 A full list of the consultation comments received and the Council's responses to these can be found in appendix 2. The table below summarises the main points and council's response to how these issues have been addressed in the final SPD. It does not include minor changes to the text such as clarification, typos or grammatical corrections.

<b>Main Issue</b>	<b>Council response</b>
The criteria state that applicants should have lived in the local area for a specified number of years to be eligible for the self-build register, but there is nowhere in the consultation document which states how long the applicant must live in the house after it is completed.	Under the Self-Build Regulations there is no specified length of time that an individual needs to live in a self or custom build property after it is completed however under the CIL Regulations individuals benefiting from a self-build exemption must occupy the property as their principal residence for a minimum of 3 years after work is completed. The SPD has been updated to reflect this requirement.
There is limited mention of landscape impact in the SPD, particularly impact on the setting of the Broads.	An additional bullet point has been added to paragraph 8.41 to mention landscape and visual effects/impacts, including impact on the setting of the Broads as appropriate.

Main Issue	Council response
The SPD is inconsistent in the advice it gives regarding outline planning applications where the end occupier is not yet known which could cause confusion when a planning application is submitted.	An additional sentence has been added to paragraphs 5.9 and 7.2 to clarify that if an application is submitted in outline and the end occupier is not known then conditions will be applied to the grant of permission and detailed information about the end occupier will need to be presented at reserved matters to that eligibility for Part 1 of the Self-Build register can be checked.
It needs to be made clear that the SPD applies to all designated heritage assets and their setting and not just listed buildings and conservation areas.	The relevant sections of the SPD have been amended to make clear that the historic environment includes all designated heritage assets and their settings.
When producing Design Codes it may be necessary to restrict design freedom in relation to certain design parameters e.g. in relation to the historic environment.	Paragraph 9.5 has been amended to suggest that it may be appropriate to fix design parameters in certain circumstances such as where the site lies within a conservation area or is within the setting of a listed building, scheduled monument or registered park and garden.

- 6.4 All comments on the public consultation have been considered in preparing the final SPD. None of the comments received have required significant changes to the overall approach.

## **Appendix 1 – Consultee List**

### **Statutory Consultees**

1. Coal Authority
2. Environment Agency
3. Historic England
4. Marine Management Organisation
5. Natural England
6. Network Rail Infrastructure Limited
7. Highways Agency
8. Breckland District Council
9. Great Yarmouth Borough Council
10. Norwich City Council
11. The Broads Authority
12. Norfolk County Council
13. Suffolk County Council
14. Norfolk Police Constabulary
15. Suffolk Police Constabulary
16. BT/EE
17. City Fibre
18. Zayo
19. ITS Technology
20. Hyperoptic
21. Vodafone
22. CTIL
23. 3
24. O2 Telefonica
25. BT
26. Mobile Operators Association
27. NHS
28. UK Power Networks
29. National Gas
30. National Grid
31. Avison Young
32. Cadent Gas
33. Fisher German
34. Anglian Water
35. Homes England

## **General Consultees**

1. A Squared Architects
2. Acorous Rural Property Services Ltd
3. Alan Irvine
4. Andrew P R Love Architecture
5. Arcus Consultancy Services Ltd
6. Armstrong Rigg Planning
7. Arnolds Keys
8. Arnolds Keys -Irelands Agricultural
9. Artisan Planning & Property Services
10. Astill Planning Consultants
11. Badger Building
12. Barratt Homes
13. Barton Willmore
14. Bellway Homes Ltd (Eastern Counties)
15. Bennett Homes
16. Bidwells
17. Boyer
18. Broadland Design Architectural Services
19. Broadland Housing Association
20. Brown & Co
21. Brown & Scarlett Ltd
22. Building Partnerships
23. Bullen Developments
24. Bure Valley Properties Ltd
25. Campaign for the Protection of Rural England
26. Carter Jonas
27. Ceras Property
28. Chaplin Farrant Ltd
29. Chapman Chartered Surveyors
30. Chatsworth Homes
31. Cheffins
32. Clayland Architects
33. CODE Development Planners Ltd
34. Cornerstone Planning Ltd
35. Cotman Housing Association
36. Countywide Property Services
37. CPRE Norfolk
38. DAG Architectural Design
39. David A Cutting Building Surveyors Ltd
40. David Futter Associates
41. David Local Associates
42. Day Lewis Planning Ltd
43. Denis Tuttle Architecture Ltd
44. Dennis Black Associates
45. Dennis Jeans Properties

46. Devans Planning
47. DHA Planning
48. DLP Planning Consultants
49. Durrants
50. East Suffolk Council
51. EJW Planning Limited
52. Emery Planning Partnership
53. Equal Lives
54. ESCO Developments
55. Evolution Town Planning
56. Flagship Housing Group
57. FW Properties
58. Gable Developments
59. Gladman Developments Ltd
60. GMP Architecture
61. GP Planning Ltd
62. Graham Norse Planning Consultants Ltd
63. Habinteg Housing Association
64. Hand Consultancy
65. Harvey & Co
66. Hastoe Housing Association
67. Home Builders Federation
68. Hopkins Homes
69. Hudson Architects
70. IE Homes and Property
71. Icení Developments Ltd
72. Icení Projects Ltd
73. Icon Planning and Environmental Ltd
74. Indigo Planning
75. Ingleton Wood LLP
76. James Bailey Planning Ltd
77. John Long Planning
78. John Putman Ltd Architectural Services
79. K Garnham Design
80. Keith Day Architects
81. KFD Architecture
82. Kings Lynn and West Norfolk Borough Council
83. LA Robinson Architectural Services Ltd
84. La Ronde Wright Ltd
85. Landmark Associates
86. Landmark Planning Ltd
87. Lanpro Services Ltd
88. Les Brown Associates
89. Lewis + Tyrrell Architects
90. Linde Homes
91. Lovell Partnerships

92. M Falcon Property Solutions
93. M Scott Properties Ltd
94. Martin Smith Partnership
95. McArthur Tring Architects
96. MDpC Town Planning
97. Merit Thornton Planning and Community Consultancy
98. Mid Suffolk District Council
99. Mike Haslam Associates
100. Mobbs Architects
101. Nathaniel Lichfield & Partners
102. Nexus Planning
103. NJL Consulting
104. Norfolk Homes Ltd
105. Norfolk Land Ltd
106. North Norfolk District Council
107. One Planning
108. Orbit Homes
109. Orbit Living
110. Orwell Housing Association
111. Parker Planning Services Ltd
112. Pegasus Planning Group
113. Persimmon Homes
114. Peter Codling Architects
115. Philip Hendry Builders
116. Pigeon Investment Management Ltd
117. Plainview Planning Ltd
118. Plandescil Ltd
119. PlanInfo
120. PWA Planning
121. Quantum Land
122. Quinn Construction
123. Roberts Molloy Architects
124. Roche Chartered Surveyors
125. Rosconn Strategic Land
126. Rural Solutions
127. Saffron Housing
128. Sally Minns & Associates Ltd
129. Savills
130. Serruys Property Co Ltd
131. Sirius Planning
132. Smallfish
133. SMB Property Consultancy LTD
134. SMG Architects Ltd
135. SSA Planning
136. Strutt & Parker
137. Taylor Wimpey



- 138. Tesni Properties Ltd
- 139. Tetlow King Planning
- 140. The Interesting Building Company
- 141. Tilia Properties
- 142. Turnberry Planning
- 143. USB Design
- 144. Vincent Howes Chartered Surveyors
- 145. Vision Design and Planning
- 146. Walsingham Planning
- 147. Watsons Property
- 148. Waveney District Council
- 149. Wheatman Planning Limited
- 150. Wilde and Wilde Architecture LLP
- 151. Wingfield Planning Consultancy Ltd
- 152. Woods Hardwick Planning Ltd

## **Broadland Town and Parish Councils**

1. Acle Parish Council
2. Attlebridge Parish Meeting
3. Aylsham Town Council
4. Beeston St Andrew Parish Meeting
5. Belaugh Parish Meeting
6. Blickling Parish Council
7. Blofield Parish Council
8. Booton Parish Meeting
9. Brampton Parish Council
10. Brandiston Parish Meeting
11. Brundall Parish Council
12. Burgh & Tuttington Parish Council
13. Buxton with Lamas Parish Council
14. Cantley (Limpenhoe & Southwood) Parish Council
15. Cawston Parish Council
16. Coltishall Parish Council
17. Crostwick Parish Meeting
18. Felthorpe Parish Council
19. Foulsham Parish Council
20. Freethorpe Parish Council
21. Frettenham Parish Council
22. Gt & Lt Plumstead (Thorpe End) Parish Council
23. Guestwick Parish Meeting
24. Hainford Parish Council
25. Halvergate Parish Council
26. Haveringland Parish Meeting
27. Hellesdon Parish Council
28. Hemblington Parish Council
29. Hevingham Parish Council
30. Honingham Parish Council
31. Horsford Parish Council
32. Horsham & Newton St Faiths Parish Council
33. Horstead with Stanninghall Parish Council
34. Lingwood & Burlingham Parish Council
35. Marsham Parish Council
36. Morton on the Hill Parish Meeting
37. Old Catton Parish Council
38. Oulton Parish Council
39. Postwick (Witton) Parish Council
40. Rackheath Parish Council
41. Reedham Parish Council
42. Reepham Parish Council
43. Ringland Parish Council
44. Salhouse Parish Council
45. Salle Parish Meeting

46. South Walsham Parish Council
47. Spixworth Parish Council
48. Sprowston Town Council
49. Stratton Strawless Parish Council
50. Strumpshaw (Buckenham, Hassingham) Parish Council
51. Swanningtonwith Alderford & Little Witchingham Parish Council
52. Taverham Parish Council
53. Themelthorpe Parish Meeting
54. Thorpe St Andrew Town Council
55. Upton with Fishley Parish Council
56. Wood Dalling Parish Council
57. Woodbastwick (Panxworth, Ranworth) Parish Council
58. Wroxham Parish Council

## **South Norfolk Town and Parish Councils**

1. Alburgh Parish Council
2. Aldeby Parish Council
3. Alington with Yelverton Parish Council
4. Ashby St Mary Parish Council
5. Ashwellthorpe & Fundenhall Parish Council
6. Aslacton Parish Council
7. Barford & Wramplingham Parish Council
8. Barnham Broom Parish Council
9. Bawburgh Parish Council
10. Bedingham Parish Meeting
11. Bergh Apton Parish Council
12. Bracon Ash & Hethel Parish Council
13. Bramerton Parish Council
14. Brandon Parva, Coston, Runhall & Welborne Parish Council
15. Bressingham & Fersfield Parish Council
16. Brockdish Parish Council
17. Brooke Parish Council
18. Broome Parish Council
19. Bunwell Parish Council
20. Burgh St Peter & Wheatacre Parish Council
21. Burston & Shimpling Parish Council
22. Caistor St Edmund and Bixley Parish Council
23. Carleton Rode Parish Council
24. Carleton St Peter Parish Meeting
25. Chedgrave Parish Council
26. Claxton Parish Council
27. Colney Parish Meeting
28. Costessey Town Council
29. Cringleford Parish Council
30. Denton Parish Council
31. Deopham & Hackford Parish Council
32. Dickleburgh & Rushall Parish Council
33. Diss Town Council
34. Ditchingham Parish Council
35. Earsham Parish Council
36. East Carleton & Ketteringham Parish Council
37. Easton Parish Council
38. Flordon Parish Council
39. Forncett Parish Council
40. Framingham Earl Parish Council
41. Framingham Pigot Parish Meeting
42. Geldeston Parish Council
43. Gillingham Parish Council
44. Gissing Parish Council
45. Great Melton Parish Council

46. Great Moulton Parish Council
47. Haddiscoe Parish Council
48. Hales & Heckingham Parish Council
49. Hempnall Parish Council
50. Hethersett Parish Council
51. Heywood Parish Meeting
52. Hingham Town Council
53. Holverston Parish Meeting
54. Keswick & Intwood Parish Council
55. Kimberley & Carleton Forehoe Parish Council
56. Kirby Cane & Ellingham Parish Council
57. Kirstead Parish Meeting
58. Langleigh with Hardley Parish Council
59. Little Melton Parish Council
60. Loddon Town Council
61. Long Stratton Town Council
62. Marlingford & Colton Parish Council
63. Morley Parish Council
64. Morningthorpe (and Fritton) Parish Council
65. Mulbarton Parish Council
66. Mundham Parish Council
67. Needham Parish Council
68. Newton Flotman Parish Council
69. Norton Subcourse Parish Council
70. Poringland Parish Council
71. Pulham Market Parish Council
72. Pulham St Mary Parish Council
73. Raveningham Parish Meeting
74. Redenhall with Harleston Town Council
75. Rockland St Mary with Hellington Parish Council
76. Roydon Parish Council
77. Saxlingham Nethergate Parish Council
78. Scole Parish Council
79. Seething Parish Council
80. Shelton & Hardwick Parish Council
81. Shotesham Parish Council
82. Spooner Row Community Council
83. Starston Parish Council
84. Stockton Parish Meeting
85. Stoke Holy Cross Parish Council
86. Surlingham Parish Council
87. Swainsthorpe Parish Council
88. Swardeston Parish Council
89. Tacolneston Parish Council
90. Tasburgh Parish Council
91. Tharston & Hapton Parish Council

92. Thurlton Parish Council
93. Thurton Parish Council
94. Tibenham Parish Council
95. Tivetshall Parish Council
96. Toft Monks Parish Council
97. Topcroft Parish Council
98. Trowse with Newton Parish Council
99. Wacton Parish Council
100. Wicklewood Parish Council
101. Winfarthing Parish Council
102. Woodton Parish Council
103. Wortwell Parish Council
104. Wreningham Parish Council
105. Wymondham Town Council

## Appendix 2 – Consultation comments and Council Response

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
<b>1. What is a Supplementary Planning Document</b>					
Mrs Ruth Goodall	4215	Comment	I support the principle of a planning document to clarify the Local Plan, but I'm afraid the SPD fails to meet its objective	Noted	No change
Clerk to Tasburgh Parish Council	4260	Comment	South Norfolk "Village Clusters Housing Allocations Plan" is still under preparation and not been published	Noted.	No change
<b>2. Introduction</b>					
Clerk to Reepham Town Council	4214	Comment	Further clarification must be provided regarding self build for more than one property. Surely if someone applies for a self build for four properties (for example) this makes them a developer unless they can demonstrate they are keeping the properties for family.	The legislation states that self and custom builders must have substantial input into the design of their property. It is possible for a developer to get outline permission for a number of self or custom build plots to then sell on to self/custom builders who will make a reserved matters application for the layout, design and materials for their own home. It is possible to apply for planning permission in outline for more than one self-build property but details of the end occupier for each property will need to be known at reserved matters stage to ensure self-build eligibility. This is mentioned in paragraph 8.25 of the draft SPD but will be clarified further throughout the document in response to other consultation comments.	See other related changes
Taverham Parish Council	4226	Support	Taverham Parish Council felt that the document required more focus on environmental issues.	Noted but no specific examples given.	No change
Weston Longville Parish Council	4232	Comment	Weston Longville Parish Council does not object to the principal of increasing the number of self build sites within the Broadland and South Norfolk area, as a means of increasing housing stock at more affordable levels (According to the National Custom and Self Build Association (NaCSBA) you could save 40% in costs to build your own home instead of buying one), and maintaining the viability of rural communities which might otherwise only see stagnation.  Submission uses the parish of Weston Longville as an example. Details explain how the parish is made up of 4 sections which then come together to make the whole parish work. Details indicate the types and locations of the facilities within the parish.	Noted	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Mrs Ruth Goodall	4249	Support	I believe that self build has the potential to increase the vitality of villages which are currently excluded from any development and as consequence the demographic is skewed towards the elderly and the retired.	Noted	No change
Alan Presslee Cornerstone Planning	4251	Comment	All the following comments are made on behalf of Norfolk homes Ltd. and are thus all in relation to custom-build (rather than self-build). One of the stated objectives is to improve rates of housing delivery; it seems to us that the additional layers of complexity, and the inevitable delays to the planning application preparation and determination periods, is only likely to extend the process and thus have the opposite impact on the rate at which housing can be delivered. As will the extended timeframes at the contract/purchase stage.	Noted	No change



Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Gillian Purkis	4282	Comment	<p>We wish to raise the following comments regarding the draft consultation. As stated the intention is to 'create diversification, choice and improve rates of housing delivery thus enabling individuals to design the layout of their own home'. I have land registered for self-build with South Norfolk District Council. Plans were submitted in 2021 for a single storey dwelling, the design of which took into consideration the surrounding environment, use of sustainable materials and eco-renewable energy resources applied. The plot of land in question and subsequent single dwelling would have no impact on the neighbouring infrastructure and there is no scope to exceed the number of dwellings to more than one.</p> <p>In July 2021 I received an email from South Norfolk Council stating that they 'would not support the application and I could withdraw or place on hold'. Since this time numerous small/single housing developments in the close surrounding area have gained approval. With this document in consultation the process for an individual such as myself who wishes to build a single dwelling on land previously owned by my parents needs to be simplified. I would strongly suggest a guidance booklet which clearly outlines the whole process to obtaining planning permission for self-build and custom build. Included in the guide contact details of those within Broadland and South Norfolk Council responsible for handling the process, where to seek help relating to for example obtaining technical support, what is permitted and where to obtain guidance on what is acceptable in terms of sustainability, design and legal requirements.</p>	<p>Planning application referred to was submitted in 2021 before adoption of the GNLP in March 2024, therefore there was no policy regarding self-build to assess the proposal against at the time.</p> <p>The SPD is designed to be a guide for anyone wishing to submit a planning application for self or custom build. Rather than provide contact details for officers within the two Council's it links to relevant sections on the website where people can find further information.</p>	No change
<b>3. National Guidance and Legislation</b>					
Mrs Ruth Goodall	4216	Comment	No information seems to be available as to whether Broadland is meeting the demands of those on the self build register, despite the in principle support.	Not necessary to provide this information in the SPD. This information is maintained by Broadland (and South Norfolk) for the purpose of annual government returns and made available more widely on request.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Mr Tom Mitchell	4221	Comment	Error in section 3.3 that may have led to possible significant omission(s) from the document in later sections. Reference was made to the out-of-date NPPF 2023 whereas the latest iteration is NPPF 2024. I believe the omission(s) concerns the updated "Identifying land for homes" Paras 72-77 of NPPF Dec 2024. Reference is made in the draft SPD to NPPF Paragraph 84. Perhaps the 'securing of heritage assets issue' warrants further comment in the draft SPD.	<p>It is recognised that the document should refer to the 2024 NPPF and this will be updated in the final version.</p> <p>With regard to the sections of NPPF paragraphs 73 and 75 highlighted in the original submission these matters were considered through preparation of the GNLP and discussed at the GNLP examination so no changes to the SPD are considered necessary.</p> <p>The respondent suggests that paragraph 8.31 of the SPD (referring to paragraph 84 of the NPPF) should make specific comment on securing heritage assets. This is not considered necessary as the reference to NPPF paragraph 84 in paragraph 8.31 is general in context and does already mention 'unless particular circumstances apply'.</p>	Update NPPF reference in paragraph 3.3
<b>4. What is Self and Custom Build?</b>					
George Durrant & Sons Ltd	4239	Comment	Whilst it is recognised that 4.5 has been lifted from the PPG, for the purposes of the SPD, the meaning of 'off-plan housing' and the 'plan stage' warrants clear definition as they are ambiguous terms. The term 'custom build' as defined in the GNLP, arguably could apply to homes purchased at the 'plan stage', as this allows for a more 'hands-off approach' whereby the occupant instructs a builder to carry out the works on their behalf.	Comments noted. It is agreed that last part of paragraph 4.5 could be re worded to be clearer about off-plan housing.	<p>Reword final sentence of paragraph 4.5 to read:</p> <p>'Off-plan housing, where homes are purchased at the plan stage prior to construction, without full input into the design and final layout from the buyer do not meet the definition of custom and self-build housing and will not be deemed acceptable'.</p>

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Clerk to Tasburgh Parish Council	4261	Comment	4.4 Although the eligibility criteria state that applicants should have lived in the area for 3 out of the last 20 years, nowhere in the consultation does it state how long applicants should live in the house after it is completed. This seems to be a loophole that allow for making a "quick buck". The length of time applicants should live in or retain the property after completion should be increased to avoid profiteering. There should be some liability for CIL to be levied, even at a lower rate.	<p>The Community Infrastructure Levy Regulations make a number of provisions for authorities to grant exemptions from CIL, including for self-build so the Council's do not have any influence over this.</p> <p>Under the Self-Build Regulations there is no specified length of time that an individual needs to live in a self/custom build property after it is completed however under the CIL Regulations individuals benefiting from an exemption for self-build must own the property and occupy it as their principal residence for a minimum of 3 years after work is completed. The SPD will be updated to reflect this</p>	<p>Add an additional sentence to the end of paragraph 10.4 to read:</p> <p>'Individuals benefiting from a CIL exemption for self-build must own the property and occupy it as their principal residence for a minimum of 3 years after work is completed otherwise the CIL charge will be repayable in full'.</p>
Jim Selby, Assistant Planner, East Suffolk Council	4269	Comment	We recommend you consider setting out your expectations in the document around the level of customisation that custom build homes should meet. This will provide a useful benchmark for assessing proposals for custom build homes, particularly those seeking to fulfil GNLP policy 5. Developers may have different expectations to those of the Local Planning Authority as to the level of customisation a custom build home should provide. This SPD is a great opportunity to help address this.	It is considered that the current wording of the SPD is sufficient to explain that in the case of custom build the council will need to be satisfied that the initial owner of the house will have primary input into the final design and layout of the property. The exact detail of what is acceptable can be discussed and negotiated at the planning application stage.	No change
<b>5. Self and Custom Build Housing Registers</b>					
Mrs Ruth Goodall	4217	Comment	I registered for self build several years ago to build on land I own. As far as I'm aware I have paid for two years but not been invoiced for some considerable period of time. I don't know if my registration has lapsed. I'm suggesting that the maintenance and requirement to approve a significant number of application doesn't seem to be something Broadland has taken seriously.	The self-build register is a separate entity from this SPD and we would be pleased to have a separate discussion regarding this matter.	No change
Weston Longville Parish Council	4233	Comment	The Parish Council is supportive of the principal that plots are made available from landowners via the outline planning permission system but then construction is completed by those on the self-builders register.	Noted	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Natalie Beal, Planning Policy Officer, Broads Authority	4236	Comment	<p>5.5 third bullet point, formatting and position of brackets</p> <p>There is not much mention of landscape impact of proposals, especially when adjacent to a settlement. Linked to this, a mention of impact on the setting of the Broads would be welcomed. It should be noted that the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A which creates a general duty of public bodies, and this was amended to replace 'shall have regard to' with 'must seek to further' as follows:</p> <p>(1) In exercising or performing any functions in relation to, or so as to affect, land in the Broads, a relevant authority <del>shall have regard to</del> <u>must seek to further</u> the purposes of –</p> <p>(a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;</p> <p>(b) promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and</p> <p>(c) protecting the interests of navigation.</p> <p>This website defines public bodies - it seems National Highways would fit the explanation: Public bodies - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p> <p>The special qualities are listed here: The Local Plan for the Broads Review: Preferred options consultation (<a href="http://broads-authority.gov.uk">broads-authority.gov.uk</a>) at page 26, section 7.14</p>	<p>Noted. Agree to update the third bullet point of paragraph 5.5 to correct formatting and position of brackets.</p> <p>The comment regarding landscape impact of proposals on the setting of the Broads is also noted. It is agreed to include mention of the Broads in the bullet point list at paragraph 8.41.</p>	<p>Reword the third bullet point of paragraph 5.5 to read:</p> <p>'Be seeking (either alone or with others) to acquire a serviced plot of land for their own self-build and custom housebuilding project'.</p> <p>Amend the fourth bullet point of paragraph 8.41 to read: 'Landscape and visual effects/impacts, including impact on the setting of the Broads as appropriate'.</p>

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
George Durrant & Sons Ltd	4240	Comment	<p>5.9 - There is an inconsistency here that will cause problems at the application determination stage and requires attention. 8.25 rightly states that in the case of outline applications, conditions will be applied to the permission, and the eligibility test will be used at reserved matters stage, which is sensible. 5.9 suggests otherwise. The document needs to be amended to make this clearer, or outline applications will be wrongfully refused when landowners, developers etc apply for outline planning permission for self and custom build schemes.</p> <p>Suggested wording: 'In the case of a full or reserved matters application, for a scheme to be acceptable, applicants will need to demonstrate that they fulfil the criteria in paragraph 5.7 above even if they have not formally joined the register. For outline applications, no such test will be required, but conditions will be applied to the planning permission to ensure that the plots can only be developed by self or custom builders, with the test applied at the reserved matters'.</p> <p>'authorities' should be amended to 'authority's'.</p>	<p>Noted. It is agreed that paragraph 5.9 could be clearer in terms of outline applications under Policy 7.5. The suggested wording is useful and has been considered in the proposed rewording of the paragraph.</p> <p>Agree to amend 'authorities' to 'authority's' as suggested</p>	<p>Add additional sentence after the first sentence of paragraph 5.9 to read:</p> <p>'If an application is initially submitted in outline and the end occupier is not known then conditions will be applied to the grant of outline permission and detailed information about the end occupier will need to be presented at the reserved matters stage so that eligibility for Part 1 of the register can be checked'.</p> <p>Amend first sentence of paragraph 5.9 to read: 'authority's register' rather than 'authorities' register'</p>
Norfolk Homes Ltd	4252	Comment	<p>From our perspective, registration is ineffective in that it is insufficiently specific regarding location, house type, or timeframe. And thus, giving insufficient clarity to the house builder in preparing for and submitting an application.</p> <p>It is not clear how effectively the register demonstrates demand for custom-build houses and thus enable developers to plan. Especially as there is no continuity between the register and application.</p> <p>How easy will it be to effectively demonstrate no demand, and in a reasonable timeframe?</p>	<p>Both Broadland and South Norfolk Councils maintain self-build registers in line with Government requirements and the duty to grant permission for enough suitable serviced plots to meet demand. Monitoring is undertaken annually using a 31 October to 30 October base period. There is no duty to collect detailed information about location, house type or timeframe although both Councils do ask optional questions regarding this during the application process for their registers.</p>	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Simon Wheatman, Wheatman Planning Ltd	4280	Comment	<p>The advice in para 5.9 is not consistent with that in para 8.25 in respect of applications for outline consents and the eligibility criteria. Para 8.25 correctly states that where an application for outline planning permission is made, conditions in respect of eligibility will be applied to the permission, and the eligibility test in respect of the criteria used for Part 1 of the Register must be met at reserved matters stage.</p> <p>This could avoid potential situations where outline applications submitted by landowners or promoters of a scheme are refused purely on this issue.</p> <p>The wording of para 5.9 should be amended along the lines of "If an application is initially submitted in outline and the end occupier is not known then conditions will be applied to the grant of outline permission and detailed information about the end occupier will need to be presented at the reserved matters stage so that eligibility for Part 1 of the register can be checked."</p>	Comment noted. It is agreed that paragraph 5.9 could be clearer in terms of outline applications under Policy 7.5. The suggested wording is useful and has been considered in the proposed rewording of the paragraph.	<p>Add additional sentence after the first sentence of paragraph 5.9 to read:</p> <p>'If an application is initially submitted in outline and the end occupier is not known then conditions will be applied to the grant of outline permission and detailed information about the end occupier will need to be presented at the reserved matters stage so that eligibility for Part 1 of the register can be checked'.</p>
<b>6. Finding a self-build plot</b>					
George Durrant & Sons Ltd	4241	Comment	6.2 - This is an excellent resource that should be made publicly available at all times in an anonymised form. Contact details should also be provided within the SPD to make it easier for stakeholders to access the register.	Work is currently underway to improve the level of information about the self-build register that is publicly available online. Section 5 of the SPD contains a link to the relevant webpage.	No change
Norfolk Homes Ltd	4253	Comment	<p>It should be noted that even the title of this heading mentions only self-build and not custom-build plots. And throughout this section there is reference to self-build rather than custom and self-build.</p> <p>For larger scale developments, it is practically very difficult to identify specific plots at an early enough stage, as promoted by the SPD. The process seems best able to facilitate smaller, windfall rural sites, or specific/identified sites, rather than larger allocations or windfall sites. But of course, the threshold is 40 dwellings (under Policy 5 of the GNLP).</p>	Noted. It is agreed to amend the title and relevant wording throughout Section 6 to refer to custom build as well as self-build.	<p>Amend title of Section 6 to read:</p> <p>'Finding a custom or self-build plot'</p> <p>Amend wording throughout section 6 to refer to custom build.</p>

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
<b>7. Submitting a planning application for custom or self-build</b>					
George Durrant & Sons Ltd	4242	Comment	<p>7.1 - Whilst we would agree that early engagement with the Council is preferable, the pre-application service is extremely slow, and became so congested in 2024 that it had to be suspended for several months. It is therefore unrealistic to expect applicants for small schemes to engage in the pre-app service, as it is uneconomical and not a good use of the Council's resources. Arguably, the SPD, if worded correctly, should reduce the need for pre-application advice in any case.</p> <p>7.2 - There is an inconsistency here that will cause problems at the application determination stage and requires attention. 8.25 rightly states that in the case of outline applications, conditions will be applied to the permission, and the eligibility test will be used at reserved matters stage, which is sensible. 7.2 suggests otherwise. The document needs to be amended to make this clearer, or outline applications will be wrongfully refused when landowners, developers etc apply for outline planning permission for self and custom build schemes.</p> <p>Suggested wording: 'In the case of a full or reserved matters application, for a scheme to be acceptable, applicants will need to demonstrate that they fulfil the criteria in paragraph 5.7 above even if they have not formally joined the register. For outline applications, no such test will be required, but conditions will be applied to the planning permission to ensure that the plots can only be developed by self or custom builders, with the test applied at the reserved matters stage'.</p>	<p>Noted. The pre-application advice service is now up and running again and is the best way for applicants to get advice prior to submitting a planning application. As suggested the SPD should help reduce the need for pre-application advice.</p> <p>Noted. It is agreed that paragraph 7.2 could be clearer in terms of outline applications under Policy 7.5. The suggested wording is useful and has been considered in the proposed rewording of the paragraph.</p>	<p>No change.</p> <p>Add an additional sentence before the final sentence of paragraph 7.2 to read:</p> <p>'If an application is initially submitted in outline and the end occupier is not known then conditions will be applied to the grant of outline permission and detailed information about the end occupier will need to be presented at the reserved matters stage so that eligibility for Part 1 of the register can be checked'.</p>

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Norfolk Homes Ltd	4254	Comment	<p>A series of questions raised in relation to the approach:</p> <ul style="list-style-type: none"> <li>Where there are plots (of a potentially unknown size/design), not knowing what will be nearby/neighbouring will have an adverse effect on the demand for, and sales of, nearby houses.</li> <li>Additional planning costs will need to be passed onto a purchaser of a custom-build plot.</li> <li>Is it necessary for every full application to be a hybrid application, if the design of some (custom build) plots are to be 'reserved'? What timescales for Reserved Matters submission/s are to be applied for a number/series of reserved custom build plots within such a scheme?</li> <li>The process (flexible yet imprecise) will inevitably constrain the ability for house buyers to borrow (mortgages), and exchange contracts.</li> <li>What are the implications for subsequent NMAs or S.73s, specific to individual custom build plots on a larger scheme?</li> <li>How does this dovetail with the Building Regulations process?</li> <li>Against whom would any enforcement/non-compliance with condition action be made (housebuilder or custom builder)?</li> </ul>	The questions raised are noted but it is felt that some of them such as the adverse effect of self-build plots on the sale of nearby houses, potential additional planning costs and the impact on the house purchases are outside the scope of this SPD. With regard to the question about planning applications, it will be important to seek early advice about the best way to submit an application, particularly with regard to custom or self-build plots on larger sites under GNLP Policy 5.	No change
Clerk for Tasburgh Parish Council	4262	Comment	Where outline permission has been granted, consideration should be given to any subsequent changes in design to ensure that properties sit in proportion to the size of the plot. Where applicable consideration should be made to comply with Design Codes where a Neighbourhood Plan is in place.	If outline permission is granted for a self or custom build dwelling then full consideration will be given to the design, layout and siting at the reserved matters stage taking into account Design Codes in Neighbourhood Plans if relevant.	No change.
Jim Selby, Assistant Planner, East Suffolk Council	4270	Comment	7.2 - In addition to including a reference to custom or self-build in the description, it may be useful to highlight any additional sections of the planning application, or requirements for additional information, applicants might be required to provide. The example standard conditions and legal agreements should be included in the SPD as an appendix.	Consideration was given to including example conditions and legal agreements as appendices to the SPD, but it was thought better to provide these on request so that applicants are receiving the most up to date information at any given time.	No change
<b>Impact of nutrient neutrality</b>					
Mrs Ruth Goodall	4247	Support	Whilst supporting the objective of nutrient neutrality it is also important to have in place proportionate measures which reflect the difference between a developer led housing estate and a single home.	Nutrient neutrality applies to all new development comprising overnight accommodation within the catchment of protected habitats regardless of whether it is a single home or a housing estate. This is beyond the scope of this SPD.	No change



Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Jim Selby, Assistant Planner, East Suffolk Council	4271	Comment	7.3 - The link for more information on nutrient neutrality goes to the general 'Planning application advice' section. It may be more useful for the link to go directly to the 'Nutrient neutrality' section.	Noted.	Update link directly to nutrient neutrality section
Other Guidance					
Jim Selby, Assistant Planner, East Suffolk Council	4272	Comment	7.4 - The link for more information on other considerations goes to the general 'Planning application advice' section. It may be more useful for the link to go directly to sections specifically relating to BNG and GIRAMS.	Noted	Update link directly to BNG and GIRAMS sections
			7.6 - More clarity on how BNG exempt planning applications need to be clear as to how they meet the definition of custom and self-build may be of use to potential applicants.	Noted but it is felt that paragraph 7.5 provides links to this information.	No change
8. Policy Context					
Mrs Ruth Goodall	4248	Comment	The target of 800 self and custom build houses over a 20 year period is modest. The proposed criteria, given the numbers of houses allowed per parish and the number of settlement and non settlement parishes, will mean the target will not be met. There will be a shortfall of 240/245 and the proposed definitions are likely to lead to more rather than fewer appeals. 7.5 was a good policy and could be again with the addition of a 'housing in clusters' policy, and more discretion given to officers to treat applications on their individual merit.	It is not possible to change the wording of polices with the Greater Norwich Local Plan or add new policy as the GNLP has been adopted following examination in public by an independent government inspector	No change
Greater Norwich Local Plan					
Mrs Ruth Goodall	4218	Comment	I fully support the aspiration in the GNLP but the criteria will make it in achievable.	Noted	No change
Policies directly applicable to custom and self-build					
West Longville Parish Council	4230	Comment	The Parish Council is supportive of the principal that plots are made available from landowners via the outline planning permission system but then construction is completed by those on the self-builders register.	Noted	No change
Mrs Ruth Goodall	4250	Object	Sites provided as part of larger residential developments will mean that the opportunities for individual self build projects will be more limited and likely to be squeezed out by developers. This will create the illusion that a policy is being implemented when the facts on the ground are different.	At least 5% of plots on sites of 40 or more dwellings will need to be provided as self/custom build to meet the requirements of GNLP Policy 5 and these will be secured through a legal agreement/condition.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Clerk to Tasburgh Parish Council	4263	Comment	Sites in areas where a Neighbourhood Plan is present should only be permitted within settlement boundaries and should avoid environmentally sensitive areas.	Although Neighbourhood Plans form part of the statutory development plan for the area and must be taken into account in decision making, Policy 7.5 is a strategic policy in the GNLP that allows for small scale residential development outside defined settlement boundaries and as such a Neighbourhood Plan cannot take precedence.	No change
<b>Sites within settlement limits</b>					
Jim Selby, Assistant Planner, East Suffolk Council	4273	Comment	8.10 - for a more consistent 'flow' within the document, later paragraphs specifically referred to in another paragraph should ideally follow the paragraph referencing them.	No change is suggested to the order of the document in response to this comment, but it is noted that the paragraph numbers referred to in paragraph 8.10 are incorrect.	Correct paragraph numbers referred to in 8.10 to read 8.48 and 8.49 instead of 8.44 and 8.45.
<b>Sites provided on larger residential developments through GNLP Policy 5</b>					
Norfolk Homes Ltd	4255	Comment	<p>A series of questions raised in relation to the approach:</p> <ul style="list-style-type: none"> <li>• Where there are plots (of a potentially unknown size/design), not knowing what will be nearby/neighbouring will have an adverse effect on the demand for, and sales of, nearby houses.</li> <li>• Additional planning costs will need to be passed onto a purchaser of a custom-build plot.</li> <li>• Is it necessary for every full application to be a hybrid application, if the design of some (custom build) plots are to be 'reserved'? What timescales for Reserved Matters submission/s are to be applied for a number/series of reserved custom build plots within such a scheme?</li> <li>• The process (flexible yet imprecise) will inevitably constrain the ability for house buyers to borrow (mortgages), and exchange contracts.</li> <li>• What are the implications for subsequent NMAs or S.73s, specific to individual custom build plots on a larger scheme?</li> <li>• How does this dovetail with the Building Regulations process?</li> <li>• Against whom would any enforcement/non-compliance with condition action be made (housebuilder or custom builder)?</li> </ul>	The questions raised are noted but it is felt that some of them such as the adverse effect of self-build plots on the sale of nearby houses, potential additional planning costs and the impact on the house purchases are outside the scope of this SPD. With regard to the question about planning applications, it will be important to seek early advice about the best way to submit an application, particularly with regard to custom or self-build plots on larger sites under GNLP Policy 5.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
<b>Exceptions sites in the countryside through GNLP Policy 7.5</b>					
Mrs Ruth Goodall	4219	Comment	The original 7.5 policy was breakthrough in planning terms in allowing for a small amount of growth within rural areas. The example from the Deputy Planning Officer at a GNLP seminar in November 2019 was of 'A widow wishing to downsize and stay in the community'. It has subsequently been chiselled away, to the point where its scarcely an innovation at all. Suffolk shows the way with its Housing in Clusters Policy, which maintains the spirit of 7.5 with clear criteria. Broadland can still choose to do something different rather than tying itself in knots with an unworkable policy.	It is not possible to change the wording of policies with the Greater Norwich Local Plan or add new policy as the GNLP has been adopted following examination in public by an independent government inspector. The original wording of Policy 7.5 was not considered to be sound by the inspector.	No change
Weston Longville Parish Council	4231	Comment	<p>Whilst it is appreciated that the policy seeks to prevent greenfield development by placing an emphasis on keeping building within the existing built area, and given that the amount of development is limited to a maximum of 3 plots per parish until 2038, then consideration should be given to the built areas with a whole parish and not just to tiny area within a large parish.</p> <p>The Parish Council is supportive of the principal that the self-builders are constrained to live in the property for a set number of years - we would suggest a minimum of 5, but there should be caveats which protect the builders from exceptional changes in their circumstances such as bankruptcy, family breakdown etc.</p>	<p>There is no limit on a maximum of 3 plots per parish until 2038, this comment may relate to a misinterpretation of the current policy wording or wording in the submission version of GNLP Policy 7.5 which was not supported by the Inspector through the examination process.</p> <p>Under the Self-Build Regulations there is no specified length of time that an individual needs to live in a self/custom build property after it is completed however under the CIL Regulations individuals benefiting from an exemption for self-build must own the property and occupy it as their principal residence for a minimum of 3 years after work is completed. As this is written into Regulations we have no control over the time period or circumstances of this requirement.</p>	<p>No change</p> <p>No change</p>
Weston Longville Parish Council	4234	Comment	Whilst it is appreciated that the policy seeks to prevent greenfield development by placing an emphasis on keeping building within the existing built area, and given that the amount of development is limited to a maximum of 3 plots per parish until 2038, then consideration should be given to the built areas with a whole parish and not just to tiny area within a large parish.	There is no limit on a maximum of 3 plots per parish until 2038, this comment may relate to a misinterpretation of the current policy wording or wording in the submission version of GNLP Policy 7.5 which was not supported by the Inspector through the examination process.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
George Durrant & Sons Ltd	4243	Comment	8.24 - It is agreed that this is necessary, though as per our previous comments, we would stress that the condition in this case applies to the occupant, not the applicant. The use of conditions and S106 agreements guarantees that the occupant will be a self-builder, reducing the need for concern over whom the applicant is, certainly in the case of outline applications.	Noted	No change
Clerk to Tasburgh Parish Council	4264	Comment	Section 8.19, 8.20 Policy 7.5 allowing land adjacent to the development boundary - this could allow several plots to come forward, all "adjacent" to different parts of the settlement, hence the settlement could grow significantly. Policy should state that if one site has been allowed others will not.	Noted but there is no limit on the number of plots that can come forward in a settlement under Policy 7.5 other than the need for development to respect form and character and not exceed levels of growth contrary to the Sustainable Growth Strategy outlined in GNLP Policy 1 when considered cumulatively.	No change
Simon Wheatman, Wheatman Planning Limited	4281	Comment	The use of conditions and s106 agreements is understandable, and within the context of the comments of appeal Inspectors, wholly appropriate to meet the objectives of the GNLP Policy 7.5. However, as the SPD is intended to "expand upon policy and provide further detail to support the implementation of policies in the local plan" (para 1.1) it is considered that examples of the stipulations should be provided in an appendix, with an overview provided within the body text of the DPD. This would be particularly helpful to custom/self builders researching the situation, without recourse to the LPA.	Consideration was given to including example conditions and legal agreements as appendices to the SPD but it was thought better to provide these on request so that applicants are receiving the most up to date information at any given time.	No change
			As mentioned in our comments in relation to para 5.9, the wording of the condition should apply to the end occupant, not the applicant. The use of conditions and S106 agreements ensure the end occupant of a property will meet the occupancy criteria for a custom or self-build home. This is particularly necessary in the case of applications for outline planning permission, where the applicant may not be the end occupant(s), and/or where more than one plot may be proposed.	The wording of conditions will apply to the end occupier and not the applicant.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
<b>Do I need to be on the self-build register to apply for development under Policy 7.5</b>					
George Durrant & Sons Ltd	4244	Comment	<p>There is an inconsistency here that will cause problems at the application determination stage and requires attention. 8.25 rightly states that in the case of outline applications, conditions will be applied to the permission, and the eligibility test will be used at reserved matters stage, which is sensible. 7.2 and 5.9 suggest otherwise. The document needs to be amended to make this clearer, or outline applications will be wrongfully refused when landowners, developers etc apply for outline planning permission for self and custom build schemes.</p> <p>Suggested wording: 'In the case of a full or reserved matters application, for a scheme to be acceptable, applicants will need to demonstrate that they fulfil the criteria in paragraph 5.7 above even if they have not formally joined the register. For outline applications, no such test will be required, but conditions will be applied to the planning permission to ensure that the plots can only be developed by self or custom builders, with the test applied at the reserved matters stage'.</p>	Noted and addressed in earlier comments above.	No change
Jim Selby, Assistant Planner, East Suffolk Council	4274	Comment	8.25 - As per previous comment, clarifying the eligibility criteria within the paragraph may aid the reader, rather than referencing an earlier section.	Noted but it is not felt necessary to repeat the eligibility criteria when they are already specified in paragraph 5.7.	No change
<b>Is my site in a suitable location?</b>					
Mrs Ruth Goodall	4220	Comment	Broadland needs to acknowledge that its definitions of settlements with a boundary and settlements without a boundary are no longer fit for purpose. The situation on the ground has changed in terms of infrastructure and facilities, and definitions and policies need to change too if Broadland wishes to avoid allowing some villages to thrive and others to become moribund. The SPD acknowledges that defining a settlement is difficult and sustaining a vital community is not just about facilities its also about the commitment of individuals to their community. 7.5 requires a more detailed understanding of context by officers.	Noted. One of the purposes of the SPD was to try and define what is meant by a settlement with or without a settlement boundary within the context of adopted GNLP policy and national guidance.	No change

Weston Longville Parish Council	4235	Comment	<p>The criteria for assessing whether a group of houses is a settlement are far too subjective. The outcome is based on the individual perceptions or interpretations and experiences of the officer, which can vary from person to person. Officers will require a far more in depth knowledge of the local area than is usually required to determine an application. There is no indication as to how an officer will be able to establish either how vital a community is, nor how it maintains that vitality.</p> <p>In small, rural communities, it is impossible for any one area to thrive and be vital without the support of the other local areas - the pub and village hall may be located in one place but they cannot be sustained without the support of those living outside the immediate proximity. Using Weston Longville as an example, the Parish Council is made up of one councillor who lives within the village, and then two from the Morton Lane grouping, two from Rectory Rd and two from Weston Green - the spread of which means that a whole parish view on decisions can better be taken, as is required under the National Association of Local Councils Good Councillors Guide. The legal framework of the Parish Council's recognises that a community is greater than just a small area of adjacent houses. The village hall is already a combined enterprise from 3 communities - Weston Longville, Morton on the Hill and Attlebridge. Of the 12 trustees, 6 come from Weston Longville but those 6 are split into 1 from the village centre, 1 from Morton Lane, 1 from Rectory Rd and 3 from Weston Green. This again shows that it takes a large scale community to make such enterprises function, and it is not possible to focus 'the vitality of rural communities' into a very narrow area.</p> <p>In rural Norfolk, with its poor infrastructure of roads and public rights of way, and lack of public transport, accessing any form of services without a car is almost impossible. This means that a great many villages in the village cluster model will have no reasonable safe access to any facilities or services. Simple table top examinations will not give a true reflection of the volumes of traffic and road safety on the ground, and the extent to which people can walk / cycle to places is extremely variable. This again means a high level of subjectivity is required by the officers making the determination.</p>	<p>It is difficult to be too rigid in the application of criteria relating to the definition of a settlement without creating new policy requirements which is outside the scope of this SPD. The assessment of what constitutes a settlement will be subjective as recognised in the SPD and there are cases where officer judgement will be required within the parameters set out in the SPD.</p>	No change
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Mr Warren Farrow	4238	Object	<p>The SPD's definition of what constitutes a 'suitable' settlement to accommodate self-build proposals is far too restrictive, particularly the need for a 'suitable' settlement to demonstrate a proportionate level of safe accessibility to commonly used day-to-day services and facilities, either in the settlement in question or within a reasonable safe distance in a nearby settlement; and proposals which have no reasonable safe access to services and facilities are unlikely to be considered acceptable under this part of the policy (with the intimation that 'safe access' means by walking or cycling or the use of public transport only). This approach is more restrictive than the GNLP Policy 7.5 indicates. The Policy allows flexibility to be applied to the consideration of access to services and facilities. It does not require self-build proposals to be within safe walking or cycling distance of a range of services and facilities, which is what the Draft SPD appears to require. The same restriction does not apply to housing schemes within settlements in the Development Plan that have a defined Settlement Boundary but not the full range of services and facilities to meet the day to day needs of residents. A reasonably large number of settlements in Broadland and South Norfolk have defined Settlement Boundaries, but do not exhibit the full range of services and facilities that meet the day to day needs of residents, some settlements with Settlement Boundaries have very limited services and facilities leaving residents no option to access services and facilities other than the private motor car, yet residential proposals within a boundary of such settlements can be considered supportable by Development Plan Policies. However, according to the Draft SPD the same acknowledgement does not apply to self build proposals. It does not appear fair for a self build proposal outside of a Settlement Boundary but next to a settlement without a Settlement Boundary to be deemed unacceptable just because the residents cannot access day to day services by walking and cycling only, when residential development within a Settlement Boundary where access to day to day services can only be through the use of a private motor car can be supported. It is not reasonable to assume that a 'suitable' settlement without a defined settlement boundary under Policy 7.5 should be able to demonstrate a proportionate level of safe accessibility to commonly used day-to-day services and facilities, either in the settlement in question or within a reasonable safe distance in a nearby settlement, if that</p>	<p>Do not agree that the SPDs definition of a suitable settlement is too restrictive. It is felt that the reference to a 'proportionate level of safe accessibility etc....' is a reasonable interpretation of the Policy 7.5 supporting text in relation to Policy 2. The SPD does not refer solely to walking or cycling, it simply refers to safe accessibility, in line with Policy 2. The reliance on the private car in parts of Broadland and South Norfolk to access services and facilities is recognised but planning should be encouraging the use of sustainable modes of transport where possible.</p>	No change
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Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
			assumption is that safe access means by walking and cycling only. Safe access to services and facilities can be achieved by the use of the private motor car. The SPD should acknowledge that in a rural area like Broadland and South Norfolk, there are settlements without Settlement Boundaries that residents will only be able to access services and facilities by the private motor car, and seek to not automatically rule out self-build proposals adjacent to such settlements simply because the new occupants of a self build property would need to use the private motor car. Without this acknowledgement and acceptance that 'safe access' can include the use of the private motor car, there will be very limited opportunities for self-build proposals in the rural parts of Broadland and South Norfolk that could be considered acceptable.		
George Durrant & Sons Ltd	4245	Object	8.32 - We would contend that it is unnecessary to resort to the use of irrelevant dictionary definitions of words which feature in the NPPF in order to prevent rural development. The definition cited here does not naturally lead to a conclusion that a purely residential area lacks vitality by definition. It is a noun that usually applies to living beings, not places, and more appropriate definitions in the context of places range from 'the property of being able to survive and grow'; 'the capacity to live, grow or develop' or 'the power to endure or survive'. Many purely residential areas are abundant in vitality, particularly if there is a common green space or front gardens which allow residents to meet one another. 7.5 is worded in a way to allow the development of self-build plots in areas outside of settlement boundaries. Most rural settlements with services (i.e. school, church, shop, pub) have a settlement boundary, so applying 8.32 as currently worded would undermine that element of the policy. 8.32 should be removed as it does not add any helpful interpretation of 7.5.	Agree that the dictionary definition of vitality is probably not necessary but do not agree that the whole paragraph should be removed as it is felt that paragraph 83 from the NPPF is important in defining what constitutes a settlement in rural areas.	Remove the dictionary definition of vitality but retain the remainder of paragraph 8.32
George Durrant & Sons Ltd	4246	Comment	'Less good accessibility' should be amended to 'poorer accessibility'	Agreed	Amend the wording in paragraph 8.35 from 'less good accessibility' to 'poorer accessibility' as suggested.



Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
<b>Other considerations under Policy 7.5</b>					
David Grech, Planning Policy Officer, Historic England	4222	Object	Paragraphs 8.39 -8.41 We welcome the various references to the historic environment and form and character of the settlement throughout the SPD, particularly paragraphs 8.39 - 8.41, which we support. Notwithstanding this we recommend that paragraph 8.41, bullet point 5, should be expanded to clarify that the same considerations would apply to all designated heritage assets and their settings (e.g. scheduled monuments and registered parks and gardens), and not just listed buildings and conservation areas.	Agree that the fifth bullet point of paragraph 8.41 could be expanded to apply to all designated heritage assets and their settings and not just listed buildings and conservation areas.	Amend the fifth bullet point of paragraph 8.41 to read:  'Historic environment e.g. proximity of and impact on all designated heritage assets and their settings and the potential need for a heritage statement'
Natalie Beal, Planning Policy Officer, Broads Authority	4237	Comment	<p>5.5 third bullet point, formatting and position of brackets</p> <p>There is not much mention of landscape impact of proposals, especially when adjacent to a settlement. Linked to this, a mention of impact on the setting of the Broads would be welcomed. It should be noted that the Levelling Up and Regeneration Act, which received Royal Assent on 26 October 2023, amended Section 17A of the Norfolk and Suffolk Broads Act 1988. Section 17A which creates a general duty of public bodies, and this was amended to replace 'shall have regard to' with 'must seek to further' as follows:</p> <p>(1) In exercising or performing any functions in relation to, or so as to affect, land in the Broads, a relevant authority <del>shall have regard to</del> <u>must seek to further</u> the purposes of –</p> <p>(a) conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;</p> <p>(b) promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and</p> <p>(c) protecting the interests of navigation.</p> <p>This website defines public bodies - it seems National Highways would fit the explanation: Public bodies - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</p> <p>The special qualities are listed here: The Local Plan for the Broads Review: Preferred options consultation (<a href="http://broads-authority.gov.uk">broads-authority.gov.uk</a>) at page 26, section 7.14</p>	Comments noted, dealt with above	See change above

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Jim Selby, Assistant Planner, East Suffolk Council	4275	Comment	8.46 - First sentence could be split/punctuated to make it easier to read. Missing full stop at the end of the paragraph.	Agree	Update the first sentence of paragraph 8.46 to read:  'Policy 7.5 is intended to support limited new development in the countryside, therefore the consideration of the cumulative impact....'  Add full stop to the end of the paragraph.
<b>Other Local Plan Policies</b>					
David Grech, Planning Policy Officer, Historic England	4223	Object	Paragraph 8.48 We recommend adding reference to Broadland's historic environment policy to this list. This is for completeness and consistency with the list for South Norfolk.	No reference to a historic environment policy found in the Broadland Development Management DPD so unclear as to what needs adding.	No change
Norfolk Homes Ltd	4256	Comment	There are other policy implications that rely on the approval of a specific floor area of a dwelling or dwellings: what will happen in relation to policies for public open space provision, for example?	All relevant Local Plan policies such as open space provision will continue to apply where appropriate.	No change
<b>Neighbourhood Planning</b>					
Clerk for Tasburgh Parish Council	4265	Comment	Policies within Neighbourhood Plans should always be taken into account and take precedence.	Neighbourhood Plans form part of the statutory development plan for the area and must be taken into account in decision making, however Policy 7.5 is a strategic policy in the GNLP that allows for small scale residential development outside defined settlement boundaries and as such although a Neighbourhood Plan will be taken into account it cannot take precedence.	No change
<b>9. Design Codes and Plot Passports</b>					
Norfolk Homes Ltd	4257	Comment	In general, the concept of plot passports is an extra burden that constrains/slows the delivery of housing. Unless they can indicate standard house types with inherent flexibility (for the purposes of an application/permission).	It is recognised that plot passports are not always necessary or helpful depending upon the circumstances of the development which is why they are recommended and not mandatory in the SPD	No change
Clerk for Tasburgh Parish Council	4266	Comment	Where Design Codes are in place they must be adhered to.	Design freedom is an important aspect of self and custom build but wider advice on design such as design code work undertaken for neighbourhood plans should be taken into account. If there are clear reasons for fixing design parameters, then this should be set out in a design code for the development to be discussed and agreed at the planning application stage.	No change

Respondent	Rep ID	Support/ Object/ Comment	Consultation Comments	Council response	Change to SPD
Jim Selby, Assistant Planner, East Suffolk Council	4276	Comment	It may be of use to users of the SPD if an example plot passport could be included as an appendix.	The inclusion of an example plot passport as an appendix to the SPD was considered at an early stage, but it was decided that the need/format would be better discussed through the planning application process as the SPD only recommends and does not require plot passports to be submitted.	No change
<b>Design Codes</b>					
David Grech, Planning Policy Officer, Historic England	4224	Object	Paragraph 9.3 - 9.6 Design Codes Site context will often help determine whether it is necessary to restrict design freedom in relation to certain design parameters. For example, if the site lies within a conservation area or its setting, or the setting of a listed building, scheduled monument and registered park and garden it will be important for the design code to exert some control over external appearance and scale. We recommend that this should be referenced in this section.	Agree	Add the following wording following the first sentence of paragraph 9.5:  'One example of where it would be important to consider fixing design parameters within a design code is where the site lies within a conservation area or its setting or the setting of a listed building, scheduled monument or registered park and garden. In these instances, it may be appropriate for the design code to exert some control over external appearance and scale'.
Clerk for Tasburgh Parish Council	4267	Comment	There should be no lower limit on how many homes are required to adhere to design codes where these are in place.	5 dwellings was considered to be a suitable limit for recommending design codes and plot passports on custom and self-build developments. However, paragraph 9.10 does recognise that they may be of benefit for sites less than 5 dwellings in certain circumstances and this discussion would form part of the application process if relevant.	No change
<b>Plot Passports</b>					
David Grech, Planning Policy Officer, Historic England	4225	Object	Paragraphs 9.7 - 9.10 Plot Passports  These documents should include reference to the historic environment where this site lies within a conservation area or its setting, or the setting of a listed building, scheduled monument and registered park and garden. We recommend that this requirement should be referenced in this section.	Agree	Add an additional bullet point to the lists at paragraphs 9.6 and 9.8 to read:  <ul style="list-style-type: none"> <li>• Any historic environment considerations (e.g. conservation area, listed building, scheduled monument or registered park and garden).</li> </ul>

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<b>10. Community Infrastructure Levy</b>					
Norfolk Homes Ltd	4258	Comment	<p>Whilst on the face of it, CIL exemption for self-build and custom-build and custom-build homes is beneficial, the process of pre-planning and applying for a phased development - premised thereon - is over-complicated. It is extremely difficult to work that into a development/build programme and phasing plan for a larger scheme.</p> <p>It should also be noted that throughout this section there is reference to self-build rather than custom and self-build.</p>	Noted. The premise of CIL exemption and its requirements are set out in legislation and are therefore beyond the scope of this SPD. The Government guidance that relates to CIL exemptions on which this section is based refers to 'Self-build' only.	No change
Clerk for Tasburgh Parish Council	4268	Comment	This section is very weakly worded and seems to give developers a loophole to avoid CIL payments which should be curtailed.	Self-build properties are exempt from paying CIL under the Regulations	No change
<b>11. Phasing</b>					
Norfolk Homes Ltd	4259	Comment	<p>Whilst on the face of it, CIL exemption for self-build and custom-build and custom-build homes is beneficial, the process of pre-planning and applying for a phased development - premised thereon - is over-complicated. It is extremely difficult to work that into a development/build programme and phasing plan. For a larger scheme</p> <p>It should also be noted that throughout this section there is reference to self-build rather than custom and self-build.</p>	Noted. The premise of CIL exemption and its requirements are set out in legislation and are therefore beyond the scope of this SPD. The Government guidance that relates to CIL exemptions on which this section is based refers to 'Self-build' only.	No change
Jim Selby, Assistant Planner, East Suffolk Council	4277	Comment	11.2 - Where it states "... then any commencement of the development would result in the loss of potential CIL exemption..." it would be helpful to expand and clarify what could be considered as commencement, such as the delivery of infrastructure on a site, which could trigger commencement across the whole development (where multiple plots are proposed).	Comment noted. This is covered in Section 10 on Community Infrastructure Levy but could be clarified further in this paragraph.	<p>Amend the final sentence of paragraph 11.2 to read:</p> <p>'... then any commencement of the development, such as the delivery of infrastructure, would result in the loss of potential CIL exemption...'</p>
<b>12. Self-build and affordable housing</b>					
Joe Bootman, Head of Land and Planning, Saffron Housing Trust	4213	Comment		This comment is acknowledged and the clarity requested is recognised but it is felt that this is a matter best discussed through the planning application process on individual sites rather than a blanket statement put into an SPD. Policy 5 does not explicitly exclude affordable housing developments from the self-build percentage requirement. It must also be recognised that self-build affordable housing may also come forward through sweat equity schemes.	No change

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13. Marketing Strategy					
Jim Selby, Assistant Planner, East Suffolk Council	4278	Comment	13.4 - We recommend that you set out your expectations for how a serviced plot for sale should be valued to help avoid any disagreements between parties in this respect.	This will be agreed through the planning application process.	No change
			13.5 - Paragraph is suggestive but not explicit. Would the councils be looking for a phased marketing strategy in this instance?	This will depend upon the circumstances of individual sites and will be agreed through the planning application process.	No change
14. Where to get further assistance					
Jim Selby, Assistant Planner, East Suffolk Council	4279	Comment	<p>General Comments</p> <p>We note that the councils have not included any form of Delivery Statement for custom and self-build. We have found a custom/self-build Delivery Statement to be very beneficial in terms of establishing an applicant's plans for serviced plots early in the process and also monitoring planning permissions. We recommend you include some kind of Delivery Statement in the SPD and include it in your planning application validation requirements.</p>	The inclusion of a Delivery Statement was considered during the early stages of drafting the SPD but it was concluded that it would not be beneficial to add another thing to the list of validation requirements.	No change