

Cabinet

Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr A Dearnley	Finance and Resources
Cllr R Elliott	Customer Focus
Cllr G Minshull	Clean and Safe Environment
Cllr L Neal	Stronger Economy
Cllr A Thomas	Better Lives

Date & Time:

Tuesday 4 January 2022
9.00 am

Place:

To be held in the Council Chamber at South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

Claire White tel (01508) 533669
Email: democracy@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

If a member of the public would like to observe the meeting in person, or speak on an agenda item, please email your request to democracy@southnorfolkandbroadland.gov.uk, no later than 5.00pm on Wednesday 29 December 2021.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

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Public speaking can take place:

- Through a written representation
- In person at the Council offices

Please note that due to the requirement to social distance, the Council cannot guarantee that you will be permitted to attend the meeting in person. There are limited places in the Council Chamber and the numbers of public speakers permitted in the room will vary for each meeting.

All those attending the meeting in person are asked to sign in and arrive/ leave the venue promptly. The hand sanitiser provided should be used and social distancing must be observed at all times. You will also be required to wear a face mask. Further guidance on what to do on arrival will follow once your initial registration has been accepted.

AGENDA

1. To report apologies for absence;
2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, “by reason of special circumstances” (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency
3. To receive Declarations of interest from Members
(Please see guidance – page 5)
4. To confirm the minutes from the meeting of Cabinet held on Monday 22 November 2021;
(attached – page 7)
5. Housing Allocation Policy Review;
(report attached – page 17)
6. Minimum Energy Efficiency Standards;
(report attached – page 52)
7. Report of the Chairman of Scrutiny Committee;
(report attached – page 60)
8. Review of Environmental Enforcement Penalties;
(report attached – page 63)
9. Starston Neighbourhood Plan Submission;
(report attached – page 74)
10. Redenhall with Harleston Neighbourhood Plan Submission;
(report attached – page 159)
11. Update to the Local Development Scheme;
(report attached – page 314)
12. Introduction of Monitoring Fees for S106 Agreements; (report attached – page 336)

13. Street Naming and Numbering Policy;

(report attached – page 345)

14. Cabinet Core Agenda;

(attached – page 360)

15. Exclusion of the Public and Press

To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

16. Planning, Regulatory, Housing Standards and Waste Team Services IT Migration;

(report attached – page 362)

17. Finance Cash Receipting System Business Case;

(report attached – page 339)

18. Browick Interchange Infrastructure Loan Request;

(report attached – page 410)

19. Food Enterprise Park (South Norfolk) Local Development Order;

(report attached – page 417)

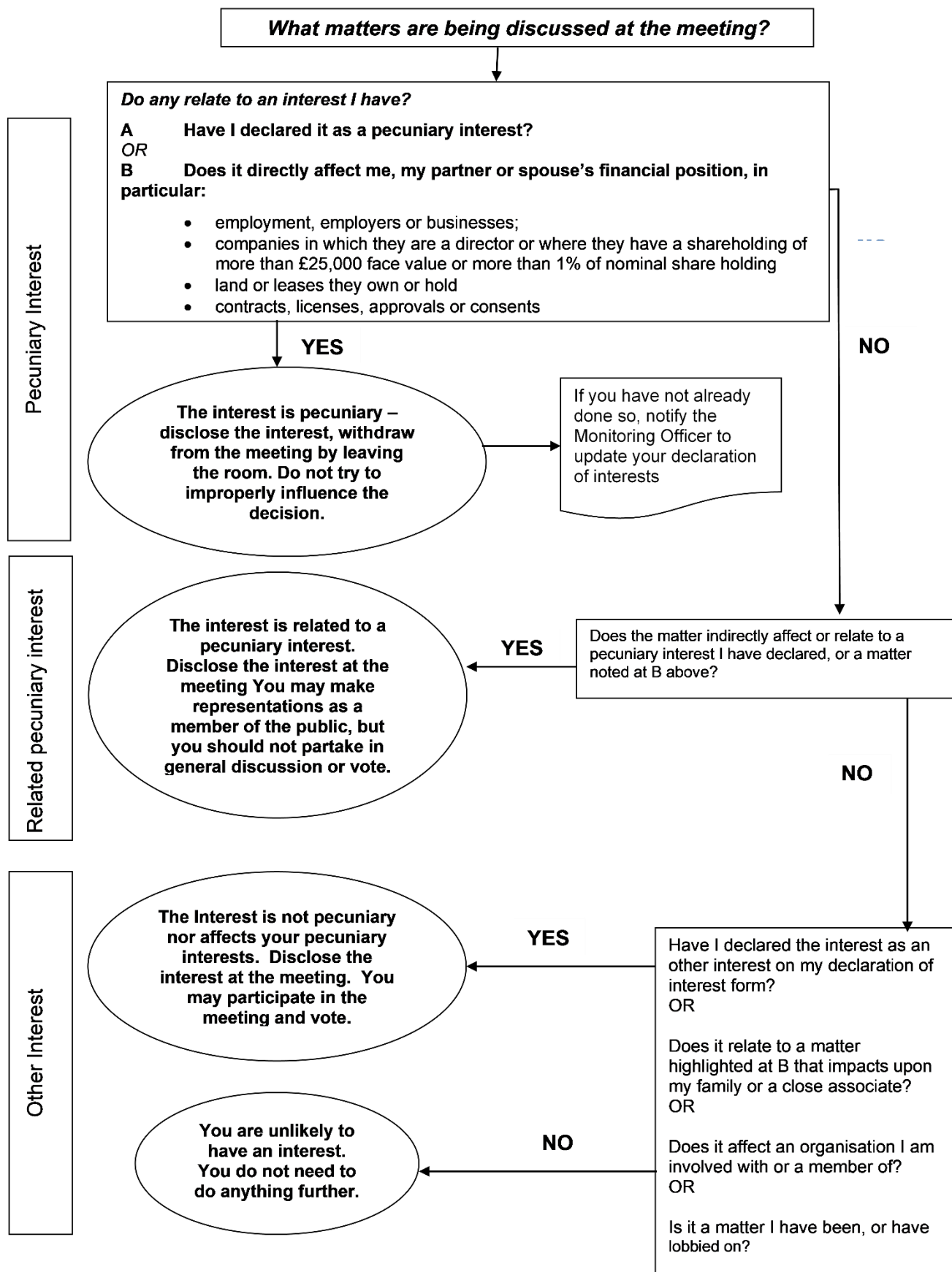
DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

<p>Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.</p>
<p>Does the interest directly:</p> <ol style="list-style-type: none"> 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4

CABINET

Minutes of a meeting of the Cabinet of South Norfolk Council, held on Monday 22 November 2021 at 9.00am.

Committee Members Present: Councillors: J Fuller (Chairman), A Dearnley, R Elliott, K Mason Billig, G Minshull, L Neal and A Thomas

Other Members in Attendance: Councillors: C Brown and T Laidlaw

Officers in Attendance: The Managing Director (T Holden), the Director of Resources (D Lorimer), the Director of People and Communities (J Sutterby), the Assistant Director Chief of Staff (E Hodds), the Assistant Director Individuals and Families (M Pursehouse), the Assistant Director OCT/Digital and Transformation (C Lawrie), the Assistant Director Planning (H Mellors), the Market Towns and Business Development Service Manager (D Disney), the Strategic Growth Projects Manager (N Cunningham), the Strategy and Programmes Manager (S Carey) and the Senior Finance Business Partner (M Bussens)

Also in Attendance: Two members of the public (Mr I Carstairs and Mr N Hart)

2944 MINUTES

The minutes of the meeting of the Cabinet held on 18 October 2021 were agreed as a correct record.

2945 Declarations of Interest

Cllr T Laidlaw declared an “other” interest with regard to minute 2948, the Strategic Performance, Risk and Finance Report For Quarter 1 And Quarter 2 2021/22, by virtue of being the local member for Old Costessy, and the Queens Hill Country Park.

2946 HOUSEFOLD SUPPORT FUND

Members considered the report of the Assistant Director of Individuals and Families, which sought agreement to spend Household Support Funding

provided from Central Government, on supporting those households who required additional financial help during the winter.

Cllr A Thomas commended the report to members, explaining that it proposed a sensible and practical approach to spending the funds allocated to South Norfolk, outlined at paragraph 4 of the report, and she referred to fuel poverty as an example of where funds could assist families.

The Director of People and Communities explained that £6.6 m had been awarded to Norfolk County Council to be used to help those enduring hardship over the winter period. Of this, £1.4m had been allocated to district councils, with South Norfolk receiving a £151,200 share. The Director of People and Communities explained that he was aware that Norfolk County Council planned to spend the money in a variety of ways, including through the voluntary sector, and via free school meals.

Discussion followed regarding the apportionment of funds, and the Chairman expressed his disappointment that the funds had not been directly awarded to those authorities with a statutory duty to deliver to those in need. He believed that district councils were in a good position to identify those most in need, and although he was grateful for the funds given, he suggested that the County Council could be lobbied to suggest a reapportionment of funds, especially in light of current inflation rates and the price of fuel. Cllr A Thomas stressed that it was important the funds were spent before March and she suggested that a request could be made to the County Council for additional funding, once the Council's apportionment of funds was exhausted, to see if there were surplus funds in other areas. It was agreed that the Managing Director and the Director of People and Communities would explore this further through the Norfolk Chief Executives Group.

The Chairman also raised the issue of the threshold for officers to spend funds under delegated powers and suggested that this be revisited to avoid the need similar reports to Cabinet in future.

RESOLVED:

To delegate the spend of the Household Support Fund to the Assistant Director of Individuals and Families in conjunction with the Portfolio Holder for Better Lives.

The Reason for the Decision

To ensure the most vulnerable households are supported throughout the winter period.

Other Options Considered

None.

2947 USE OF NORFOLK STRATEGIC FUND GRANT

Members considered the report of the Market Towns and Business Development Service Manager, which sought Cabinet approval regarding the use of the Norfolk Strategic Fund grant for public realm works in Harleston.

The portfolio holder, Cllr L Neal, commended the proposals, explaining that the preferred option of works, although more expensive than originally envisaged, would provide an excellent scheme, which provided a solution for the whole town, and would include traffic calming measures throughout.

The Market Towns and Business Development Service Manager outlined the background to the report and explained that the proposal was to fund the public realm works planned for Harleston through the Strategic Fund Grant of £428,527. Members noted that to support the favoured option of works, an additional £250,000 was being sought from the business rates pool; this would allow completion of the scheme and cover any contingencies.

The Market Towns and Business Development Service Manager advised that over 5,000 people had engaged with the consultation process, with the majority being in favour of the preferred scheme.

In response to a query regarding the loss of car parking spaces, members were advised that there would be an overall gain in the overall provision of spaces, once the scheme was complete.

Mr I Carstairs explained that both he and Mr N Hart were in attendance at the Cabinet meeting, as individual members of the public, but he knew that he spoke for many when he said that this was a key moment for Harleston and set the scene for a wonderful future for the town. He felt this was an excellent example of councils across the three tiers working together, and he paid tribute to Norfolk County, Harleston Town and South Norfolk Councils. He thanked officers for an excellent report and acknowledged that the proposals far exceeded his expectations and of many others in the town.

Mr N Hart also expressed his gratitude for the funding and commitment that had been demonstrated in ensuring that the scheme came to fruition.

Members expressed their support for the proposals and hoped that that the project would be an exemplar for other towns and larger villages in the area.

Cllr C Brown welcomed the plans, and requested that as far as possible, signage be improved to assist traffic accessing the town from the east, to ensure that that they took the most appropriate routes.

The Chairman agreed that this was a sensible request, and also suggested that an electricity connection within the marketplace would be extremely beneficial, if funds permitted.

RESOLVED:

To:

1. Endorse the proposed programme of activity to be funded from the Norfolk Strategic Fund grant of £428,527.
2. **RECOMMEND TO COUNCIL** that the £428,572 2021/22 capital budget for 'Norfolk Strategic Fund to support Economic Growth' (aka Harleston works) be increased by £250,000 to £678,572.
3. Approve a procurement exemption to use Norfolk County Council (NCC) as the single approved delivery partner.

The Reason for the Decision

To improve the street scene in Harleston, and encourage shoppers and visitors to the market town, which in turn will support local businesses.

Other Options Considered

To progress Option 1, however this would not deliver the desired whole town centre solution.

2948 STRATEGIC PERFORMANCE, RISK AND FINANCE REPORT FOR QUARTER 1 AND QUARTER 2 2021/22

Members considered the report of the Senior Finance Business Partner and the Strategy and Programmes Manager, which provided an overview of the performance of the Council, against the key items set out in the Delivery Plan for 2020/21.

Cllr A Dearnley, the portfolio holder for Finance, briefly introduced the financial position of the Council, explaining that it was important not to be complacent despite the favourable variance against the revenue budget. He also made reference to the capital overview, some elements of which he felt to be significant.

The Director of Resources referred to the estimated outturn of just under £1.5m surplus on the revenue budget, which had arisen from a number of areas. She stressed that these figures did not include the outcome of staff pay negotiations (the current figures had allowed for 1%). She also made reference to the table at paragraph 3.14 of the report, and the need to consider the suggestions put forward to utilise any underspend. She stressed that ongoing savings had already been taken into account as part of the budget process.

The Senior Finance Business Partner outlined in more detail the reasons for the favourable variance, as detailed in paragraphs 3.5 -3.9 of the report and

members noted that a more detailed analysis of the variances was attached at Appendix 1.

The Chairman agreed that there was no room for complacency and reminded members that the current year's budget was underpinned by the rollover of Covid grants and relied upon a healthy Leisure Service recovery. The Managing Director also referred to the significant uncertainty around local government finance.

Cllr A Thomas made the point that Covid funds would not be forthcoming in future, and although the funds would cease, there was no certainty that the demand for support would diminish at the same rate. She suggested that it might be prudent to hold on to some funds for the future.

Members considered the suggestions at paragraph 3.14 of the report, to utilise the forecasted budget underspend, and agreed with all the proposals, however wished to delete the plan for a £500k accommodation reserve, as it was felt to be premature.

In response to a query from Cllr T Laidlaw, the Chairman felt it would be premature to set up an earmarked reserve to fund a decarbonization programme and stressed the need to wait for the outcome of the debate on climate change at the full Council meeting on 6 December. He did however envisage that carbon neutrality would need to be a consideration as part of the budget setting process in February.

Cllr Laidlaw also asked why £40k had been proposed to be set aside for the investment in the Queens Hill Country Park, noting that its transfer to South Norfolk Council was imminent. The Assistant Director Planning explained that the land transfer had taken place and members noted that the proposed budget was to provide any additional aspirations for the site.

Turning to capital, the Senior Finance Business Partner explained that there was a £5.91m spend to date, with a forecast of a £16.9m spend against budget. Of this, £7.1m was against approved schemes, and the remaining £9.8m against schemes that had been classed as provisional. Members noted that of the £7.1m favourable variance on approved schemes, £5m had been against Big Sky projects. Of the £9.8m favourable variance on provisional schemes, £2.5m was against the depot refurbishment and £6.75m against the Browick Road development.

The Chairman reminded members that the depot refurbishment very much depended on expectations regarding food waste, which could see material changes to the number of bin lorries, staff, and space required.

Concerning the Big Sky projects, the Managing Director explained that the Cringleford project would be delivered slightly later than planned due to Covid and restrictions on labour and supplies. Cllr K Mason Billig added that there had been significant supply issues, but these issues were currently being resolved and future delivery would be within expected timescales.

Summing up, the Chairman stressed the need for a fundamental recasting of the capital programme in February, when next year's budget would be a consideration.

The Strategy and Programmes Manager then referred members to the performance of the Council, explaining that currently there were 13 performance measures on green and on target, 8 were currently amber and although not meeting target, were within the tolerances set, and 3 measures were red, and not meeting required targets. Members also noted that 3 other measures continued to be baselined, and 4 were annual measures and would be reported to Cabinet in quarter 4.

The Strategy and Programmes Manager then provided a brief overview of the key performance highlights and drew attention to a number of key areas of performance and areas for improvement, including homelessness, planning decisions and housing benefit applications. Members noted that details of all performance measures were outlined at Appendix 3.

During discussion, members referred to a number of areas where performance had exceeded expectations.

Referring to the Processing of Benefit claims and Planning Decisions made, both of which were red, the Chairman suggested that some of the categorization of measures required further thought. Both these indicators, although below the targets set by the Council, were exceeding national targets. Members noted that the Council was setting itself extremely high targets in some areas, and although it was good to have such high standards, it was felt that measures should only be categorized as red when real action was required.

Whilst discussing the performance of the Housing and Benefits team, members noted that it had been helping to provide additional support to residents, through its discretionary support services, and significant numbers of people continued to access support via the Help Hub and Social Prescribing work. Over 2,300 residents had benefitted from these services by the end of quarter 2, which far exceed the target set, and Cabinet agreed that this was a fantastic achievement.

In response to queries regarding the lack of measures concerning the Economy, and for example the number of businesses supported by the Council, officers explained that these were annual figures that would be reported in quarter 4. The Managing Director assured members that the team was working hard to deliver a new revised Strategy and would also be providing hard performance measures which would record both delivery and success.

Referring to the annual footfall of customers visiting the Council's leisure facilities, members felt that despite not achieving target (and being classed as red), it had actually exceeded expectations in light of the very challenging targets set, and difficulties with recruitment and retention. Members commended the team on a series of excellent campaigns on social media.

With reference to the percentage of household waste recycled, it was noted that this was reducing slightly. This could be attributed to the high numbers of household “clear outs” during lockdowns, however members felt it was important to encourage the public to recycle more, especially in light of the Environment Bill. The Chairman suggested that a more proactive social media campaign was required and that the matter be referred to the Economy and Environment Policy Committee for consideration.

Attention was drawn to the Delivery Plan and the Chairman requested that this be amended to indicate more clearly, which Councils (Broadland or South Norfolk, or both), had undertaken projects. He also referred to figures in the document which were represented by proportions, and he suggested that there was a need to detail these figures in real terms.

Cllr T Laidlaw referred to the strategic risk register and voiced concerns regarding the proposals to reduce the risk score from 9 to 6 with regard to the commercial uncertainties associated with decisions taken as part of the Council’s Commercial Strategy. He referred to the debt owed by Big Sky and could not see how the impact of this on the Council was reducing in any way.

The Chairman explained that the debt was reducing, as the stock was converted to cash, and he reminded members that the Council’s security was held against the stock and work in progress. The Managing Director added that the risks had reduced now that the acquisition of the site at Cringleford was complete and more stock had been built. The challenge for members going forward was the amount of capital it wished to see deployed through Big Sky in future, bearing in mind the relationship between the delivery of properties and the revenue return to the Council. The Chairman stressed that any future projects and requests for investment from Big Sky would be subject to a full business case.

Cllr Laidlaw thanked the Chairman for his response but suggested that the reduction in the capital deployed through Big Sky should be more clearly demonstrated in the Council’s papers.

RESOLVED:

To:

1.
 - (a) Note the revenue and capital position (variance details in Appendix 1)
 - (b) Agree the proposals for the usage of this year’s potential underspends, excluding the £500k proposed accommodation reserve.
2. Note the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 2).
3. Note the 2021/22 performance for Quarters 1 and 2 combined (detail in Appendix 3).

4. Note the update of the Delivery Plan for 2021/22 (detailed in Appendix 4)
5. Request that the Economy and Environment Policy Committee consider further the Council's communications with regard to recycling

The Reason for the Decision

To ensure that processes are in place to improve performance and that budgets are management effectively.

Other Options Considered

None.

2949 TREASURY MANAGEMENT QUARTER 2 REPORT 2021/22

Members considered the report of the Corporate and Treasury Accountant, which reviewed the treasury management activity during the first six months of the financial year 2021/22 and reported on the prudential indicators.

The Chairman introduced the report and referred to the interest received on external cash investments, commenting on how this had reduced dramatically from 2009/10 levels. However, he was pleased with the level of income from investments and the forecasted rate of return of 7.2% gross from investment properties.

With reference to Big Sky, the Chairman stressed the need for future reports to demonstrate the returns and gross money flows coming to and from Big Sky, as he did not believe that the current report provided a true picture of the total income received by the Council. Officers agreed that they would consider further how these figures could be demonstrated in future reports.

It was

RESOLVED:

To:

1. Endorse the treasury activity for the first half of the year and that it complies with the agreed strategy.
2. Note the 2021/22 prudential indicators for the first six months of the year.

The Reason for the Decision

To ensure that the Council's Investment Strategy remains prudent and complies with statutory requirements.

Other Options Considered

None

2950 MEDIUM-TERM FINANCIAL PLAN AND RESERVES UPDATE

Members considered the report of the Assistant Director of Finance, which provided an update on the Council's Medium-Term Financial Plan and reserves position.

The portfolio holder, Cllr A Dearnley introduced the report, explaining that it indicated a reasonably favourable position for the Council. He referred to the proposals regarding reserves, and also the City Deal for Long Stratton, which he believed would be the subject of a future report to Cabinet.

The Chairman was disappointed that the report did not include a copy of the plan, and he felt it was difficult to endorse, without one. He suggested that it might be an appropriate time to further consider the opportunities for borrowing, and he referred to a number of projects that he felt warranted consideration. He further suggested that all members should have an opportunity to discuss a reset of the capital programme and ambitions of the Council before the budget setting in February.

The Director of Resources explained that a summarised version of the Plan had been provided, to highlight the funding gap going forward and the risks around future funding arrangements and the New Homes Bonus and business rates income. Referring to the proposed reduction in the business rates reserve, she explained that the risk relating to the Norfolk and Norwich University Hospital being granted charitable status had ceased, and therefore a reduction in the reserve was recommended.

Members agreed the proposed changes to the earmarked reserves, however, requested that the recommendations relating to the Medium-Term Plan and the Capital Programme, be discussed in more detail at a future meeting of the Cabinet.

RESOLVED:

1. To **RECOMMEND TO COUNCIL** the following changes to the Council's Earmarked Reserves:
 - a) Creation of a new Feasibility Study Reserve of £0.6m for initial feasibility studies / investigations to support development projects.
 - b) Reduction in Business Rates Reserve from £5.169m to £2m.
2. That the recommendations regarding the Medium-Term Financial Plan and the Capital Programme, be considered further at a future meeting of the Cabinet.

The Reason for the Decision

To ensure that the level of reserves in place remains appropriate, and that the ambitions of the Council provide maximum benefits to residents.

Other Options Considered

None

2951 FUTURE OFFICE ACCOMMODATION PROJECT – APPRAISALS AND BUSINESS CASE

Members noted that this item had been withdrawn from the agenda and that the Council would not be in a position to make any substantive decisions regarding future office accommodation, until mid-January at the earliest.

2952 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

2953 EXCLUSION OF THE PUBLIC AND PRESS

It was **RESOLVED** to exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

2954 BROWICK INTERCHANGE LOCAL DEVELOPMENT ORDER

Members considered the exempt report of the Strategic Growth Projects Manager, regarding the Browick Interchange Local Development Order.

The Strategic Growth Projects Manager outlined the background and proposals of the report and drew members' attention to the associated risks.

The Portfolio Holder, Cllr L Neal commended the report to members, and after officers had responded to a number of queries, it was

RESOLVED:

To approve the recommendations, as outlined in paragraph 9 of the report.

The Reason for the Decision

To safeguard the employment land allocation

Other Options Considered

As outlined in the report

(The meeting concluded at 11.05 am)

Chairman

Housing allocation policy review

Report Author(s): Richard Dunsire
Housing & Wellbeing Manager
Tel: 01508 533620
Email: richard.dunsire@southnorfolkandbroadland.gov.uk

Portfolio: Better Lives

Ward(s) Affected: All Wards

Purpose of the Report:

This report sets out the review of our housing allocations policy and housing systems change, implemented in April 2021, and recommends updates to our housing allocation policy to reflecting the learning since April.

Recommendations:

The committee is asked to recommend to Cabinet:

1. Proposed changes to the housing allocation policy

1. Summary

- 1.1 The Housing team has been working with the new housing system and allocation policy since April 2021 with considerable success. As with all policy, regular reviews help to ensure understanding by residents and stakeholders, and fairness and transparency.

2. Background

In April 2021, following extensive joint member working, the best-in-class housing model was agreed. The first phase was to create one housing allocations policy and a single data system, making sure the key foundations of our housing service fit for purpose for the future. This system has been implemented during a period of increasing demand as we have seen an increase in the use of temporary accommodation, and increased cases due to requests to move, through increased antisocial behaviour, domestic abuse, and resident debt.

There is also a shortage of properties both in the private and social sector, meaning demand outstrips supply. This has been caused by a range of issues including a slowdown in building during Covid, demand on supplies and equipment and the shortage of tradespeople to carry out works.

3 Current position/findings

- 3.1 The single data system was delivered on time and implemented in April 2021. The new system will provide £72,987 savings over four years.
- 3.2 Team performance remains strong despite the increased demand. The implementation of a new single system did cause disturbance to the team as staff were learning a new system. However, the One Team approach has provided far more benefit in the form of more continuity, efficiency, resilience, and structure in the way the team are now able to approach workloads.
- 3.3 Officers have also utilised Covid recovery funding and additional central government funding, which has allowed the team to temporarily grow to cope with demand. Due to this and the single approach, performance has remained strong in spite of increased demand pressures, as seen below. Further performance data is available in appendix 1.



- 3.4 The aligned housing register is working as expected even though competition remains high for homes. Residents with higher needs are generally obtaining suitable preferences within their own district areas, before looking to the other district. Residents seem to be understanding the cross-district boundary approach and welcome the additional choice that this brings. Movement between districts is occurring both ways and leading to better outcomes for residents.
- 3.5 The online customer portal is working very well, and we now have one of the most easily accessible housing registers available, due to its online format. Customers are able to access on their terms at any time of day or night, when facing housing concerns. However, we retain other means for customers to contact us if they cannot access online services, such as telephone or appointments.

4 Proposed action

- 4.1 It is good custom and practice to review a housing allocations policy every 12 months, to update to allow for any changes in economy or social setting. This is particularly important after our new two Councils, One Team approach. Parts of the policy need to be tightened up now that it has been exposed to real cases, and proposed changes from operational learning are proposed in appendix three. These changes are split into three specific categories:
- Changes to the core policy: a small number of changes to the core policy which are not working now we have put the policy into practice.
 - Updating and rewording to the policy: majority of changes are in this category where we are seeking to clarify the policy as we have found residents are confused around what the policy means, or there is too much ambiguity in the policy, which affects interpretation.
 - Splitting guidance from core policy – In order to make sure all residents and partners understand what we were trying to achieve, the policy document amalgamated the guidance, procedural document, and policy. This has in fact caused more confusion as customers struggle to find the key information they need. We will therefore split out the key elements to enable a clearer understanding.
- 4.2.1 This report and the proposed changes to the Housing Allocations Policy were considered at Scrutiny Committee on 8 December 2021. During which the committee resolved to recommend to Cabinet that the Housing priority bands at 4.4.11 be amended to 'Emergency Band, Band 2, Band 3, Band 4..

Following Scrutiny Committee, Officers commissioned a focus group to obtain feedback from residents currently working with housing. We gave residents the options presented by officers (Option 1 in the table below) and the

recommendation of Scrutiny Committee (option 2 in the table) for the banding names:

Option 1	Emergency, Band 1, Band 2, and Band 3
Option 2	Emergency, Band 2, Band 3, and Band 4.

The feedback received was 80% in favour of Option 1, therefore based on this feedback, officers continue to propose to Cabinet that the band names be amended in line with Option 1, as shown in Appendix 2 and would request that the recommendation from Scrutiny Committee is rejected in light of the focus group feedback.

5 Other options

- 5.1 The council could decide not to introduce updates to the new policy and leave for another six months before review. However, we are aware of several improvements now and it is likely that this would delay changes which we would make anyway in the future.

6 Issues and risks

- 6.1 Resource Implications – none, these changes would not affect the resources allocated
- 6.2 Legal Implications - none
- 6.3 Equality Implications – An equalities assessment was completed for the original policy and has been updated with the proposed changes. Please see the attached
- 6.4 Environmental Impact – None.
- 6.5 Crime and Disorder – none
- 6.6 Risks – None

7 Conclusion

- 7.1 The housing system implementation has been a success and provided more resilience and savings. The introduction of the new policy had demonstrated the effectiveness of the two Councils, one team, is helping the team cope with demand in challenging economic environment and has provided learning to continuously improve the way we support those who need housing support.

8 Recommendations

The committee is asked to recommend to Full Council the:

1. Proposed changes to the housing allocation policy

Equalities and Communities Impact Assessment

Name of Officer/s completing assessment: Victoria Parsons

Date of Assessment September 2021.
Updated November 2021

1. What is the proposed Policy (please provide sufficient detail)?

Broadland District Council Allocations Scheme South Norfolk Council Allocations Scheme

Social housing is a much in demand resource and allocations schemes as policy documents have to clearly set out the process by which available social housing is allocated to households on the housing list, including how households are assessed as being eligible for social housing and prioritised.

The schemes were developed jointly by Broadland and South Norfolk Councils as part of the Best in Class Housing Offer and while two Allocations Scheme documents have been created to facilitate individual Council branding however, the content of the schemes is broadly the same. It is vital that the documents are kept under periodical review to ensure that they remain accurate and reflect current legislation and best practice.

As the schemes have been in force for nearly 6 months, this review also aims to remove any anomalies or loopholes identified where practical application identifies areas of the policy document that can be open to further interpretation.

The changes being proposed can be can be categorised under three themes:

- Policy Change
- Sections requiring updating or rewording to include more detail/guidance:
- Section to be moved to supplementary guidance document

These changes do not reflect a change in operational practice but instead seek to provide definition and clarity for officers, members and the public. As a result of this, the outcomes of the assessment are broadly neutral. Where a change has a perceived impact, this has been outlined at question 4 below.

This EqCIA has been updated following consultation on the proposed amendments with both Council's Portfolio Holders and the Chairs and Vice-Chairs of the relevant policy development panels in November.

2. Which protected characteristics under the Equalities Act 2010 does this Policy impact: (indicate whether the impact could be positive , neutral , or negative)			
Protected Characteristic	Potential Impact		
	Positive	Neutral	Negative
Age		✓	
Disability		✓	
Race		✓	
Sex		✓	
Religion or Belief		✓	
Sexual Orientation		✓	
Marriage/Civil Partnership		✓	
Pregnancy/Maternity		✓	
Gender Reassignment		✓	
3. Which additional Communities characteristics does this policy impact?			
Health		✓	
Place inc. Rurality		✓	
Low Income and Poverty		✓	

4. What do you believe are the potential equalities and communities impacts of this policy?

Please include:

- Partnership organisations worked with in the development of this policy
- Evidence gathered to inform your decision
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above
- Steps taken to mitigate, for example, other services that may be available
- If a neutral impact has been identified can a positive impact be achieved?
- If you are unable to resolve the issues highlighted during this assessment, please explain why
- How impacts will be monitored and addressed?
- Could the decision/policy be implemented in a different way?

- What is the impact if the decision/policy is not implemented?

Note: Impacts could be **positive**, **neutral**, or **negative** and impact groups differently

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
3.1.2	Persons from Abroad	Removed paragraph <i>The rules will change from 2021 due to the UK's exit from the EU and new regulations regarding eligibility for housing based on the EU settlement scheme. This policy will be amended to take into account any new rules.</i> The rules and eligibility are fully covered within the current policy	All characteristics Neutral	Paragraph is out of date and does not impact application of the allocations scheme.
4.4.11 Band 1	Removing from the Housing Priority Bands Band 1 People with an urgent need for an adapted property Band 2 Someone needing an adapted property	 The need for an adapted property falls within medical needs and it covered by this in the policy and priority bandings. (please see below regarding updates to the Medical need) The need for an adapted property falls within medical needs and it covered by this in the policy and priority bandings. (please see below regarding updates to the Medical need)	Disability Health Age Neutral/Negative	Removing this from the priority bands provides clarity for applicants and officers. It will be included as part of the priority bands for medical need. This will mean that priority for adapted properties will be assessed on need with applicants placed in Bands 1-3. There may be some cases that would previously have been assessed as being in band 2 will now be in band 3, however that will be commensurate with their need and allows those given priority bands 1 and 2 to be given swifter access to appropriate properties. Those assessed with urgent (band 1) or high (band 2) medical need will not see a change in banding. The Councils also seek to encourage availability of adapted properties by providing band 2 priority for those who are current tenants living in adapted properties that are no longer needed.
3.3	The Armed Forces Covenant	Update wording <i>Special consideration is appropriate in some cases, especially for those who</i>	Disability Age Sex and Gender	This wording provides detail and clarification and links the special consideration given to the relevant legislation, including where Section 166A(3) of the

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		<i>have given most such as the injured and the bereaved (as defined in Section 166A(3) of the Housing Act 1996 as amended by regulations made under section 166A(7))</i>	Health Neutral	Housing Act 1996 refers to definitions provided by s.374 of the Armed Forces Act 2006, also referred to in 3.3 bullet-point 3 of the Allocations Scheme. It is expected any impact will be neutral as a result of this amendment.
4.4.6 f	Priority on health grounds	Update wording to remove 'unreasonable': <i>you, or someone in your household, has either a permanent and substantial disability, or a severe long term limiting illness, or the severest form of learning disabilities or behaviour problems and for you to share a bedroom with that person would seriously affect the sleep of those you would normally share with, to the severe detriment of their or your health</i>	Disability Health Age Positive	Removal of the word 'unreasonable' seeks to resolve any ambiguity for this priority ground. The focus is less on whether it is reasonable to share a bedroom and more about the impact that would result from sharing. It is felt that this is a positive impact. It also ensures that two+ bedroom adapted homes are directed towards those with the most need.
4.4.6 f	Priority on health grounds	Update wording to essential health treatment <i>you are having essential health treatment at home that needs large machinery or a stock of health supplies to be stored e.g., you are having renal dialysis at home</i>	Disability Health Age Neutral/Negative	The inclusion of the word essential may mean that those assessed as having non-essential health treatment at home would not be entitled to additional space on health grounds resulting in a negative impact. In mitigation this amendment is being made to ensure that priority is given to those with the highest need.
4.4.6 g	Priority on health grounds	Remove category A or B <i>An additional recommendation that can be made is that an applicant must have ground floor on health or disability grounds or must have a ground floor property that is wheelchair accessible</i> category A or B	Disability Health Age Neutral	Category A or B refers to practice adopted through London Borough Councils and is not used by Broadland or South Norfolk Councils. In terms of any impact, while categories A and B represents specific levels of accessibility, not adopting them widens the scope of properties that can be available meaning that, providing they are appropriate for need, those on the housing list, can find a suitable property sooner.

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
4.4.11	Housing Priority Bands	Change band names from Band 1 Band 2 Band 3 Band 4 To Emergency Band Band 1 Band 2 Band 3	Disability Health Age Neutral	Amendment to the change of name of the bands. It seeks to give clarity that to residents that the top band is for those in emergency situations.
4.4.11 (Band1)	Housing Priority Bands	<i>People with an urgent medical need Inc. hospital discharge</i> Update wording for more clarification and to include adapted properties to: <i>People with a serious medical need who are unable to be discharged home from medical care due to their changed accommodation need. This may include access to an adapted property.</i>	Disability Health Age Neutral/Negative	This change in wording provides clarification. It seeks to give the urgent priority to those with a serious medical need who, if they were discharged from medical care would be at risk of homelessness due to changed accommodation need. This includes where there is a need for an adapted property. This seeks to reduce delayed transfers of care from medical care, prevent re-admittances and ensure throughput for other people. This may mean that some applicants who would previously have been eligible for band 1 will now be given band 2 – High priority instead. In mitigation, demand for socially rented properties is high and the Council has to take steps to ensure that those most in need have greater priority, this includes considerations of wider impacts such as the provision of beds within the health system.
4.4.11 (Band 2)	High Medical Need	See Band Considerations	Disability Health Age Neutral	Amendments provide clarity on how applicants will be assessed for high and medium medical need.
4.4.11 (Band 3)	Medium Medical Need	See Band Considerations		

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		<p>Add medical need to band considerations</p> <p>Priority on Health Grounds</p> <p><u>A high medical need</u> will be awarded where the applicant or a member of their household has an urgent need to move because their accommodation is unsuitable and cannot be made suitable. An applicant will be assessed as having an urgent need to move where there is an imminent risk of health deteriorating as a result of the unsuitability of the accommodation and there is a clear expectation, supported by relevant health professionals that a change in accommodation will have a significant impact on their health and wellbeing. This includes access to adapted properties.</p> <p><u>A Medium medical need</u> will be awarded where the current home is causing the applicant significant problems and whilst they are managing to some extent, a change in accommodation could reasonably be expected to alleviate or significantly improve the problem. The need will be supported by relevant health professionals. This includes access adapted properties</p>		

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
4.4.11 (Band 2)	High Welfare need	See Band Considerations	All characteristics Neutral	Amendments provide clarity on how applicants will be assessed for high and medium welfare need.
4.4.11 (Band 3)	Medium Welfare Need	See Band Considerations		
4.4.11	Band Considerations	<p>Add Welfare need to band considerations</p> <p>Priority on welfare needs will only be awarded after an assessment confirms that a change of accommodation could reasonably be expected to alleviate the problem.</p> <p><u>A high welfare need</u> will be awarded where there is an urgent need to move as the circumstance is having a severe impact on the household's wellbeing or where there may be an imminent risk of future homelessness.</p> <p><u>A medium welfare need</u> will be awarded where the need to move is not urgent, but the circumstance is causing the applicant significant problems and is substantially affecting their wellbeing. Applicants may be provided with additional information and advice relating to their welfare need and may be signposted to appropriate agencies and services which provide specialist support. A welfare need may include, but is not limited to financial difficulties, anti-social behaviour, harassment, and</p>		

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		isolation. Circumstances will need to be verified and multi-agency information sharing, and assessment may be required, but it remains the Council's decision to determine if there is a housing need and the level of priority which should be awarded.		
4.4.13	Household type and property size allowed	In Carer household update wording to include overnight: <i>A bedroom will be allocated if the carer needs to reside at the property overnight and is not already part of the permanent household</i>	Disability Health Neutral	It is anticipated this change is neutral. Bedroom allocations are afforded to ensure the property size is appropriate for the household and also to make the best use of available housing. This amendment provides greater definition on the conditions for a bedroom allocation in that extra space is required for any carers who are not part of the household but are required to give overnight care to use for sleeping in.
4.4.13	Medical	Update wording to: Property Size <i>A bedroom will be allocated if recommended and evidenced as part of the medical need</i> Conditions <i>Subject to an agreed and evidenced medical need where the extra room may be needed to accommodate large essential equipment or there are serious mobility issues.</i>	Disability Health Neutral	It is anticipated this change is neutral. Bedroom allocations are afforded to ensure the property size is appropriate for the household and also to make the best use of available housing. So bedroom allocations can be provided accurately, the amendment provides definition that medical need for an additional room for large essential equipment or where there are serious mobility issues are evidenced.
4.4.11	Band Considerations	Band 1 will only be valid for 8 weeks. This can be extended where the applicant has not placed a bid because no suitable vacancy has arisen during that period. If the applicant does not meet the extension criteria, their priority will be reduced to Band 3 and they will	All characteristics Neutral	This could impact on all characteristics but markedly those more likely to be in temporary accommodations. This could be households with children, young homeless people and those with more complex needs including mental health needs. However, this amendment has been rated as neutral as although it restricts the time band 1 will be available for, this extended oversight

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		be directly offered the next available property suitable to their needs. If they refuse the offer of that property, the Council will view any housing duty as having been discharged.		allows the Council to recognise early where bidding is not taking place and to work to support and encourage those households to bid. It also seeks to make the best use of social housing, to minimise void times and to ensure good availability of temporary accommodation.
4.4.11 (Band 1)	Housing Priority Bands	s193 Duty and in TA/s189 Relief Duty, update wording to: <i>A homeless applicant who is either owed a s193 Duty and is currently living in temporary accommodation or who is owed a s189b Duty, have been placed in interim accommodation and is not likely to be assessed as intentionally homeless.'</i>	All characteristics Neutral	This amendment seeks to close a loophole in relation to priority banding and intentional homeless with the aim of ensuring the policy aligns intentional homelessness to priority band 3. Those who are intentionally homeless may identify as having any of the protected characteristics and can include those who are homeless as a result of: <ul style="list-style-type: none"> • Accruing rent/mortgage arrears • Anti-social behaviour or perpetrating domestic abuse • Leaving or being sacked from employment that had accommodation with it. • Refusing a reasonable offer of accommodation by the council. In mitigation, each application will be assessed individually and priority is afforded to those in the most need in order to make the best use of a scarce resource.
4.4.11 (Band 2)	Housing Priority Bands	Threatened with Homelessness and in Priority Need (next 12 weeks update to: <i>'An applicant in priority need who is either homeless or threatened with homelessness within the next 12 weeks and who is not likely to be assessed as intentionally homeless'.</i>		
4.4.11 (Band 2)	Housing Priority Bands	Disrepair/Unsafe Home/Lacking essential amenities Add note to definition of this: <i>Essential amenities means applicants living in homes lacking: : A kitchen (or cooking facilities)*, a bathroom, an inside WC, running water, or electricity.</i>	Age Health Disability Neutral	This may apply more to applicants who are older and those who have a disability or long term health condition, including those with hoarding and self-neglect behaviours. It is expected this is a neutral impact as it provides clarity on a definition of disrepair, unsafe homes and lacking essential amenities. The Councils will enable earlier access to the housing list and it asks that properties are considered eligible for formal action by Housing Standards teams rather than requesting that formal action has taken place. In some cases, work will be undertaken with partner organisations such as adult

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		<i>Disrepair/Unsafe Home A property assessed by the Council's Housing Standards department under the Housing Health and Safety Rating System and considered eligible for formal enforcement through either Improvement , Prohibition, Emergency Prohibition and Hazard Awareness Notices (including Suspended, Improvement and Prohibition Notices)</i>		social care to ensure the most appropriate outcomes are achieved.
4.4.12	Determination of Effective Band Date	Wording to be updated to: <i>If you are statutory homeless, the effective band date will be the date in which, through our investigations, you were deemed as actually homeless.</i>	All characteristics Positive	Reflects the date on which an applicant was deemed as actually homeless rather than the date a homelessness duty was accepted.
3.2	Qualification Rules	Update the employment requirements to: <ul style="list-style-type: none"> Have a current contract of employment that is effective, within Broadland / South Norfolk. Where it is anticipated employment will last 6 months 	Place/Rurality Neutral	This amendment may mean that those from outside of the district where their current employment contract is less than 6 months will not qualify. In mitigation, contracts under 6 month's duration are not numerous and amending the requirements supports best use of local social housing.
3.2	Qualification Rules	Move-on from supported accommodation <i>If they are residing in a supported housing project and approaching the Councils via a Move-on arrangement, they will have to have resided at the project at least 6 months before submitting an application. If the specialist provider has a move on arrangement with the Council this will provide the local connection</i>	All characteristics Neutral	This amendment is to reflect the process as laid out in the Move-on agreement and provides qualification for those who may have moved from out of the area into supported accommodation which is located in the district providing they have been there for at least 6 months. Adding the words <i>in the district</i> clears up any ambiguity for applicants and supported accommodation providers and removes the possibility that applicants that don't have a connection to the district and are in supported accommodation in another area would apply to join the register under the Move-on agreement. This

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		Update wording to: <i>If they are residing in a supported housing project in the district and approaching the Councils via a Move-on arrangement, they will have to have resided at the project at least 6 months before submitting an application. If the specialist provider has a move on arrangement with the Council this will provide the local connection.</i>		enables the Councils to make the best use of housing stock and ensure homes are available to those with the most need.
3.2	Qualification Rules	Move-on from supported accommodation <i>Are living in accommodation-based support services outside the district to which they were referred by or with the agreement of the Council and they lived in Broadland for 6 months immediately prior to the placement.</i> Update wording to: <i>Are living in accommodation-based support services outside the district to which they were referred by or with the agreement of the Council and they met the qualification criteria immediately before the placement.</i>	All characteristics Positive	The prior clause restricted qualification criteria under this category to those who had lived in the district immediately before placement. It did not include those who would qualify in another way, for example, through employment. This amendment widens that qualification criteria and is considered a positive impact.
4.4.11 (Band 2)	Housing Priority Bands	Tenant under-occupying by 1 or more <i>Tenant in social housing, within the Broadland or South Norfolk district under-occupying by 1 or more bedrooms (current property unaffordable)</i>	Place/Rurality Neutral	The amendment clarifies this banding and seeks give priority to existing tenants in the district to ensure they can move from a property that is bigger than needed and unaffordable. This mean that private rented tenants and those from outside the area will not have this priority afforded to them although they may sit elsewhere in the housing priority bands, dependant on individual circumstances. In mitigation, this criteria will

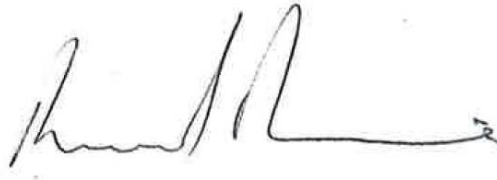
Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
				help eligible households to prevent a potential build-up of arrears and possible homelessness. It also aims to free up a much in demand larger socially rented property
4.4.11 (Band 3)	Housing Priority Bands	Tenant under-occupying by 1 or more bedrooms update to: <i>Tenant in social housing, within the Broadland or South Norfolk district under-occupying by 1 or more bedrooms (current property affordable)</i>	Place/Rurality Neutral	As above, however as the property is considered affordable, a lower priority band is given.
4.4.11 (Band 3)	Housing Priority Bands	Two existing socially rented households moving into one property updated to: <i>Two existing socially rented households moving into one property, where at least one of the properties is in Broadland or South Norfolk Districts</i>	Place/Rurality Neutral	This amendment provides clarification in existing practice that one household must be an existing socially rented tenant in the districts. While this would then exclude socially rented tenants from outside of Broadland or South Norfolk, this ensures best use of local social housing and, where both households are in Broadland or South Norfolk, aims to free up a socially rented property.
3.4	Non-Qualification Rules	Add 3.4 m <i>'They or a member of their household, own residential property or are in the process of purchasing residential property, including a Right to Buy or Right to Acquire and have the financial means to find their own housing solution'</i>	All characteristics Positive	Currently we have non-qualification rules about capital and investments currently held. However, it does not cover applicants who are in the process of purchasing property. Tightening up of the definition around home ownership and access to social housing. A homeowner or potential homeowner with no housing need should not need access to social housing and to ensure that properties go to those in the greatest need, customers with the means to find their own housing solution should be encouraged to do so.
3.4	Non-Qualification Rules	Add 3.4 n <i>They or a member of their household are in arrears or have a debt of more</i>	All characteristics Neutral	This was not included in the policy non-qualification rules and aligns with 3.4 (f) that those with rent or mortgage arrears will not qualify. This could impact, for

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		<i>than £1000 with the council. This can include but is not limited to rent in advance, deposits, loan, Council Tax arrears, and temporary accommodation charges.</i>		example, on those with a low income, those who have arrears due to a health including mental health condition or those experiencing domestic abuse. In order to mitigate this, each application will be assessed individually for exceptional or mitigating circumstances (3.5)
3.4	Non-Qualification Rules	Add 3.4 o <i>Applicants who have deprived themselves of assets, to include property, savings or income will be treated as still possessing the value of the asset and will not qualify where, had the asset not been transferred, they would have had sufficient financial resources. Consideration will be given to the personal circumstances of the applicant and the length of time which has passed. Information and advice will be provided on alternative housing options. When considering this we will also consider benefit regulations with regard to deprivation of capital.</i>	All characteristics Neutral	Tightening up on rules for non-qualification if the applicant has gifted, transferred, or spent assets and worsened their housing situation. Someone who has knowingly done this should not have access to social housing, and these rules follow benefit regulations and those set out for care funding.
4.8	Deliberate or worsening of circumstances	To be added to 3.4 <i>Homeowners who have transferred their property to another family member within the last 5 years from the date they make their application to the register</i>	All characteristics Neutral	
3.4f	Non-Qualification Rules	Update working to add mortgage arrears section: <i>They, or a member of their household is/was responsible for paying rent or a mortgage and they have rent arrears or mortgage arrears and/or court costs greater than 16 weeks if charged weekly or greater than 4 months if charged</i>	All characteristics Neutral	This change in wording closes a loophole in the policy that those with mortgage arrears and applicants and household members with sufficient financial resources including income are able to circumnavigate non-qualification clauses. This provides parity to all applicants. As above, each application will be assessed individually for exceptional and mitigating circumstances under 3.5 and those with sufficient

Location in policy	Item	Detail	Believed impact Positive Neutral Negative	Rationale/Mitigation
		<i>monthly and they have not met the criteria for reassessment.</i>		financial resources will be advised on low cost home ownership schemes or supported to access the private rented sector.
3.4 I	Non-Qualification Rules	Update wording to add household: <i>Applicants and their household who are considered to have sufficient financial resources to secure accommodation within the private sector.</i>		
3.4 I	Non-Qualification Rules	Update wording to include income: <i>Sufficient financial resources includes any income, assets or investments even if they are not immediately available to the applicant such as any residential or non-residential property that they own, or part own anywhere in the UK or abroad.</i>		
4.4.11 (Band 2)	Housing Priority Bands	Overcrowded by 2 or more bedrooms (affordability test) Update to remove affordability test, as this is not required when overcrowded	Age Disability Health Pregnancy and Maternity Low Income Neutral	This amends wording in the policy to reflect practice that affordability will not be assessed by the council at the point at banding when an overcrowding by two or more bedrooms banding is given and may impact, for example, on those on low incomes, those with larger families and households with a family member with a disability. However, at point of successful bidding for a property, affordability will be checked by the registered provider as part of standard checks (??)

Signed by evaluator: Victoria Parsons


Signed by responsible head of department:

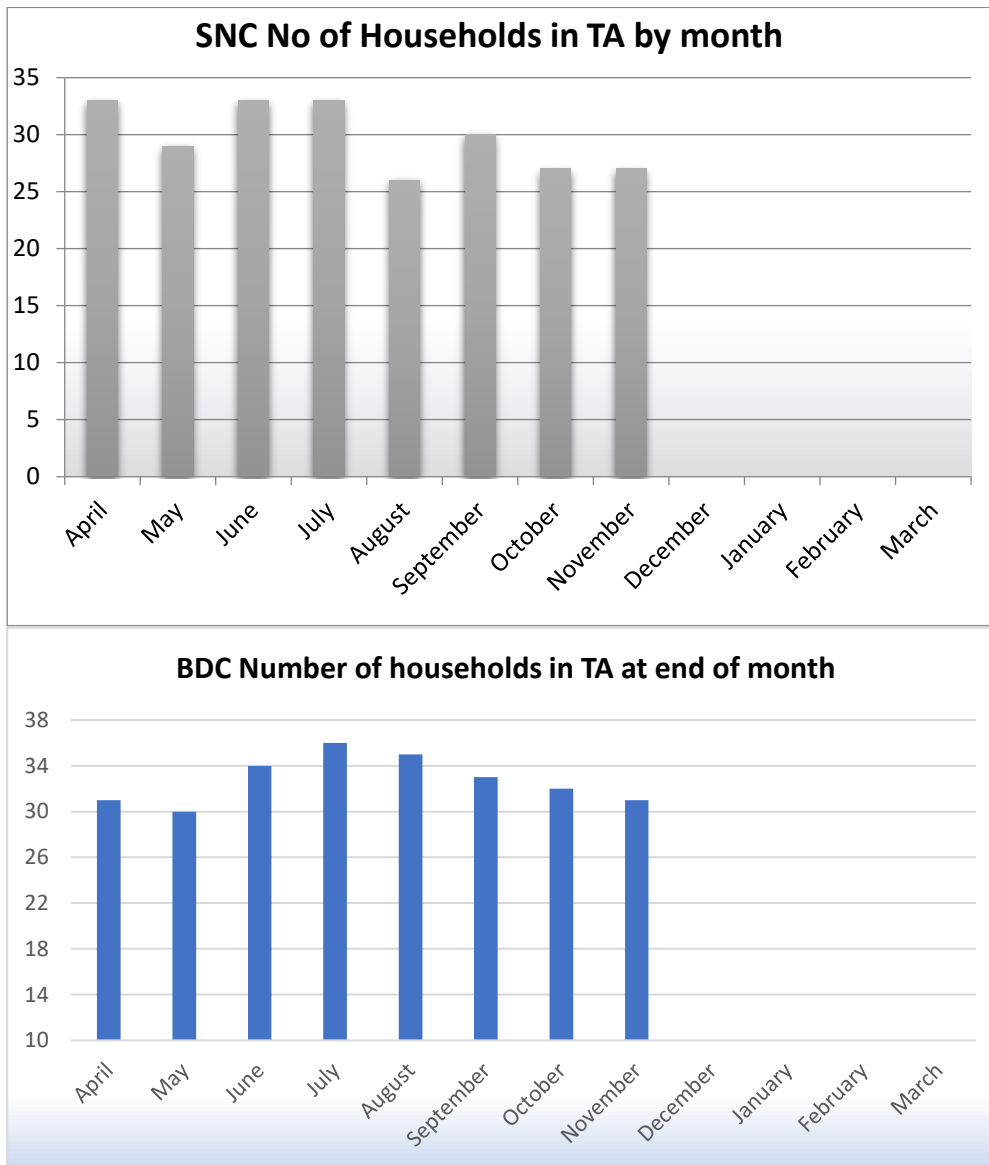


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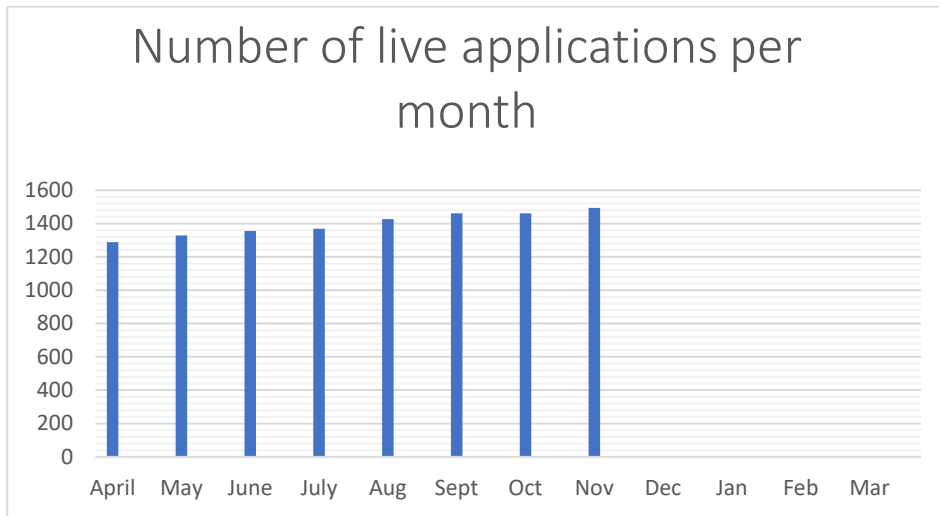
REVIEW DATE : September 2022

Appendix 1

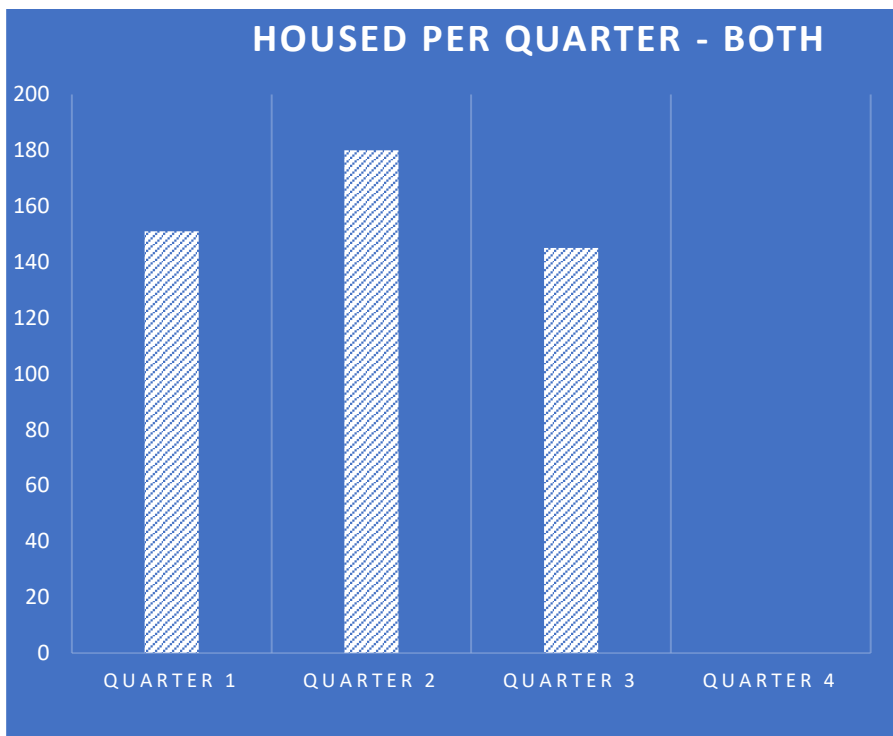
Temp accommodation (TA) levels



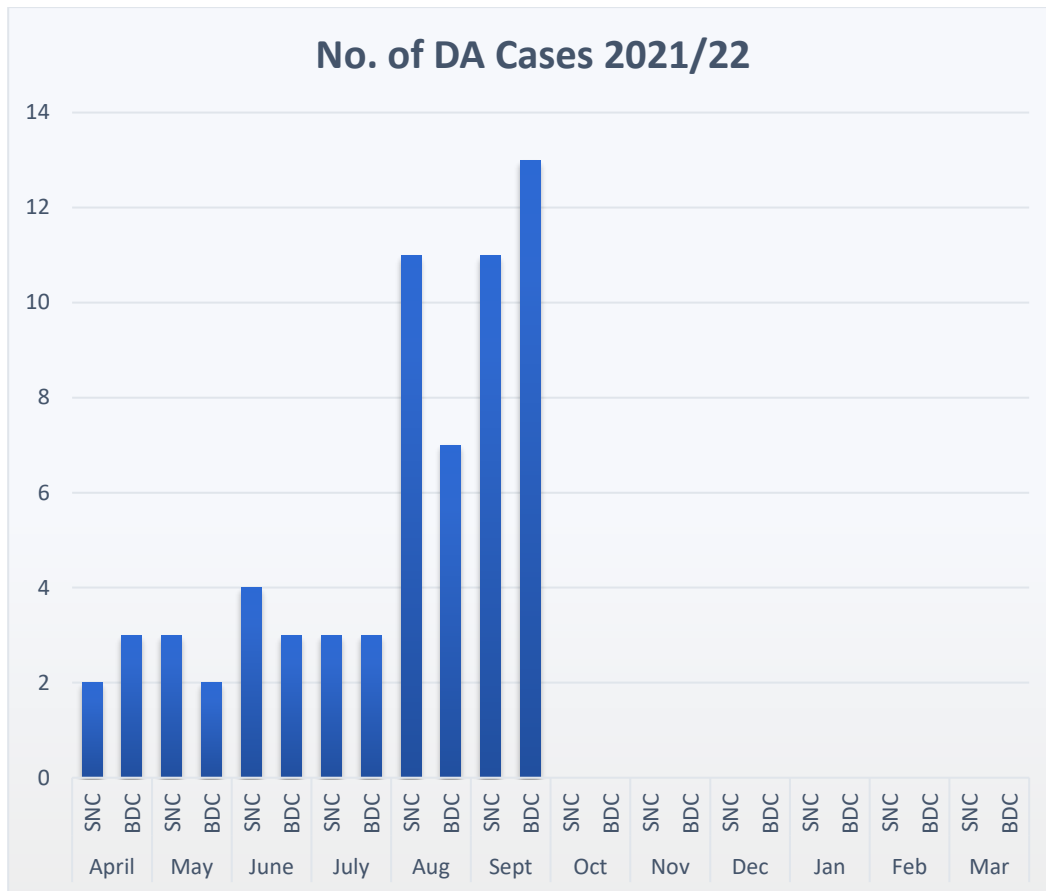
Housing register



Housed into social rent



No of Domestic Abuse (DA) cases



Appendix 2

Proposed updates and changes to the Housing Allocations Policies

From April 2021 Social Housing in South Norfolk has been allocated under the Housing Allocations Policy. Since working with the policy, we have found issues and areas where there would be benefits to updating the current policy.

The suggested changes below will give residents, officers, and other organisations more clarity around qualification and priority need, as well as reducing the number of queries, reviews, legal challenges, and complaints received.

Please find below the suggested alterations to the Housing Register Policy. These have been categorised into three areas:

- Changes to the core policy: a small number of changes to the core policy which are not working now we have put the policy into practice.
- Updating and rewording to the policy: majority of changes are in this category where we are seeking to clarify the policy as we have found residents are confused around what the policy means, or there is too much ambiguity in the policy, which affects interpretation.
- Splitting guidance from core policy – In order to make sure all residents and partners understand what we were trying to achieve, the policy document amalgamated the guidance, procedural document, and policy. This has in fact caused more confusion as customers struggle to find the key information they need. We will therefore split out the key elements to enable a clearer understanding.

1. Policy Changes

Section Number	Section detail	Changes required	Rationale
3.4	Non- Qualification Rules	Add 3.4 m 'They or a member of their household, own residential property or are in the process of purchasing residential property, including a Right to Buy or Right to Acquire and have the financial means to find their own housing solution'	Currently we have non-qualification rules about capital and investments currently held. However, it does not cover applicants who are in the process of purchasing property. Tightening up of the definition around home ownership and access to social housing. A homeowner or potential homeowner with no housing need should not

			need access to social housing and to ensure that properties go to those in the greatest need, customers with the means to find their own housing solution should be encouraged to do so.
3.4	Non-Qualification Rules	Add 3.5 n They or a member of their household are in arrears or have a debt of more than £1000 with the council. This can include but is not limited to rent in advance, deposits, loan, Council Tax arrears, and temporary accommodation charges.	This was not included in the policy non-qualification rules, we can mitigate this with those that are engaging with a payment plan and work with us under the exceptional or mitigating circumstances in section 3.5 of the policy.
3.4	Non-qualification Rules	Add 3.4 o Applicants who have deprived themselves of assets, to include property, savings or income will be treated as still possessing the value of the asset and will not qualify where, had the asset not been transferred, they would have had sufficient financial resources. Consideration will be given to the personal circumstances of the applicant and the length of time which has passed. Information and advice will be provided on alternative housing options. When considering this we will also consider benefit regulations with regard to deprivation of capital.	Tightening up on rules for non-qualification if the applicant has gifted, transferred, or spent assets and worsened their housing situation. Someone who has knowingly done this should not have access to social housing, and these rules follow benefit regulations and those set out for care funding.
4.4.11 Band 1	Housing Priority Bands	People with an urgent need for an adapted property	Removal of this from the priority bands as it has become confusing for residents and officers. The need for an adapted property falls within medical needs and it covered by this in the

			policy and priority bandings. (please see below regarding updates to the Medical need)
4.4.11	Housing Priority Bands	Someone needing an adapted property	Removal of this from the priority bands as it has become confusing for residents and officers. The need for an adapted property falls within medical needs and it covered by this in the policy and priority bandings. (please see below regarding updates to the Medical need)
4.4.11	Band Considerations	Band 1 will only be valid for 8 weeks. This can be extended where the applicant has not placed a bid because no suitable vacancy has arisen during that period. If the applicant does not meet the extension criteria, their priority will be reduced to Band 3 and they will be directly offered the next available property suitable to their needs. If they refuse the offer of that property, the Council will view any housing duty as having been discharged.	We are finding that those in the high band are not always using their bids and not bidding on suitable properties, meaning that they are potentially in Temporary Accommodation longer than necessary.
4.8	Deliberate or worsening of circumstances	Homeowners who have transferred their property to another family member within the last 5 years from the date they make their application to the register	Remove from this section and amend. As above we are suggesting that this is now added to the non-qualification rules.

2. Sections requiring updating or rewording to include more detail/guidance:

Section Number	Section detail	Changes required
1.1	We work with	Update list of Registered Social Landlords
2.1	Aims of the allocations scheme	Add new point <ul style="list-style-type: none"> To enable applicants to sustain their tenancy
3.1.2	Persons from Abroad	Removed paragraph starts ' <i>The rules will change from 2021..</i> ' The rules and eligibility are fully covered within the current policy
3.2	Qualification Rules	Update the employment requirements: From: <ul style="list-style-type: none"> Have a current contract of permanent employment where the job requires residency in Broadland / South Norfolk. To: <ul style="list-style-type: none"> Have a current contract of employment that is effective, within Broadland / South Norfolk. Where it is anticipated employment will last 6 months
3.2	Qualification rules	Correct typing error
3.2	Qualification rules	Update wording From: If they are residing in a supported housing project and approaching the Councils via a Move-on arrangement, they will have to have resided at the project at least 6 months before submitting an application. If the specialist provider has a move on arrangement with the Council this will provide the local connection. To If they are residing in a supported housing project <i>in the district</i> and approaching the Councils via a Move-on arrangement, they will have to have resided at the project at least 6 months before submitting an application. If the specialist provider has a move on arrangement with the Council this will provide the local connection.

3.2	Qualification Rules	<p>Move-on from supported accommodation <i>Are living in accommodation-based support services outside the district to which they were referred by or with the agreement of the Council and they lived in Broadland for 6 months immediately prior to the placement.</i></p> <p>Update wording to: <i>Are living in accommodation-based support services outside the district to which they were referred by or with the agreement of the Council and they met the qualification criteria immediately before the placement.</i></p>
3.4f	Non-Qualification rules	<p>Update wording to add mortgage arrears section:</p> <p>From:</p> <ul style="list-style-type: none"> They, or a member of their household, is/was responsible for paying rent and they have rent arrears and/or court costs greater than 16 weeks rent if the rent is charged weekly or greater than 4 months if the rent is charged monthly and they have not met the criteria for reassessment. <p>To:</p> <ul style="list-style-type: none"> They, or a member of their household is/was responsible for paying rent or a mortgage and they have rent or mortgage arrears and/or court costs greater than 16 weeks if charged weekly or greater than 4 months if charged monthly and they have not met the criteria for reassessment.
3.4 l	Non- Qualification rules	<p>Update wording to add household:</p> <p>From:</p> <ul style="list-style-type: none"> Applicants who are considered to have sufficient financial resources to secure accommodation within the private sector <p>To:</p> <ul style="list-style-type: none"> Applicants and their household who are considered to have sufficient financial resources to secure accommodation within the private sector.
3.4 l	Non-Qualification rules	<p>Update wording to include income:</p> <p>From:</p> <ul style="list-style-type: none"> 'Sufficient financial resources' includes any assets or investments even if they are not immediately available to the applicant, such as any residential or non-residential property that they own, or part own anywhere in the UK or abroad. <p>To:</p> <ul style="list-style-type: none"> 'Sufficient financial resources' includes any income, assets or investments even if they are not immediately available to the applicant, such as any residential or non-residential property that they own, or part own anywhere in the UK or abroad.

4.3.1	Proof required	Move section so the policy reads and flows better to before section 4.3 verification
4.4.6 f	Priority on health grounds	<p>Update wording to remove unreasonable:</p> <p>From:</p> <ul style="list-style-type: none"> you, or someone in your household, has either a permanent and substantial disability, or a severe long term limiting illness, or the severest form of learning disabilities or behaviour problems and it is unreasonable for you to share a bedroom as it would seriously affect the sleep of those you would normally share with, to the severe detriment of their or your health <p>To:</p> <ul style="list-style-type: none"> you, or someone in your household, has either a permanent and substantial disability, or a severe long term limiting illness, or the severest form of learning disabilities or behaviour problems and for you to share a bedroom with that person would seriously affect the sleep of those you would normally share with, to the severe detriment of their or your health
4.4.6 f	Priority on health grounds	<p>Update wording to essential health treatment</p> <p>From:</p> <ul style="list-style-type: none"> you are having health treatment at home that needs large machinery or a stock of health supplies to be stored e.g., you are having renal dialysis at home <p>To:</p> <ul style="list-style-type: none"> you are having essential health treatment at home that needs large machinery or a stock of health supplies to be stored e.g. you are having renal dialysis at home
4.4.6 g	Priority on health grounds	<p>Remove category A or B:</p> <p>An additional recommendation that can be made is that an applicant must have ground floor on health or disability grounds or must have a ground floor property that is wheelchair accessible. category A or B</p>
4.4.8	Move on	Add list of supported move on accommodation providers to the section
4.4.9	Elected Members or Employees and Close relatives	Add close relatives to the list as this is currently missing: Close relatives: The application will be assessed by a relevant senior officer or manager of the council. The award of priority (housing band) must be authorised by the Council's Director with the responsibility for housing.
4.4.11	Housing Priority Bands	Change band names from Band 1 Band 2 Band 3

		<p>Band 4</p> <p>To</p> <p>Emergency Band</p> <p>Band 1</p> <p>Band 2</p> <p>Band 3</p>
4.4.11 (Band1)	Housing Priority Bands	<p>People with an urgent medical need Inc. hospital discharge update wording for more clarification and to include adapted properties</p> <p>From:</p> <ul style="list-style-type: none"> • People with an urgent medical need inc. hospital discharge • People with an urgent need for an adapted property <p>To:</p> <ul style="list-style-type: none"> • People with an urgent medical need being discharged from medical care, who are unable to return home. People with a serious medical need who are unable to be discharged home from medical care due to their changed accommodation need. This may include access to an adapted property.
4.4.11 (Band 1)	Housing Priority Bands	<p>s193 Duty and in TA/s189 Relief Duty, update wording to:</p> <p>From:</p> <ul style="list-style-type: none"> • S193 Duty and in TA/s189 Relief Duty <p>To:</p> <ul style="list-style-type: none"> • A homeless applicant who is either owed a s193 Duty and is currently living in temporary accommodation or who is owed a s189b Duty, have been placed in interim accommodation and is not likely to be assessed as intentionally homeless.
4.4.11 (Band 2)	High Medical Need	Add note to see Band Considerations
4.4.11 (Band 2)	High Welfare need	Add note to see Band Considerations
4.4.11 (Band 2)	Housing Priority Bands	<p>Update wording</p> <p>From:</p> <ul style="list-style-type: none"> • Threatened with Homelessness and in Priority Need (next 12 weeks) <p>To:</p>

		<ul style="list-style-type: none"> An applicant in priority need who is either homeless or threatened with homelessness within the next 12 weeks and who is not likely to be assessed as intentionally homeless.
4.4.11 (Band 2)	Housing Priority Bands	<p>Tenant under-occupying by 1 or more update to advise that they need to be living within the district:</p> <p>From:</p> <ul style="list-style-type: none"> Tenant under-occupying by 1 or more bedrooms (current property unaffordable) <p>To:</p> <ul style="list-style-type: none"> Tenant in social housing, within the Broadland or South Norfolk district under-occupying by 1 or more bedrooms (current property unaffordable)
4.4.11 (Band 2)	Housing Priority Bands	<p>Update wording to remove affordability test as it is not required in this circumstance:</p> <p>Overcrowded by 2 or more bedrooms (affordability test)</p>
4.4.11 (Band 2)	Housing Priority Bands	<p>Disrepair/Unsafe Home/Lacking essential amenities</p> <p>Add note to definition of this:</p> <p>*Essential amenities Means applicants living in homes lacking: : A kitchen (or cooking facilities)*, a bathroom, an inside WC, running water, or electricity. Disrepair/Unsafe Home A property assessed by the Council's Housing Standards department under the Housing Health and Safety Rating System and considered eligible for formal enforcement through either Improvement , Prohibition, Emergency Prohibition and Hazard Awareness Notices (including Suspended, Improvement and Prohibition Notices)</p>
4.4.11 (Band 3)	Housing Priority Bands	<p>Update wording:</p> <p>From:</p> <ul style="list-style-type: none"> Homeless (no priority need) or Threatened with homelessness (next 12 weeks)(No priority need) – update to <p>To:</p> <ul style="list-style-type: none"> An applicant who is either homeless or threatened with homelessness within the next 12 weeks who is assessed as having no priority need
4.4.11 (Band 3)	Housing Priority Bands	<p>Medium Medical Need</p> <p>Add note to see Band Considerations</p>
4.4.11 (Band 3)	Housing Priority Bands	<p>Medium Welfare Need</p> <p>Add note to see Band Considerations</p>

4.4.11 (Band 3)	Housing Priority Bands	<p>Intentionally homeless update:</p> <p>From:</p> <ul style="list-style-type: none"> • Intentionally Homeless <p>To:</p> <ul style="list-style-type: none"> • An applicant who has been assessed as Intentionally Homeless •
4.4.11 (Band 3)	Housing Priority Bands	<p>Tenant under-occupying by 1 or more bedrooms update:</p> <p>From:</p> <ul style="list-style-type: none"> • Tenant under-occupying by 1 or more bedrooms (current property affordable) <p>To:</p> <ul style="list-style-type: none"> • Tenant in social housing, within the Broadland or South Norfolk district under-occupying by 1 or more bedrooms (current property affordable)
4.4.11 (Band 3)	Housing Priority Bands	<p>move on update:</p> <p>From:</p> <ul style="list-style-type: none"> • Move-on <p>To:</p> <ul style="list-style-type: none"> • Assessed as ready to move on from supported accommodation
4.4.11 (Band 3)	Housing Priority Bands	<p>Two existing socially rented households moving into one property update:</p> <p>From:</p> <ul style="list-style-type: none"> • Two existing socially rented households moving into one property <p>To:</p> <ul style="list-style-type: none"> • Two existing socially rented households moving into one property, where at least one of the properties is in Broadland or South Norfolk Districts
4.4.11	Band Considerations	<p>Add Welfare need to band considerations</p> <p>Priority on welfare needs will only be awarded after an assessment confirms that a change of accommodation could reasonably be expected to alleviate the problem.</p> <p>A high welfare need will be awarded where there is an urgent need to move as the circumstance is having a severe impact on the household's wellbeing or where there may be an imminent risk of future homelessness.</p> <p>A medium welfare need will be awarded where the need to move is not urgent, but the circumstance is causing the applicant significant problems and is substantially affecting their wellbeing. Applicants may be provided with additional information and advice relating to their welfare need and may be signposted to appropriate agencies and services which provide specialist support. A welfare need may include, but is not limited to financial difficulties, anti-social</p>

		behaviour, harassment, and isolation. Circumstances will need to be verified and multi-agency information sharing, and assessment may be required, but it remains the Council's decision to determine if there is a housing need and the level of priority which should be awarded.
	Band Considerations	<p>Add medical need to band considerations</p> <p><u>Priority on Health Grounds</u></p> <p>A high medical need will be awarded where the applicant or a member of their household has an urgent need to move because their accommodation is unsuitable and cannot be made suitable. An applicant will be assessed as having an urgent need to move where there is an imminent risk of health deteriorating as a result of the unsuitability of the accommodation and there is a clear expectation, supported by relevant health professionals that a change in accommodation will have a significant impact on their health and wellbeing. This includes access adapted properties.</p> <p>A Medium medical need will be awarded where the current home is causing the applicant significant problems and whilst they are managing to some extent, a change in accommodation could reasonably be expected to alleviate or significantly improve the problem. The need will be supported by relevant health professionals. This includes access adapted properties</p>
4.4.12	Determination of Effective Band Date	<p>Update wording on statutory homeless bullet point:</p> <p>From:</p> <ul style="list-style-type: none"> If you are statutory homeless, the effective band date will be the date we accepted a statutory duty under the homeless legislation. <p>To:</p> <ul style="list-style-type: none"> If you are statutory homeless, the effective band date will be the date in which, through our investigations, you were deemed as actually homeless.
4.4.13	Household type and property size allowed	<p>In Carer household update wording to include overnight:</p> <p>From:</p> <ul style="list-style-type: none"> A bedroom will be allocated if the carer needs to reside in the property and is not already part of the permanent household <p>To:</p> <ul style="list-style-type: none"> A bedroom will be allocated if the carer needs to reside at the property overnight and is not already part of the permanent household
4.4.13	Medical	<p>Update wording:</p> <p>Property size</p>

		<p>From:</p> <ul style="list-style-type: none"> • A bedroom will be allocated if recommended as part of the medical need <p>To :</p> <ul style="list-style-type: none"> • A bedroom will be allocated if recommended and evidenced as part of the medical need <p>Conditions</p> <p>From:</p> <ul style="list-style-type: none"> • Subject to an agreed medical need where the extra room may be needed to accommodate large equipment or there are serious mobility issues. <p>To:</p> <ul style="list-style-type: none"> • Subject to an agreed and evidenced medical need where the extra room may be needed to accommodate large essential equipment or there are serious mobility issues.
4.8	Deliberate or worsening circumstances	<p>Update wording:</p> <p>From:</p> <p>Where there is evidence that an applicant has knowingly and deliberately made their housing situation worse in order to gain a higher priority on the register</p> <p>To:</p> <p>Where there is evidence that an applicant has knowingly and deliberately made their housing situation worse which could result in access to a higher priority on the register.</p> <p>Remove bullet point</p> <ul style="list-style-type: none"> • Homeowners who have transferred their property to another family member. <p>As this would be covered in the non-qualification policy change suggested.</p>
5.4.1	Offer of Accommodation	<p>Remove paragraph</p> <p>Broadland/ South Norfolk Council will: Formally notify the applicant they have been selected for a property....</p> <p>As this is completed by the registered social landlord.</p>
5.4.1 (a)	Offer of Accommodation	<p>Update wording:</p> <p>From:</p> <ul style="list-style-type: none"> • Applicants will usually be contacted within 3 working days of the closing date. <p>To:</p> <ul style="list-style-type: none"> • Applicants will usually be contacted after the closing date
5.4.1	Offer of Accommodation	<p>Update the final paragraph:</p> <p>From:</p> <p>Once the formal offer is made the status of the applicant on the Housing Register will show as 'Under Offer'</p> <p>To:</p>

		Once the formal offer is made the status of the applicant on the Housing Register will show as 'matched'
6	Complaints, Decisions and Reviews	Change layout move 6.2 complaints after 6.3.2 Statutory right of review and before 6.3.3 judicial review
6.2	Complaints, Decisions and Reviews	<p>Change complaints opening paragraph</p> <p>From:</p> <p>If an applicant is dissatisfied with any aspect of the management of their application, other than where a review can be made, they should follow the Council's published complaints procedure, available on the Council's website at https://www.southnorfolkandbroadland.gov.uk/council/compliments-suggestions-complaints or on request.</p> <p>To:</p> <ul style="list-style-type: none"> If a complaint relates to the decision of Housing application, in the first instance this will be treated as a review (see 6.3). However, if your complaint relates to the service you have received, this will be dealt with via our complaint's procedure https://www.southnorfolkandbroadland.gov.uk/council/compliments-suggestions-complaints or on request.
6.3.2 j	Complaints, Decisions and Reviews	<p>If the applicant is still not satisfied, they may appeal the decision, update:</p> <p>From:</p> <ul style="list-style-type: none"> If the applicant is still not satisfied, they may appeal the decision. See 6.4 <p>To:</p> <ul style="list-style-type: none"> If the applicant is still not satisfied with the service they have received they can make a complaint as per our complaint's procedure

3. Sections to be moved to supplementary guidance document

Section Number	Section detail	Notes and amendments
2.2	Accommodation Pathway model	All information and tables to move to supplementary guidance
2.3	Enabling the model	All information and tables to move to supplementary guidance
3.2	Evidence of a connection to Broadland/South	Move all detail of evidence to supplementary guidance

	Norfolk may be required	
3.7	Safe surrender agreement	Move final paragraph into guidance under the accommodation pathway model
4.1	The application process	Move to supplementary guidance
4.2	Submission	Move final paragraph from page 23 to supplementary guidance and update
5.1	The allocations process	All information and tables to move to supplementary guidance
5.1.1	Blended Allocations	All information and tables to move to supplementary guidance
5.1.2	Predicting Properties	All information and tables to move to supplementary guidance
5.2	Property Identification	All information to move to supplementary guidance
5.2.2	Choice Based Lettings	All information to move to supplementary guidance
5.2.5	Property Descriptions	All information to move to supplementary guidance
5.2.7	Hard to lets	All information to move to supplementary guidance
5.2.8	Sensitive lets	All information to move to supplementary guidance
5.4.3	Viewings	All information to move to supplementary guidance
5.4.4	Resulting the offer	All information and tables to move to supplementary guidance
5.4.5	Publicising Lettings	All information to move to supplementary guidance
5.5	Tenancy sustainment	All information and tables to move to supplementary guidance

Minimum Energy Efficiency Standards

Report Author(s): Kevin Philcox
Housing Standards Senior Manager
01603 430578
kevin.philcox@southnorfolkandbroadland.gov.uk

Portfolio: Better Lives

Ward(s) Affected: All

Purpose of the Report:

South Norfolk Council is developing a proactive approach to the enforcement of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015. An accountable decision approach is required regarding enforcement decisions including financial penalties for non-compliance.

Recommendations:

Cabinet to approve:

- 1 The Councils proposed enforcement procedure.
- 2 The financial penalty decision process.

1. Summary

1.1 This report supports two of the Councils key agendas:

1. As part of our commitment to deliver our environmental strategy, we are ensuring that private sector homes in South Norfolk are more efficient in their energy use thus reducing emissions.
2. Through this regulation we are supporting our vulnerable households by providing information and guidance to landlords to ensure their homes are energy efficient and using a muscular approach to tackle landlords who abuse the regulations. The more energy efficient a home is, the more affordable the cost to tenants.

1.2 From 1 April 2020, landlords should no longer let or continue to let properties if they have an EPC (Energy Performance Certificate) rating below E, unless they have a valid exemption in place. It is the responsibility of the District Council to enforce this requirement through our housing standards work but currently we have no accountable decision approach for this enforcement work and therefore could be challenged.

1.3 The Housing Standards team has recently submitted a joint bid on behalf of Broadland District and South Norfolk Councils to proactively deliver a compliance and enforcement scheme for these Regulations and have been awarded £72,000.

1.4 To complete this proactive scheme, an enforcement policy requires approval to ensure accountability and consistency to the proactive approach the scheme requires. As with all enforcement action, the Council works on a principle of education first, taking enforcement action only where necessary.

2. Background

2.1 The Domestic Minimum Energy Efficiency Standard (MEES) Regulations 2018 amends The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 by setting a minimum energy efficiency level for domestic private rented properties to support reduction in inefficient properties.

2.2 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 are designed to tackle the least energy-efficient properties in England and Wales – those rated F or G on their Energy Performance Certificate (EPC). The Regulations establish a minimum standard for both domestic and non-domestic privately rented property, effecting new tenancies from 1 April 2018. As a result, since 1 April 2020, landlords should no longer let or continue to let properties if they have an EPC (Energy Performance Certificate) rating below E, unless they have a valid exemption in place.

2.3 Exemptions include works that devalue a property as a result of the works; a wall insulation exemption where expert advice i.e. a Chartered Builder (MCIOB) / Building Surveyor (MRICS) indicates this could damage the property; exemptions

can be obtained where the Landlord(s) has not been able to secure the necessary third-party consents, despite having made reasonable efforts, however, improvement work that does not need consent, must still be carried out by the Landlord. Importantly there is also a financial cap on works required by any landlord of £3500 and once this has been spent by the landlord the property can be registered on the exemption register. Written evidence must be provided to support the exemption. Guidance is available for Landlords at <https://www.gov.uk/government/publications/non-domestic-private-rented-property-minimum-energy-efficiency-standard-landlord-guidance>.

- 2.4 The regulations do not apply to social housing, and some listed buildings are not covered by MEES Regulations.
- 2.5 The Housing Standards team has recently submitted a joint bid on behalf of Broadland District and South Norfolk Councils to help the Council deliver a compliance and enforcement scheme for these Regulations and has been awarded £72,000.
- 2.6 The team has developed an engagement programme with landlords and a proactive approach using the funding available. It is likely, because of this proactive approach, enforcement will be initiated which may involve multiple properties. Therefore, a consistent decision-making process is required regarding enforcement and possible financial penalties that may result from non-compliance.
- 2.7 Across our region, best practice has shown there is difficulty in identifying EPC (Energy Performance Certificate) of non-compliant properties. Many rental homes are in isolated rural areas for example. The finance from the bid will result in additional staff to set up and deliver an effective MEES compliance process that will identify non-compliant properties and target these landlords. Officers will then share their learning within our Housing Standards team and energy partners to ensure all lessons learnt are embedded in future processes. We shall also ensure monitoring and enforcement systems will remain in place after funding ceases. (31st March 2022).
- 2.8 The team will raise awareness of MEES Regulations through targeting advertising of landlords and letting agents. Officers will contact landlords, give advice and direct them to grants that are currently available through the various internal and external financial assistance schemes. Officers will also outline the implications of non-compliance. i.e. the financial penalty procedures that include fines up to £5000 and will use this as necessary.

3. Current position/findings

- 3.1 The Regulations are intended to ensure that those tenants who need energy efficient homes the most, particularly vulnerable people, can enjoy a better living environment and lower energy bills.
- 3.2 Local authorities are required to enforce compliance with the domestic minimum level of energy efficiency. They may check whether a property meets the minimum

level of energy efficiency and may issue a compliance notice requesting information where it appears to them that a property has been let in breach of the Regulations (or an invalid exemption has been registered in respect of it). The information requested will assist local authorities in the decision process. The compliance notice may also require the landlord to register copies of the requested information on the PRS Exemptions Register. The authority may also publish details of the breach on the national PRS Exemptions Register.

- 3.3 Where a local authority is satisfied that a property has been let in breach of the Regulations it may serve a notice on the landlord imposing financial penalties. A local authority may also serve a penalty notice for the lodging of false information on the Exemptions Register. The landlord may ask the local authority to review the penalty notice and, if the penalty is upheld on review, the landlord may then appeal the penalty notice to the first-tier Tribunal.
- 3.4 Where a property is non-compliant the authority has the discretion to decide if a financial penalty is required and the amount of the penalty, up to maximum limits set by the Regulations. The maximum penalties are as follows:
- (a) Where the landlord has let a sub-standard property in breach of the Regulations for a period of less than 3 months, the Local Authority may impose a financial penalty of up to £2,000 and may impose a publication penalty.
 - (b) Where the landlord has let a sub-standard property in breach of the regulations for three months or more, the Local Authority may impose a financial penalty of up to £4,000 and may impose a publication penalty.
 - (c) Where the landlord has registered false or misleading information on the Private Rented Sector (PRS) Exemptions Register, the Local Authority may impose a financial penalty of up to £1,000 and may impose a publication penalty.
 - (d) Where the landlord has failed to comply with compliance notice, the Local Authority may impose a financial penalty of up to £2,000 and may impose a publication penalty.
- 3.5 A publication penalty means that the enforcement authority will publish some details of the landlord's breach on a publicly accessible part of the PRS Exemptions Register. The enforcement authority can decide how long to leave the information on the Register, but it will be available for view by the public for at least 12 months.
- 3.6 A local authority may not impose a financial penalty under both paragraphs (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the total amount of the financial penalty may not be more than £5,000.

- 3.7 It is important to note that this maximum amount of £5,000 applies per property, and per breach of the Regulation. Given this, it means that, if after having been previously fined up to £5,000 for having failed to satisfy the requirements of the regulations, a landlord proceeds to unlawfully let a substandard property on a new tenancy; the local enforcement authority may again levy financial penalties up to £5,000 in relation to that new tenancy.

4. Proposed action

- 4.1 The Council will liaise with landlords of properties in breach of the regulations informally at first.
- 4.2 Where breach of the regulations cannot be resolved informally the Council will initiate the penalty process.
- 4.3 The Council will consider the severity of the breach when deciding on fine levels.
- 4.4 The Assistant Director of Individuals and Families will set the fine level in accordance with current guidance and in consultation with the portfolio holder for Better Lives. Appendix 1 details a decision process that will be used to ensure consistency and transparency. The process set out in Appendix 1 will only be a guide and each case will be treated on its own merits in consultation with legal advisors.
- 4.5 A matrix system is a common process used to help engage the target cohort in enforcement. By being clear that the more impact your action has on others, and the more you deliberately show disregard to your responsibly, the higher the penalty you will receive. This acts as an incentive to engage with the Council.

5. Other options

- 5.1 No other options are suggested

6. Issues and risks

6.1 Resource Implications

The proactive procedure detailed in this report that the authority has initiated is externally funded. The Housing Standards team currently initiates reactive inspections of properties in the Private Rented Sector following a complaint from a tenant. Post inspection, the appropriate enforcement procedure will include the possibility of using these regulations as part of a tool kit, this approach will limit the potential impact on future resources.

- 6.2 Legal Implications** - Legal assistance may be required regarding the imposition of financial penalties for example an appeals procedure as result of a fine. Therefore, it is possible that legal advice would be sought prior to any financial penalty action initiated in accordance with Appendix 1.
- 6.3 Equality Implications** – The enforcement approach is not expected to impact any protected characteristic group
- 6.4 Environmental Impact** – The progression of enforcement that result in the energy demand of residential dwellings will reduce carbon and therefore be of environmental benefit
- 6.5 Crime and Disorder** – Operating a property as rented dwelling with an EPC below E is an offence. As such the procedure addresses the offenses including any mitigating circumstances that may be of consideration.
- 6.6 Risks** – Without an approved policy the financial penalty procedure is at an increased risk of challenge.

7. Conclusion

- 7.1** This report proposes accountable procedures to move forward with an active proactive procedure of enforcement of the Minimum Energy Efficiency requirements in the private rental sector to ensure compliance with current legislation, support our environmental strategy and help our vulnerable residents through providing warm homes.

8. Recommendations

Committee/Cabinet to agree to

- 1 Approve the Councils proposed enforcement procedure.
- 2 Approve the financial penalty decision process.

Background papers

None

Appendix 1

The Following Factors will be considered when setting the financial penalty levels

- The seriousness of the offence, determined by harm caused and culpability of the offender
- The history of compliance of the offender
- The punishment of the offender for the offence
- Deterring the offender from repeating the offence
- Deterring others from committing similar offences
- Removing any financial benefit obtained from committing the offence

The approach is based on the Magistrates' Court Sentencing Guidelines issued by the Sentencing Council. Accordingly, an assessment of culpability and harm will be carried out in order to determine the appropriate level of penalty in each case.

Harm

Harm will be assessed as either high, medium or low.

In determining the level of harm the Local Housing Authority will have regard to:

- The individual/s affected i.e. damage to health, psychological distress.
- The current condition of the property
- The number of residents affected by the breach
- The vulnerability of the resident

Culpability

In determining culpability, the Local Housing Authority will have regard to four levels of culpability.

Where the offender:

- Has the **intention** to breach the requirement.
- Is **reckless** as to whether harm is caused by the breach
- Has **knowledge** of the legislation and does not intend to take action.
- Is guilty of **negligence**

Considering the above, culpability will be assessed as either very high, high, medium or low.

Determining the Amount of the Financial Penalty

The table below sets out the interrelation between harm and culpability as a determinant of the financial penalty, banding the fine amount is a percentage of the total cap of fine as detailed in Para 3.4 and 3.6 of this report.

Harm	Culpability			
	Very high	High	Medium	Low
High	100%	80%	60%	40%
Medium	80%	60%	40%	20%
Low	70%	50%	30%	10%

Aggravating/Mitigating Factors

The penalty may be increased or decreased from the centre starting point within the band to the maximum or minimum level in the band. Considerations affecting this decision are detailed in the table below:

Full co-operation following identification of offence	Reduce from starting
Minimal further input required by the council to achieve compliance	No adjustment
Significant involvement by the council required to achieve compliance	Increment increase
A significant lack of co-operation and/or obstruction leading to significant further enforcement activity (e.g. works in default)	Further incremental increase

In cases where more than one penalty has been imposed, the Local Housing Authority will apply the “Totality Principle” in order to ensure that the penalty or penalties imposed are a proper reflection of all of the offending behaviour and are just and proportionate in all the circumstances.

Report of the Chairman of Scrutiny Committee

Report Author(s): Emma Goddard
Senior Governance Officer
01508 533943
Emma.goddard@southnorfolkandbroadland.gov.uk

Portfolio: Stronger Communities

Ward(s) Affected: All

Purpose of the Report:

To make Scrutiny Committee recommendations to the Cabinet regarding the Member-Led Grants.

Recommendations:

1. The Member-Led Grant Rules be amended to allow all underspend to be rolled over into the next financial year's Community Action Fund budget.

1 SUMMARY

- 1.1 In line with the Member-Led Grant Rules, the Scrutiny Committee reviewed the member grant awards and the outcomes of this spend at its meeting on 8 December 2021. Members considered compliance with the ground rules, with a view to ensuring that monies are spent effectively and in line with corporate priorities.

2 CURRENT POSITION/FINDINGS

- 2.1 Whilst undertaking their review of spend, the Committee noted the underspend, which at the time of the meeting was £24,500. Members were disappointed that there was still much to spend and were hopeful that with the assistance of the Communities Team, that members would be able to commit some of the budget by the deadline of 31 December 2021.
- 2.2 However, the Committee was mindful of the Ground Rules, particularly paragraph 3.4: *If more than £10,000 is left in the budget then money will be rolled over into a CAF Panel, if less than £10,000 then will be put into savings.*
- 2.3 The Committee was keen to ensure that any uncommitted funding was not lost. They considered the option of rolling over funding less £10,000 into the Community Action Fund (CAF) Panel, however were advised of the additional cost if an additional CAF Panel meeting was needed and concluded that the most cost-effective option would be to roll over any underspend into the following year's CAF budget.

3 PROPOSED ACTION

- 3.1 The Scrutiny Committee resolved to recommend to Cabinet that the Member-Led Grant Rules be amended to allow all underspend to be rolled over into the next financial year's Community Action Fund budget.

4 OTHER OPTIONS

- 4.1 Cabinet could choose to not support this recommendation and retain current the Rules regarding underspend.

5 ISSUES AND RISKS

- 5.1 **Resource Implications** – none – the funding is already allocated and would simply be rolled over to the next financial year.
- 5.2 **Legal Implications** – none
- 5.3 **Equality Implications** – none

5.4 **Environmental Impact** – none

5.5 **Crime and Disorder** – none

5.6 **Risks** – none

6 RECOMMENDATIONS

1. The Member-Led Grant Rules be amended to allow all underspend to be rolled over into the next financial year's Community Action Fund budget.

Background Papers

<https://www.southnorfolkandbroadland.gov.uk/downloads/file/1491/members-ward-ground-rules>

Review of Environmental Enforcement Penalties

Report Author(s): Nick Howard
Assistant Director Regulatory
01524 533787
nick.howard@southnorfolkandbroadland.gov.uk

Portfolio: Clean and Safe Environment

Ward(s) Affected: All wards

Purpose of the Report:

To determine the amounts of fixed penalty notice charges for specified environmental and anti-social behaviour offences (full charge levels and early payment reduced charge levels).

Recommendations:

1. Cabinet to agree the setting of fixed penalty notice charge levels for specified environmental and anti-social behaviour offences as proposed in Appendix 1.
2. Cabinet to agree that the proceeds of paid fixed penalty notice charges be reinvested in the respective service area's revenue expenditure budgets to support further service delivery.

1. Summary

- 1.1 The council as a regulatory authority has arrangements in place for enforcement by way of serving fixed penalty notices (FPNs) to deal with specific offences stipulated in current legislation. This report addresses offences of an environmental and/or anti-social behaviour nature which are enforced primarily by the council's Regulatory services and Community Protection team.

- 1.2 This report proposes decisions to review and update the amounts of FPN charges for specified environmental and anti-social behaviour offences, both the full amount of charges and (where permissible in law) early payment reduced charges which are conducive to good enforcement outcomes.
- 1.3 The types of FPN charge covered by this report, and the current and proposed penalty charge levels, are set out in Appendix 1 with reference to the prevailing legal provisions. In most cases, the council has discretion to offer a reduction in the amount charged if early payment is made within a set numbers of days that vary accordingly between areas of legislation. In some cases, individual legislation has provided a default level of FPN charge which, if locally acceptable, renders it unnecessary for a local authority to make new penalty charge-setting decisions each time new or updated legislation commences.

2. Background

- 2.1 Dog fouling, littering, fly-tipping and associated environmental and anti-social behaviour offences victimise our residents, blight communities and impose avoidable costs on the public purse. They also undermine the actions of legitimate residents and businesses, where unscrupulous and irresponsible operators avoid paying legitimate waste disposal costs and so undercut those that operate within the law.
- 2.2 FPN enforcement is provided in a range of legislation. UK government (through Defra) recognises that increasing the level of fixed penalties may create the public perception that fixed penalties could be used to generate income for councils. Some primary legislation, such as Part 2 of the Environmental Protection Act 1990 (Waste on Land), provides that the income received by local authorities from FPNs can only be used in relation to the same matters that are subject to the enforcement controls.

Key legislative and policy provisions

- 2.3 The Anti-social Behaviour, Crime and Policing Act 2014 introduced both Public Space Protection Orders (such as the council's which covers dog fouling) and Community Protection Notice, and the power to enforce these by way of FPNs. Community Protection Notices (CPNs) are aimed to prevent an individual's or business's unreasonable behaviour that is having a negative impact on the local community's quality of life. The CPN will require the behaviour to stop and may include reasonable conditions or positive requirements to ensure they are not repeated in the future. To date they have been used by the council for neighbour problems and for failing to store and dispose of wastes correctly.
- 2.4 The Deregulation Act 2015 contained decriminalisation provisions and introduced a three-stage process for enforcing household waste offences under Section 46A of the Environmental Protection Act 1990. This revised process involves a written warning, followed where necessary by a notice of intent, before (if an offender still persists) a final notice can be issued containing a fixed penalty charge. The penalty for an offence relating to domestic waste receptacles is now a maximum amount of £80. Offences involving household waste receptacles can cause

amenity issues, obstruction to pedestrians or traffic, or they render originators of wastes more likely to commit offences such as fly-tipping. Defra in policy guidance to local authorities advocates particular care to avoid excessive use of FPNs in relation to household waste receptacles.

- 2.5 On 1st April 2018 the Environmental Offences (Fixed Penalties) (England) Regulations 2017 came into effect. This change in legislation gave local authorities the ability to raise FPNs from the current levels to a new maximum (which varies depending on the offence), with a reduction for early payment. This is subject to the discretion of the local authority. Prior to the 2017 Regulations, the levels for fixed penalties for commercial waste receptacles, flyposting and graffiti had not changed since 2006 and were out of line with inflation and practice in other parts of the UK.
- 2.6 The 2017 Regulations also revised FPN levels for community protection notices under the Anti-social Behaviour, Crime and Policing Act 2014 and the revised FPN levels for domestic waste offences as amended by the Deregulation Act 2015.
- 2.7 FPNs are not appropriate for repeat offenders or those responsible for large-scale environmental offences, for offences involving hazardous waste, or for dealing with people who are determinedly non-compliant or do not wish to be issued an FPN. These types of offences and offenders will continue to be subject to enforcement going directly to prosecution.

Fixed penalty notice enforcement and charge levels

- 2.8 Enforcement is founded on community awareness-raising and education to prevent unknowing or neglectful offending. To further discourage and minimise offending, efficient and effective FPN enforcement can be offered. FPN enforcement avoids unnecessarily lengthy, costly and criminalising prosecutions in the magistrate's court. Decisions to issue fixed penalties are delegated to experienced enforcement officers with appropriate training and direction to ensure fairness and consistency.
- 2.9 The council's present FPN charge levels and arrangements date from various times. The review completed and updating as proposed will helpfully reflect practical enforcement experience, changes in legislation, and public concern about local offending such as fly tipping and anti-social neighbours. This is also a good opportunity to take account of a Defra review of fixed penalty enforcement in 2017. (Background document: Defra review 2017)
- 2.10 The purpose of fixed penalty notice enforcement is to secure efficient, timely and decriminalised ways of addressing and dealing with offenders with the right balance of offender correction and broader deterrent effect. The formal alternative to fixed penalty enforcement is normally to prosecute in the Magistrates Court. Prosecution inevitably involves more resource-intensive and costly prosecution file building, and delays in the legal process. Prosecution can also offer less swift and direct reassurance to local communities having witnessed the offending when compared to rapid issuing of fixed penalties. There is no formal appeal against a fixed penalty notice, instead a person served with a fixed penalty notice may elect

not to pay and the local authority will then take a decision whether to prosecute for the offence.

- 2.11 In many but not all instances, the council has some discretion in setting fixed penalty charges between a legislated or legal process determined minimum and maximum range. In some cases, a default level of fixed penalty charge is provided so that local authorities can institute fixed penalty notice enforcement without a requirement for formal decision-making as to the level of charge. A reduced charge can be made for early payment of a fixed penalty where the relevant legislation permits this.
- 2.12 If a fixed penalty charge is set too low, it may fail to have the desired deterrent effect. If it is set too high, compared to the likely fine that a magistrate's court would impose in the event of prosecution, then a person served with a fixed penalty is less likely to pay a fixed penalty and more likely to leave the council to institute a more costly and cumbersome prosecution.
- 2.13 The council's existing FPN charge level(s) for specified offences are listed in Appendix 1.

3. Current position/findings

- 3.1 A review has been completed of the different types of FPN charge for environmental and anti-social behaviour offences that the council is likely to consider using in local enforcement. The council's existing levels of FPN charges have been reviewed against the legal minimum, default, and maximum level that can be imposed as provided in each area of legislation and judicial practice. Similarly, the council's existing levels of early payment reduction in fixed penalty charges have been reviewed. These are listed in Appendix 1.
- 3.2 Key FPN enforcement policy considerations have been considered by the portfolio holder for Clean and Safe Environment and the Economy and Environment Policy Committee to assist the consideration of suggested approaches relating to areas of fixed penalty notice enforcement. The general view favoured robust enforcement for environmental and anti-social behaviour offences. Specific policy matters, such as the circumstances when a FPN will or will not be offered, and minimum ages for recipients of FPNs, will be brought forward in a subsequent report about the council's regulatory enforcement policy.
- 3.3 Whilst the Economy and Environment Policy Committee considered whether the maximum legally permissible levels of FPN charges should be preferred, its general view favoured the proposals contained in Appendix 1. Where any proposed FPN charge differs from the existing level, this is indicated in bold text.
- 3.4 The council's professional and enforcement officer experiences have been taken into account to inform members, based on local experience, of what may be the most helpful approach and advice when members consider the review of environmental and anti-social behaviour FPN charges. These practitioner experiences were reflected in the proposals considered by the policy panel.

4. Proposed action

- 4.1 South Norfolk and Broadland districts bear witness to similar profiles of environmental and anti-social behaviour offending, and the respective policy views on enforcement are similar. In view of these factors, the two councils' collaboration and shared single service delivery structure across the two districts, the proposals as presented offer a common set of fixed penalty charges. This reflects the broadly similar circumstances of offending in each district, the services' dealings with offenders and their impacts, and the desired corrective and deterrent effects.
- 4.2 The review has provided for reaffirmation and changes in FPN charges as proposed in Appendix 1 to reflect:
- a) Updating the council's decisions about setting levels for these fixed penalty charges to support robust engagement and enforcement with offenders.
 - b) Setting updated fixed penalty full charges at no less than existing levels (which are in some cases the legal default), or at increased levels.
 - c) Setting reduced penalty charges for early payment (where permitted by law) to maximise the decriminalised resolution of offending behaviours. Early payment reductions proposed for offences primarily committed by residents are typically in the order of 40% (less for fly-tipping which is costly to clear up). Early payment reductions proposed for offences primarily committed in the course of a trade or business are typically in the order of 20%. A pragmatic view of practical experience, informed by existing charge levels, has been taken in reaching the specific proposals in each case.
 - d) Pragmatic alignment between South Norfolk Council and Broadland District Council on the agreement of updated fixed penalty charges given the common positions in both districts and the single service structure for enforcement delivery, assuming that both councils agree the same charge levels.
- 4.3 There has been an increase in environmental and anti-social behaviour fixed penalty enforcement of late and officers expect to make use good use of FPN enforcement powers in the future. In line with Defra guidance, it is proposed that the proceeds of paid FPN charges are reinvested in the respective service area's revenue expenditure budgets to support further service delivery.

5. Other options

- 5.1 Members could choose to make no change to existing full and early payment FPN charge levels or could choose to set revised penalty charges at different levels to those proposed in this report.

6. Issues and risks

- 6.1 **Resource Implications** – The proposals take forward existing areas of FPN enforcement at no change in cost to the council and with no significant budget

implications. The reinvestment of paid penalty charges, which are not expected to total significant amounts, into service budgets would help to support future investigation/enforcement.

- 6.2 **Legal Implications** – Given the nature of the proposals, routine legal advice has been obtained and is reflected in this report. Were any different penalty charge levels to those proposed in Appendix 1 to be agreed, then it should be noted that lower charges may fail to deter offending (and ultimately could require greater resources to investigate and enforce), whilst higher charges may encourage more offenders to decide not to pay fixed penalties and instead require prosecution at greater cost. Otherwise, the review and updating of FPN charges within permissible ranges and as proposed carries no significant legal implications.
- 6.3 **Equality Implications** – Environmental and anti-social behaviour offending and enforcement by way of FPN charges does not impact differently on individuals/groups on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion/belief, sex or sexual orientation. No equality implications have been identified. It should be noted, however, that offenders on low incomes may have difficulty cooperating with fixed penalty enforcement if unable to pay, and this will be considered in a subsequent report on regulatory enforcement policy. The present proposals simply address the levels at which fixed penalty charges are set.
- 6.4 **Environmental Impact** – Enforcement by way of FPNs at the levels proposed in this report has a positive environmental impact as it provides for dealing efficiently and successfully with offenders and deterring offending.
- 6.5 **Crime and Disorder** – Enforcement by way of FPNs at the levels proposed in this report has a positive impact on crime and disorder, both in dealing efficiently and successfully with offenders and deterring offending, and in offering reassurance to local communities impacted by offending.
- 6.6 **Risks** – Local setting of FPN levels as proposed in this report will, as described, benefit communities in South Norfolk and Broadland although the fixed penalty levels will, in places, differ from other councils in Norfolk. Setting the right charge levels locally is proposed as being more beneficial than seeking consistency of charges with other local authorities, each of which will have set individual charges for their own reasons. It would require a substantial piece of work to map all prevailing penalty charges across Norfolk and, ultimately, the outcome would be unlikely to assist local decision-making greatly. Occasionally, an unwritten consistency on individual FPNs may have been discussed at officer level between councils in Norfolk however no relevant formal decisions have been taken between councils.

7. Conclusion

- 7.1 The proposed FPN charge levels for environmental and anti-social behaviour offending as presented in this report offer a sound review and updating, in the

interests of desirable enforcement outcomes and the drive to prevent and minimise offending.

- 7.2 If agreement is reached on a common set of FPN charge levels between South Norfolk Council and Broadland District Council, this will suitably reflect the broadly similar circumstances of offending in each district, the services' dealings with offenders and their impacts, and the desired corrective and deterrent effects.

8. Recommendations

8.1 The recommendations are:

1. Cabinet to agree the setting of fixed penalty notice charge levels for specified environmental and anti-social behaviour offences as proposed in Appendix 1.
2. Cabinet to agree that the proceeds of paid fixed penalty notice charges be reinvested in the respective service area's revenue expenditure budgets to support further service delivery.

Background papers

Defra [Policy paper: Guidance for local authorities on household waste duty of care fixed penalty notices](#), updated 11th December 2018.

The Anti-social Behaviour, Crime and Policing Act 2014.

The Deregulation Act 2015.

The Environmental Offences (Fixed Penalties) (England) Regulations 2017.

Appendix 1

Existing and proposed fixed penalty charges for environmental / anti-social behaviour offences (South Norfolk Council)

Offence	Legislation	Existing FULL penalty amount	Proposed FULL penalty amount	Existing REDUCED early payment penalty amount if paid within 10 working days	Proposed REDUCED early payment penalty amount if paid within 10 working days	Maximum / minimum / permitted and default (if any) penalty	Maximum penalty on conviction (if a fixed penalty charge has not been offered, or goes unpaid)
Littering *	Environmental Protection Act 1990 Sections 87-88	£80	£100 <i>an increase of £20</i>	£60	£60 <i>no change</i>	Maximum: £150 Minimum: £50 Default: £100	£2,500 Level 4
Graffiti *	Anti-social Behaviour Act 2003 Section 43	The primary enforcement provision has changed	£100	The primary enforcement provision has changed	£60	Statutory Range £50-150 Minimum: £50 Default: £100	£2,500 Level 4
Flyposting *	<i>(Previously Town & Country Planning Act 1990 Section 224)</i> Anti-social Behaviour Act 2003 Section 43	<i>(£80)</i> The primary enforcement provision has changed	£100	<i>(£60)</i> The primary enforcement provision has changed	£60	<i>(£100)</i> Statutory Range £50-150 Minimum: £50 Default: £100	 £2,500 Level 4
Unauthorised distribution of free literature on designated land	Environmental Protection Act 1990 Section 88	Requires confirmed charge setting now	£100	Requires confirmed charge setting now	£60	Statutory range £50 to £150 Minimum: £50 Default: £100	£2,500 Level 4
Alarm Noise: failure to nominate key holder or to notify local authority of keyholder details	Clean Neighbourhoods and Environment Act 2005 Section 73	Requires confirmed charge setting now	£75	Requires confirmed charge setting now	£50	Statutory range £50 to £80 Minimum: £50 Default: £75	

Offence	Legislation	Existing FULL penalty amount	Proposed FULL penalty amount	Existing REDUCED early payment penalty amount if paid within 10 working days	Proposed REDUCED early payment penalty amount if paid within 10 working days	Maximum / minimum / permitted and default (if any) penalty	Maximum penalty on conviction (if a fixed penalty charge has not been offered, or goes unpaid)
Abandoning a vehicle	<i>(Previously Refuse Disposal (Amenity) Act 1978 Sections 2 and 2A)</i> Clean Neighbourhoods and Environment Act 2005 Section 10	£200	£200 <i>no change</i>	£150	£150 <i>no change</i>	Statutory range £200 Minimum: £120 Default: £200	£2,500 Level 4 and/or 3 months imprisonment
Fly-tipping	Environmental Protection Act 1990 Section 33(1)(a)	£200	£300 <i>an increase of £100</i>	No reduction for early payment previously offered	£230	Statutory range £150 - £400 Minimum: £120 Default: £200	£50,000 and/or 5 years imprisonment
Household waste duty of care	Environmental Protection Act 1990 Section 34(2A)	£200	£200 <i>no change</i>	No reduction for early payment previously offered	£150	Statutory range £150 - £400 Minimum: £120 Default: £200	£5,000 at Magistrates' Court or unlimited fine at Crown Court
Failure to produce waste transfer note	Environmental Protection Act 1990 Section 34A	£300	£300 <i>no change</i>	£225	£230 <i>an increase of £5</i>	Statutory range £300 Minimum: £180 Default: £300	£5,000 at Magistrates' Court or unlimited fine at Crown Court
Failure to produce documentation (waste carriers' licence)	Environmental Protection Act Section 34A	£300	£300 <i>no change</i>	£225	£230 <i>an increase of £5</i>	Statutory range £300 Minimum: £180 Default: £300	£5,000 Level 5 or on indictment an unlimited fine
Domestic, Industrial and commercial waste receptacle offences	Environmental Protection Act 1990 Sections 34, 36 or 47(2A)	£80	£80 <i>no change</i>	£60	£60 <i>no change</i>	Statutory range £75 - £110 Minimum: £60 Default: £100	£1,000 Level 3

Offence	Legislation	Existing FULL penalty amount	Proposed FULL penalty amount	Existing REDUCED early payment penalty amount if paid within 10 working days	Proposed REDUCED early payment penalty amount if paid within 10 working days	Maximum / minimum / permitted and default (if any) penalty	Maximum penalty on conviction (if a fixed penalty charge has not been offered, or goes unpaid)
Noise exceeding permitted level – domestic premises	Noise Act 1996 Section 8a(2)(a) & (b) As amended by the Clean Neighbourhoods & Environment Act 2005 And the Anti-social Behaviour Act 2003	£80	£100 <i>an increase of £20</i>	£60	£60 <i>no change</i>	Statutory range £75 - £110 Minimum: £60 Default: £100	£1,000 Level 3
Noise exceeding permitted level – licensed premises	Noise Act 1996 Section 8A(2A) As amended by the Clean Neighbourhoods & Environment Act 2005 And the Anti-social Behaviour Act 2003	£500	£500 <i>no change</i>	£375	Remove existing reduction (because no early payment reduction is permitted)	Statutory range £500 No discount permitted Default: £500	£5,000 Level 5
Breach of Public Space Protection Order (includes dog fouling)	Anti-social Behaviour, Crime & Policing Act 2014 Section 68	£80	£100 <i>an increase of £20</i>	£60	£60 <i>no change</i>	Statutory range up to £100 No statutory minimum	Up to Level 3 fine, (or Level 2 for breach of alcohol prohibition)
Repairing a vehicle on the road	Clean Neighbourhoods & Environment Act 2005 Section 4	£100	£100 <i>no change</i>	£80	£80 <i>no change</i>		£2,500 Level 4
Exposing vehicles for sale on a road	Clean Neighbourhoods & Environment Act 2005 Section 3	£100	£100 <i>no change</i>	£80	£80 <i>no change</i>		£2,500 Level 4
Breach of Community Protection Notice	Anti-social Behaviour, Crime & Policing Act 2014 Section 52	£80	£100 <i>no change</i>	£60	£60 <i>no change</i>	Statutory range up to £100 No statutory minimum	Up to Level 4 fine, plus, costs of remedial work & forfeiture or seizure of items

Offence	Legislation	Existing FULL penalty amount	Proposed FULL penalty amount	Existing REDUCED early payment penalty amount if paid within 10 working days	Proposed REDUCED early payment penalty amount if paid within 10 working days	Maximum / minimum / permitted and default (if any) penalty	Maximum penalty on conviction (if a fixed penalty charge has not been offered, or goes unpaid)
Failure to comply with Litter Clearance Notice	Environmental Protection Act 1990 Sect 92 (A/C), 94	£80	£100 <i>an increase of £20</i>	£60	£60 <i>no change</i>		£2,500 Level 4

* A Community Protection Notice may be issued as an alternative method of enforcement where offences in the first column are marked with an asterisk.

STARSTON NEIGHBOURHOOD PLAN SUBMISSION

Report Author(s): Richard Squires
Senior Community Planning Officer
01603 430637
richard.squires@broadland.gov.uk

Portfolio: External Affairs and Policy; Stronger Economy

Ward(s) Affected: Starston

Purpose of the Report:

Starston Parish Council has submitted its proposed Neighbourhood Plan, along with necessary supporting information to South Norfolk Council. The purpose of this report is to agree to take the proposed Plan through to the next stages of consultation and independent examination.

Recommendations:

It is proposed that Cabinet agree:

1. That the submitted Starston Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
3. That the proposed South Norfolk Council response, as detailed in Appendix 2, is formally submitted as part of the Regulation 16 consultation.

1 SUMMARY

- 1.1 Starston Parish Council submitted its proposed Neighbourhood Plan, along with necessary supporting information to South Norfolk Council in late November 2021. The purpose of this report is to agree to take the proposed Plan through to the next stages of consultation and independent examination.

2 BACKGROUND

- 2.1 Startson Parish Council, as the appropriate Qualifying Body, applied to South Norfolk Council in July 2018 to designate a Neighbourhood Area for the purpose of producing a Neighbourhood Plan.
- 2.2 Since that time, the local planning authority has supported the appointed Neighbourhood Plan steering group in terms of funding, professional advice and guidance from officers, and other forms of practical support. The process of producing the Plan has seen the steering group undertaking consultation with residents and other stakeholder organisations, with a view to developing and drafting Neighbourhood Plan objectives and policies with the help of an independent consultant.

3 CURRENT POSITION/FINDINGS

- 3.1 On submission of a Neighbourhood Plan to the local planning authority, the authority must undertake an assessment of the proposed plan against certain criteria. This is required by Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
- 3.2 The following sets out details of the assessment against each of the prescribed criteria (bold headings);
- 3.3 **Is the parish/town council authorised to act?**
Starston Parish Council applied to South Norfolk Council to designate its Neighbourhood Area in line with the civil parish boundary. This application was approved in August 2018. It is therefore considered that the Parish Council is authorised to act in relation to this neighbourhood area.
- 3.4 **Do the proposals and accompanying documents:**
(a) Comply with the rules for submission to the Council?
Regulation 15 of the Neighbourhood Planning Regulations 2012 (as amended) states that the submitted documents should include:
- A map or statement identifying the area to which the plan relates.
 - A Consultation Statement, which contains details of those consulted, how they were consulted, summarises the main issues and concerns raised and how

these have been considered and, where relevant, addressed in the Neighbourhood Plan.

- The proposed Neighbourhood Plan.
- A Basic Conditions Statement, showing how the Plan meets the basic conditions set out in Schedule 4B of the 1990 Act.
- An SEA screening assessment and, if required as a result of the latter, an SEA.

The Parish Council has supplied all of the above documentation.

3.5 Do the proposals and accompanying documents:

(b) Meet the definition of a Neighbourhood Plan?

It is considered that the Starston Neighbourhood Plan meets the definition of a Neighbourhood Plan as set out in Section 38A of the Planning and Compulsory Purchase Act 2004, containing (as it does) a series of planning policies that seek to manage development within the parish.

3.6 Do the proposals and accompanying documents:

(c) Meet the scope of Neighbourhood Plan provisions?

The Starston Neighbourhood Plan clearly states that it is a development plan for Starston, which runs until 2042. The Neighbourhood Plan does not make any provision regarding excluded development. Excluded development is that which is either a 'county matter' (relating to minerals), any operation relating to waste development, or development consisting wholly or partly of a national infrastructure project.

- 3.7** The Neighbourhood Plan only relates to the Starston Neighbourhood Area and it does not repeat an existing planning permission. It is therefore considered that it satisfactorily meets the provisions defined in Section 38B of the Planning and Compulsory Purchase Act 2004.

3.8 Has the parish/town council undertaken the correct procedures in relation to consultation and publicity regarding the Neighbourhood Plan?

Regulation 14 of the Neighbourhood Planning Regulations 2012 states that, before submitting the Neighbourhood Plan to the local planning authority, the Qualifying Body should publicise the Plan and consult the public and stakeholder bodies over a period of six weeks.

- 3.9** The pre-submission (Reg. 14) consultation undertaken by the Parish Council in relation to the draft Neighbourhood Plan is summarised in the Consultation Statement. This provides details of the publicity that was undertaken at this (and prior) consultation stages and the bodies that were consulted on the draft Plan. A copy of the draft Neighbourhood Plan was received by the District Council, for comments, at this stage (which were duly made).

4 PROPOSED ACTION

- 4.1 It is proposed that, as Starston Parish Council has met each of the criteria specified above, South Norfolk Council approves the submission of Neighbourhood Plan and that confirmation of this is sent to the Parish Council.
- 4.2 Once approved, District Council officers will arrange for the Neighbourhood Plan to be published and will invite comments from the public, stakeholder bodies and previous consultees over a minimum period of six weeks. This requirement is set out in Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 4.3 Officers have considered the content of the submitted Neighbourhood Plan to identify whether there are any significant, outstanding issues on which South Norfolk Council may wish to make its own representations during the Reg. 16 consultation.
- 4.4 Several key issues have been identified, which were raised previously by the Council during the pre-submission Regulation 14 consultation. These relate to location, scale and type of residential development, maintaining a strategic gap, important views, local green space, flooding and business development. Details of the proposed representations can be found in Appendix 2. The rationale for making these representations largely relates to concerns around the clarity and viability of the policy requirements, as well as general conformity with a strategic policy within the current development plan.
- 4.5 The Reg. 16 publication period will be followed by an independent examination which will be carried out by a (yet to be appointed) accredited Neighbourhood Plan examiner, in accordance with Regulation 17.
- 4.6 Following the examination (which is normally dealt with via written representations), the examiner will produce a report recommending whether or not the Neighbourhood Plan should proceed to a referendum (with or without certain modifications). South Norfolk Council will then consider this report and decide whether or not to approve the examiner's recommendations.
- 4.7 If it is decided that the Plan should proceed to a referendum, then everyone eligible to vote within the Neighbourhood Area is invited to vote on whether they wish to see the Neighbourhood Plan made. This is a simple 'yes/no' vote and a majority of those voting in favour of the Plan (50%+1) is required before it can be made by South Norfolk Council.

5 OTHER OPTIONS

- 5.1 The submitted Neighbourhood Plan can be refused if it is felt that the criteria discussed above have not been met, or if the Plan is a repeat proposal, as defined in legislation. A written statement would need to be sent to the Parish Council, detailing the reasons why the proposal has not been approved. However, it is

considered that the above criteria have been met and there appear to be no valid reasons for refusal.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** – There are no significant resource implications in approving the submitted Plan. There will be a small amount of officer time required to issue notice of the decision to Starston Parish Council.
- 6.2 The subsequent stages will demand greater officer time (preparing the plan and related documents for consultation, preparing and arranging the examination). This will be resourced from within the Place Shaping Team.
- 6.3 There are limited costs involved in undertaking the consultation, as the majority of this will be via electronic means. A copy of the Neighbourhood Plan will be made available in the local library and at the Council offices, for inspection.
- 6.4 Following the consultation period, there will be costs to the Council associated with the examination and referendum. The average cost of an examination is currently approximately £4,800 and the average cost of a referendum is approximately £4,500. It is worth noting that South Norfolk Council can claim £20,000 from DLUHC (Department for Levelling Up, Housing and Communities) once the authority approves a Neighbourhood Plan to proceed to a referendum, meaning these costs can be recouped.
- 6.5 **Legal Implications** – The steps outlined in this report comply with appropriate legislation within Schedule 4B of the Town & Country Planning Act 1990 and the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 6.6 They also have regard to the Environmental Assessment of Plans and Programmes Regulations 2004 and The Conservation of Habitats and Species Regulations 2010. If successful at referendum, the Neighbourhood Plan will become part of the statutory Development Plan and will therefore be one of the main considerations in the determination of applications for planning permission within the parish.
- 6.7 **Equality Implications** – There are no significant equalities implications associated with the approval of the submitted Starston Neighbourhood Plan. A full Equality Assessment has been carried out in relation to the submitted plan (see Appendix 3).
- 6.8 **Environmental Impact** – The Neighbourhood Plan has been subject to a Strategic Environmental Assessment (SEA) screening and a Habitat Regulations Assessment (HRA) screening, as required by legislation. These initial assessments consider whether the proposed policies in the Plan will have any significant impact on identified environmental objectives or on nearby EU designated sites. No significant impacts have been identified.

- 6.9 **Crime and Disorder** – There are no significant risks associated with the matters covered in this report.
- 6.10 **Risks** – There are no significant risks associated with the matters covered in this report.
- 6.11 There are risks associated with the subsequent stages in the process of adopting a Neighbourhood Plan; specifically that the Plan fails the examination, and also that the Plan fails to gain support during the local referendum. It is felt that these risks are relatively low, at present, and measures will be taken where possible, by either the District Council or Starston Parish Council, to mitigate against their occurrence.

7 CONCLUSION

- 7.1 As discussed above, on submission of a Neighbourhood Plan to the local planning authority, the authority must undertake an assessment of the proposed plan against certain criteria. This is required by Schedule 4B of the Town and Country Planning Act 1990.
- 7.2 As Starston Parish Council has met each of the assessment criteria set out above, the next step is to accept their submission and to start preparations for the Reg.16 consultation.
- 7.3 Officers are proposing a small number of representations to be submitted on behalf of South Norfolk Council, as part of this consultation.

8 RECOMMENDATIONS

- 8.1 It is proposed that Cabinet agree:
1. That the submitted Starston Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
 2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
 3. That the proposed South Norfolk Council response, as detailed in Appendix 2, is formally submitted as part of the Regulation 16 consultation.

Appendix 1: Starston Neighbourhood Plan – submission version

Appendix 2: Proposed South Norfolk Council consultation response (Reg. 16)

Appendix 3: Starston Neighbourhood Plan - EQIA

Background Papers

Starston Neighbourhood Plan submission documents

Starston Neighbourhood Plan 2022-2042



Version 2:
Submission DRAFT
November 2021

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Starston Parish Council,
starstonparishcouncil@yahoo.co.uk

1. Introduction

- 1.1 The Starston Neighbourhood Plan is a community-led document for guiding the future development of the parish. It is about the use and development of land over a 20-year period, 2022-2042. It is the first planning document put together by the community of Starston, following on from the Parish Plan¹ of 2008. Once the Neighbourhood Plan is made and adopted, South Norfolk Council will use it to help to determine planning applications. Starston Parish Council will also use the Neighbourhood Plan to respond to planning applications.
- 1.2 Neighbourhood Planning was initiated in response to a commitment to transfer power to local communities as part of a wider decentralisation agenda.² The Neighbourhood Plan has been developed under the Localism Act (2012) and the Neighbourhood Planning (General) Regulation (2012 as amended), giving communities the right to shape future development at a local level. The Starston Neighbourhood Plan complements existing local and national planning policy, providing a valuable level of local detail attained through consultation with residents and businesses, as well as desk research (further information can be found in chapters 2 and 3).
- 1.3 Commissioned by Starston Parish Council, the Starston Neighbourhood Plan has been developed by a Steering Group of local residents (see Appendix A for Steering Group members), made up of Parish Councillors and other interested residents. The group started off with a day-long workshop setting out the process, drafting a set of aims, a vision and objectives. Throughout the project, Steering Group members attended some of South Norfolk Council and Broadland Council's training sessions on aspects of community-led planning.
- 1.4 Due to COVID-19, the Neighbourhood Plan Steering Group paused the preparation of the Plan writing between Autumn 2019 and Spring 2021 and put energies into serving the Starston community in practical ways. Members of the Steering Group were also keen to understand the implications for the

¹ Parish Plan – this reflects the local vision of how local residents would like to see their area change in coming years. Parish Plans can be much broader than neighbourhood plans, covering more than just planning issues. This optional document is more community-led and can reflect the needs of an individual town or village and surrounding countryside. Source: CPRE.

²Parker, G., Salter, K. and Wargent, M. (2019), 'Concise guides to planning: Neighbourhood Planning in Practice'.

parish of the then-emerging Greater Norwich Local Plan and the emerging South Norfolk Village Clusters Housing Allocations Plan. As virus rates reduced, the group started work again on completing the drafting of the document in Spring 2021.



Figure 1: Starston Neighbourhood Plan Steering Group at the beginning of the process.

- 1.5 The aims for the Neighbourhood Plan were ratified through consultation with the community and are as follows:

By undertaking a Neighbourhood Plan, Starston parish aims to:

- give a voice to residents to shape development and reach consensus.
- allow the village to grow sensitively and sustainably.
- enhance the sense of community.
- protect and maintain the natural environment.
- identify community needs for the use of developer contributions.

- 1.6 The Starston Neighbourhood Plan is not a means of stopping development; it is there to ensure that any development takes place in an appropriate way for the area. Once adopted, the Plan will become a statutory planning policy document, sitting alongside the Local Plan (at the time of writing, the Joint Core Strategy, the emerging Greater Norwich Local Plan and the emerging South Norfolk Village Clusters Housing Allocations Plan). The Neighbourhood Plan provides clarity on what will be expected from development proposals, gives prospective investors confidence in how the area will change in the future, and ensures that the impact of any development is anticipated and planned for in Starston.

- 1.7 This is the second draft of the Starston Neighbourhood Plan, prepared for submission to South Norfolk Council (Regulation 15 and 16 of the Neighbourhood Planning General Regulations 2012). From 9th July 2021 until 30th August 2021, local residents and statutory agencies had the opportunity to comment on the draft Plan. During September 2021 all comments were collated and considered by the Neighbourhood Plan Steering Group. The Plan was amended for submission during September and October 2021.

Accompanying supporting documents

- 1.8 The fundamental principle underpinning the planning system in England remains that of achieving sustainable development. Therefore this draft version of the Neighbourhood Plan is supported by a Sustainability Appraisal, a systematic process undertaken during the preparation of the Plan that assesses the environmental, social and economic impacts of the policies.
- 1.9 The Starston Neighbourhood Plan is submitted for independent examination accompanied by the following documents:
- **Starston Design Guidelines and Codes** – guidelines and codes on how to design the physical environment of Starston (supplementary supporting document).
 - **Basic Conditions Statement** – showing how the Starston Neighbourhood Plan has been prepared in accordance with the Neighbourhood Planning General Regulations 2012.
 - **Consultation Statement** – showing the consultation process employed in the production of the Starston Neighbourhood Plan and how the requirements of Regulations 14 and 15 of the Neighbourhood Planning General Regulations 2012 have been satisfied.
 - **Sustainability Appraisal Scoping Report** – developed to inform the content of the emerging Neighbourhood Plan, outlining key data and the method to be used for the Sustainability Appraisal.
 - **Sustainability Appraisal** – a systematic process undertaken during the preparation of the Neighbourhood Plan, to test and inform the policies, ensuring that environmental, economic and social sustainability aspects are considered.
 - **Strategic Environmental Assessment Screening Report** – to determine whether the Starston Neighbourhood Plan requires a full Strategic Environmental Assessment.
 - **Habitat Regulation Screening Report** – to assess whether there are likely to be any significant effects on European Sites as a result of the

emerging policies set out in the draft Neighbourhood Plan that would necessitate the production of a full Habitat Regulations Assessment.

Examination and referendum

- 1.10 After submission, South Norfolk Council will undertake a checking process and further consultation (Regulation 16 of the Neighbourhood Planning General Regulations 2012). It will then go through an independent examination. Subject to the Examiner's report, the Neighbourhood Plan should then proceed to local referendum in Starston.
- 1.11 At referendum, every resident of Starston who is entitled to vote in South Norfolk Council elections and is aged 18 years or over, will have the opportunity to vote on whether or not they agree with the Neighbourhood Plan. At referendum, residents will be asked, *'Do you want South Norfolk Council to use the Neighbourhood Plan for Starston parish to help it decide planning applications in the neighbourhood area?'* If the Plan gets at least 50 per cent support from those that vote in the referendum, South Norfolk Council will adopt the Neighbourhood Plan.



Figure 2: Neighbourhood Plan event banner.

2. Starston parish

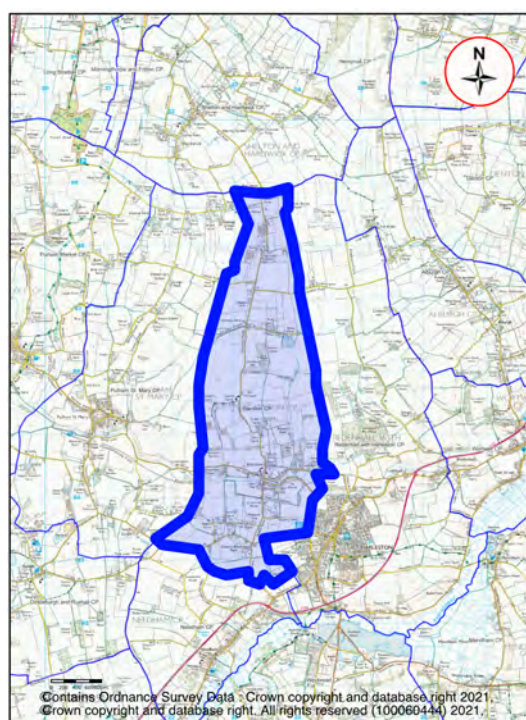


Figure 3 left: Starston parish, the Neighbourhood Plan area (source: Parish Online). Blue line denotes parish boundary.

Figure 4 above: Starston parish, the Neighbourhood Plan area, and the surrounding parishes (source: Parish Online). Blue line denotes parish boundary.

2.1 Starston is a small village in South Norfolk district, bordering the market town of Harleston. The parish covers an area of 9.02km² and had a population of 331 at the time of the 2011 Census; it was estimated at 335 in 2016.³ The number of households in 2011 was 143. In 1877, according to the Census, the population had been 545.

³ www.norfolkinsight.org.uk, 26.11.2018.

- 2.2 Starston appears in the Domesday Book of 1086 as 'Sterestuna' and measured a mile and five furlongs long and five furlongs wide. The name of the parish may be derived from a combination of the old English word for an enclosure, 'Tun', and the old Norse personal name 'Styrr's'.⁴ As settlements grew in size, a Tun came to mean a farm, a village or even a town. The name village may thus have meant 'the farm belonging to Styrr'. Alternatively, perhaps, it signified 'an enclosure for cattle' (steers). Farming continues to be the principal land use within the parish.



Figure 5: An Edwardian scene on the Starston bridge across the Beck, with St. Margaret's Church in the background. Source: Becky Gurney.

- 2.3 The centre of the village is designated as a Conservation Area, with the Grade I listed church of St. Margaret, dating from about 1300, at its heart. The village has a high number of listed buildings in relation to its size. Many historic buildings are now private houses: the school which closed in 1969; The Gate public house which closed in 1954, (although it continued as the village shop and Post Office for some years); the farm buildings originally part of Home Farm at Starston Place; the Rectory, the Station House and the Blacksmith's Shop. The Jubilee Hall is a converted cowshed formerly belonging to the Rectory. A number of other notable buildings have been demolished over the years, several within living memory. For example,

⁴ <http://www.heritage.norfolk.gov.uk/record-details?TNF1249>, 09.11.2018.

Starston Place, probably at least the second manor house to be built on the site, was demolished around 1960; and the remains of Priory Farm along Skinner's Lane can still be seen when the soil is ploughed. Rather longer ago, Archdeacon Oldershaw's house, which was next to the Rectory, was pulled down around 1850. The old 'Town House' for housing the poor of the parish, which stood on what is now part of the churchyard, was demolished in the early part of the 19th century and replaced by Stone Cottage, built in 1828, along Pulham Road. In 1856 the Waveney railway line was built with a station just south of the village giving access to Norwich but closed in 1866.

- 2.4 A windmill in Rushall Road was physically moved in the 1870s to St. James, South Elmham, where it continued to operate as a working mill until 1923. Still in position beside the Beck, albeit no longer operational, is a rare hollow-post wind pump, one of only two in the country, which was originally installed to provide a water supply for the livestock at Home Farm. It is Grade II listed and a scheduled monument that remains a feature of the village and has been restored.⁵ The Glebe Meadow, which had once been church land but for some years had been in private ownership, came up for sale in 2010 and was bought by the community.

Figure 6: Katie Moore shyly presents a bouquet to Mrs Sybil Lombe-Taylor who unveiled Starston's village sign in 1980.



Spatial and strategic policy context

- 2.5 Every local planning authority in England has to prepare a Local Plan, which includes all of the local planning policies for that area and identifies how land is currently used and determines what will be built where. The Neighbourhood Plan is an opportunity for Starston to add detail specific to

⁵ Starston Parish Plan, 2008.

the area. The Local Plan and the Neighbourhood Plan must be consistent with the National Planning Policy Framework (NPPF).

- 2.6 The NPPF was published in March 2012 and revised in July 2021. It sets out the Government's planning policies for England and how these should be applied. The Starston Neighbourhood Plan is believed to be in conformity with the revised NPPF, in particular taking a positive approach that reflects the presumption in favour of sustainable development.
- 2.7 The 'Joint Core Strategy for Broadland, Norwich and South Norfolk' (JCS) is the current key planning policy document for the sub-regional Greater Norwich area. It forms part of the Local Plans for the districts of Broadland, Norwich and South Norfolk, setting out the broad vision for the growth of the area and containing strategic policies for the period up to 2026. The Starston Neighbourhood Plan is also believed to be in conformity with the JCS.
- 2.8 JCS Policy 16 identifies Starston as an 'Other Village'. It has a defined development boundary within which very limited infill development can occur without affecting the form and character of the village.⁶
- 2.9 The Greater Norwich Local Plan (GNLP) will supersede the JCS, which at the time of writing is being prepared and due to be adopted in 2022. The Starston Neighbourhood Plan goes beyond the plan period for the JCS and the emerging GNLP (which will go to 2038). Like the JCS, the GNLP will include strategic planning policies to guide future development and plans to protect the environment. It will look to ensure that delivery of development is done in a way that promotes sustainability and the effective functioning of the whole area. Starston will also be covered by the 'South Norfolk Village Clusters Housing Allocations Plan', expected to be adopted in 2023.

⁶ Joint Core Strategy for Broadland, Norwich and South Norfolk.

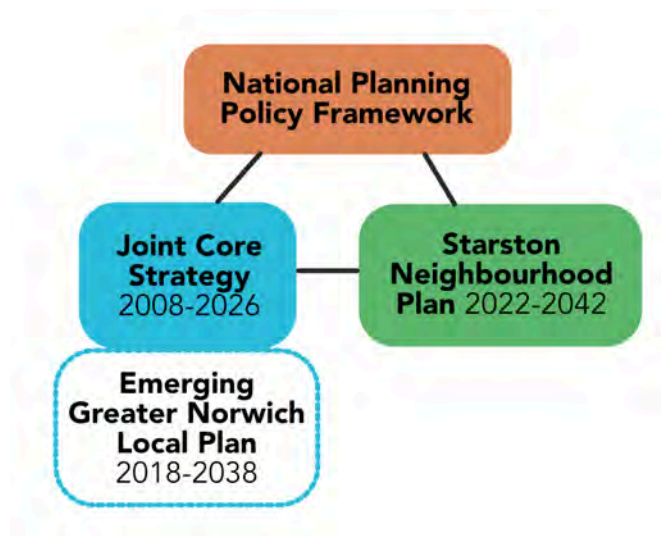


Figure 7: Spatial and strategic policy context: relationship between the NPPF, JCS, emerging GNLP, and the Starston Neighbourhood Plan. Own diagram.

South Norfolk Village Clusters Housing Allocations Plan

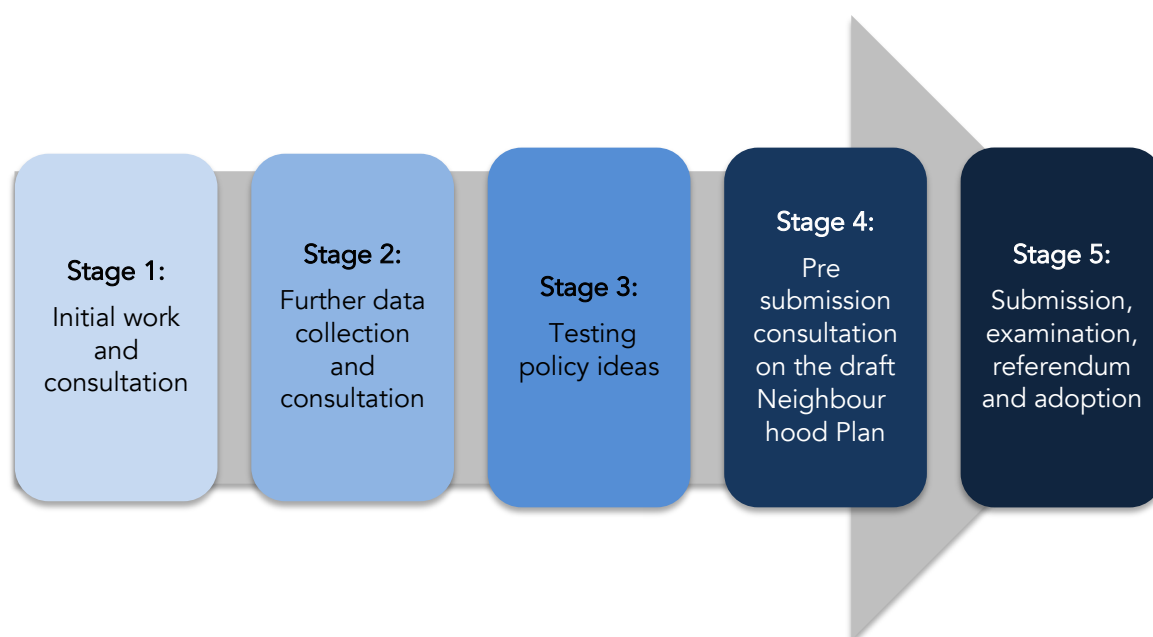
- 2.10 The South Norfolk Village Clusters Housing Allocations will form part of the South Norfolk Local Plan, identifying land for some 1,200 new homes in the villages of South Norfolk district, expected to be adopted in 2023. Starston is clustered with Needham, Brockdish and Wortwell for allocations. Following public consultation and an examination, the village cluster policy is expected to be finalised in 2022, following closely behind the GNLP. At the time of writing, the draft policy for Starston states that, 'Due to its dispersed character, attractive valley landscape and extensive conservation area, the Settlement Limit [otherwise referred to as the settlement boundary] has been drawn to reflect the existing settlement form in three separate parts to prevent further development extending into the surrounding open countryside. No alterations are proposed to the existing Settlement Limit'. At the time of writing there are no allocations for development within Starston parish.

3. How the Plan was prepared

- 3.1 The Neighbourhood Plan Steering Group has prepared the Plan with support from a team of two independent consultants. The process started in Summer 2018, and the Neighbourhood Area was designated in August 2018.
- 3.2 The Plan has been commissioned by Starston Parish Council. Funding has come from a central government Locality grant and a South Norfolk Council grant for Neighbourhood Plans.

Community engagement and consultation

- 3.3 The Starston Neighbourhood Plan has been undertaken with extensive community engagement, consultation and communication. There have been five stages in which the Neighbourhood Plan Steering Group has actively engaged the community through consultation. More details of the consultation process are outlined in the Consultation Statement that accompanies the submission of the Neighbourhood Plan to South Norfolk Council in Autumn 2021.
- 3.4 Below is a summary of each of the 5 stages.



Stage 1: Initial work and consultation (Autumn 2018)

- Steering Group workshop, where aims, vision and objectives were drafted.
- Information boards in the Jubilee Hall to test the draft vision and outline the process.
- Drop-in event (17th November 2018) in the Jubilee Hall to establish key issues and themes in the parish. Flyers delivered to every household. 67 people attended. Key themes included broadband, home working, a strategic gap between Starston and Harleston, the importance of the Beck, traffic calming, new footpaths, infill, scale of the development, types of housing and the location of housing.



Figure 8: Information boards in the Jubilee Hall to test the draft vision and outline the process.



Figure 9: Drop-in event in the Jubilee Hall, 17th November 2018.

Stage 2: Further data collection and consultation (Winter/Spring 2019)

- Stakeholder meetings: Jubilee Hall Management Committee; home workers; landowners; St. Margaret's Parochial Church Council; Saffron Housing.
- Business survey and interviews.
- Youth engagement session.
- Scoping Report for the Sustainability Appraisal, containing key data about the parish.



Figure 10: Youth engagement session poster.

Stage 3: Testing policy ideas (Spring/Summer 2019 and Spring 2021)

- Settlement boundary review. Form sent to every household (February/March 2019).
- Policy ideas workshop (27th April 2019) and online responses, to check emerging policy ideas, review settlement boundary options and develop further detail to write the Neighbourhood Plan. Flyers delivered to every household. 64 people attended.
- Housing Needs Survey. Form sent to every household (July 2019).
- Development of the Starston Design Guidelines and Codes (Spring 2021).



Figure 11: Flyer for policy ideas workshop, 27th April 2019.



Figure 12: Policy ideas workshop in the Jubilee Hall, 27th April 2019.

Stage 4: Pre submission consultation on the draft Neighbourhood Plan (regulation 14) (Summer 2021)

- Draft Neighbourhood Plan out for pre-submission consultation (from 9th July 2021 until 30th August 2021). Sent to statutory agencies and available for residents to comment.
- Consultation launched with an exhibition in the Jubilee Hall on 9th July from 6pm-8pm, and 10th July from 10am-1pm. Copies of the Plan were also available in St. Margaret's Church, the Jubilee Hall and online until 30th August.



Figure 13: Flyer for pre-submission consultation exhibition on the draft Neighbourhood Plan, 9th and 10th July 2021.



Figure 14: Pre-submission consultation exhibition, 9th and 10th July 2021.

Stage 5: Submission, examination, referendum and adoption (Autumn 2021 to Winter 2021/22)

- Modifications following pre-submission consultation (September/October 2021).
- Submission of the Neighbourhood Plan to South Norfolk Council with supporting documents (November 2021).
- Examination (Autumn 2021).
- Referendum and adoption (Winter 2021/22).

Communication

- 3.5 Communicating with residents and businesses through the development of the Starston Neighbourhood Plan was particularly important at consultation stages and also in between as the Plan developed.
- 3.6 The village website www.starstonvillage.co.uk was used for steering group meeting agendas, minutes, the terms of reference, documents, consultation publicity and results, details of the process, draft policies, *Pigeon Post* reports, useful links regarding Neighbourhood Planning and contact details.
- 3.7 *Pigeon Post* (the monthly parish magazine delivered to every household) had regular articles about the Neighbourhood Plan and advertised consultation events.

- 3.8 Facebook, posters, flyers and banners were used to promote events. An update for the Parish Council on the Neighbourhood Plan's progress was presented at its bi-monthly meetings.



4. Vision and objectives

- 4.1 The Neighbourhood Plan vision is an overarching statement describing what Starston should be like at the end of the Plan period, 2042.
- 4.2 The vision sets out what Starston residents wish their parish to be like in 20 years' time. It was drafted in response to early consultations and then finalised through further liaison with residents. The vision attempts to capture what is unique about Starston parish now, whilst looking ahead 20 years to what it will be.

VISION

Starston will continue to be a small and vibrant rural parish, with a strong sense of community. As a distinct settlement from Harleston, it will have a variety of appropriate housing that meets local need and is in keeping with the character of Starston. The natural environment will be safeguarded. Opportunities for walking and cycling will be sought. Starston will be a place where people of all ages choose to live, work and visit into the future.

- 4.3 Under the vision sits a series of objectives regarding Development and Design, Environment and Landscape, and Business and Employment. Each relates back to the vision. Under each objective there is a policy or set of policies, including the Starston Design Guidelines and Codes.

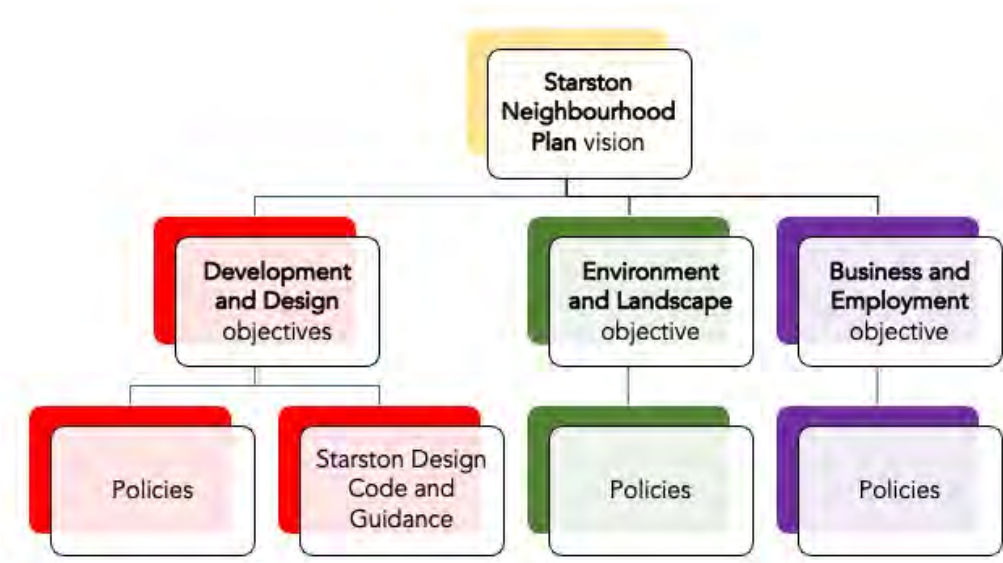


Figure 15: Structure of the Starston Neighbourhood Plan.

Objectives of the Neighbourhood Plan

- 4.4 The objectives of the Neighbourhood Plan are broad statements of intent, there to help deliver the vision and address key issues in Starston. The objectives were drafted early on in the process and checked with the community through each of the consultation stages.

Development and Design

- Objective 1: To support a small amount of appropriate new housing development for a mixed community.
- Objective 2: To encourage well-designed and well-located development that complements the distinctive character of Starston.

Environment and Landscape

- Objective 3: To protect and enable access to the countryside.

Business and Employment

- Objective 4: To encourage and support new and existing businesses.

5. Policies

- 5.1 The vision and objectives provide the framework to develop the policies in the Neighbourhood Plan. Each policy relates back to a particular objective under the following three broad themes: Development and Design; Environment and Landscape; Business and Employment.
- 5.2 The Neighbourhood Plan is first and foremost a land use document for planning purposes. All policies in the Plan have been derived from a series of consultation events, stakeholder engagement and desk research, which provide the justification and evidence base for them.
- 5.3 The Neighbourhood Plan policies follow the government's guidance. They exist to:
- Set out requirements in advance for new development in the area.
 - Inform and guide decisions on planning applications.
 - Ensure that the multitude of individual decisions add up to something coherent for the area as a whole⁷.
- 5.4 To aid interpretation for decision makers and planning applicants, each policy is accompanied by supporting text, which includes context for the theme, the views of residents, guidelines and reference to strategic plans. This is set out before each of the policies.

Development and Design POLICIES

STA1: Location and scale of residential development
STA2: Type of residential development
STA3: Conservation Area and listed buildings
STA4: Design principles (including the Starston Design Guidelines and Codes, supplementary supporting document)

Environment and Landscape POLICIES

STA5: Strategic gap
STA6: Important public local views and vistas
STA7: Local Green Spaces
STA8: Surface water drainage

⁷ Tony Burton, Writing Planning Policies, Locality.

Starston Design Guidelines and Codes

- 5.5 The Starston Design Guidelines and Codes report is part of the Starston Neighbourhood Plan, a key feature of the Development and Design policies. The piece of work was undertaken by AECOM, commissioned by Locality. The document advises on how to design the physical environment to create distinct and lively places integrated within the parish.

Figure 16: Front cover of the Starston Design Guidelines and Codes (supplementary supporting document).



Community action projects

- 5.6 As expected, during consultation the local community identified a number of projects that fall outside the remit of planning policy. These are projects that are unlikely to be addressed through development alone but support the aims of this Neighbourhood Plan. These are called 'community action projects' and are found in chapter 7. Community action projects will be taken forward outside the Neighbourhood Plan process. It is not an exhaustive list.



5.1 Development and Design

- 5.1.1 Data from the 2011 Census shows the number of households in Starston parish as 143. Of these, 138 (96.5 per cent) had at least one usual resident and 5 (3.5 per cent) had no usual residents,⁸ indicating that the majority of dwellings contain permanent residents of the village.
- 5.1.2 Household composition data from the 2011 Census shows that Starston has 22.5 per cent of one-person households, 74.6 per cent of one-family households and 2.9 per cent of 'other' households, which don't fall into the categories given. Starston has 7.2 per cent of one-person households aged 65 and over, compared to 14.3 per cent for Norfolk.
- 5.1.3 74.6 per cent of homes in Starston are owned, compared to 66.9 per cent for Norfolk. 0.7 per cent are shared ownership, 4.3 per cent are social rented, 17.4 per cent are private rented and 2.9 per cent are living rent free.⁹
- 5.1.4 62.2 per cent of dwellings are detached houses and bungalows in Starston, compared to 39 per cent for Norfolk. 33.6 per cent of dwellings are semi-detached, compared to 29.4 per cent for Norfolk. 3.5 per cent of dwellings are terraced and 0.7 per cent are flats, maisonettes and apartments in a converted house.
- 5.1.5 The property website Zoopla.co.uk suggests that the average price paid for a house in Starston during the year October 2017 to October 2018 was £452,571, and the average value of property in November 2018 was £265,983; property prices had increased 1.24 per cent over the previous year.¹⁰

⁸ www.nomisweb.co.uk, Census data 2011, 06.11.2018.

⁹ Rural Services Online, 11.09.2011.

¹⁰ Zoopla.co.uk, 06.11.2018.

5.1.6 Development is defined as ‘the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land’.¹¹ This is the concern of the Neighbourhood Plan policies. The vast majority of Starston parish is agricultural land (see figure 17). At the time of writing, the Joint Core Strategy, policy 16, classifies Starston as an ‘Other Village’, with ‘defined development boundaries to accommodate infill or small groups of dwellings and small-scale businesses or services, subject to form and character considerations’.¹² Starston is not expecting significant development.

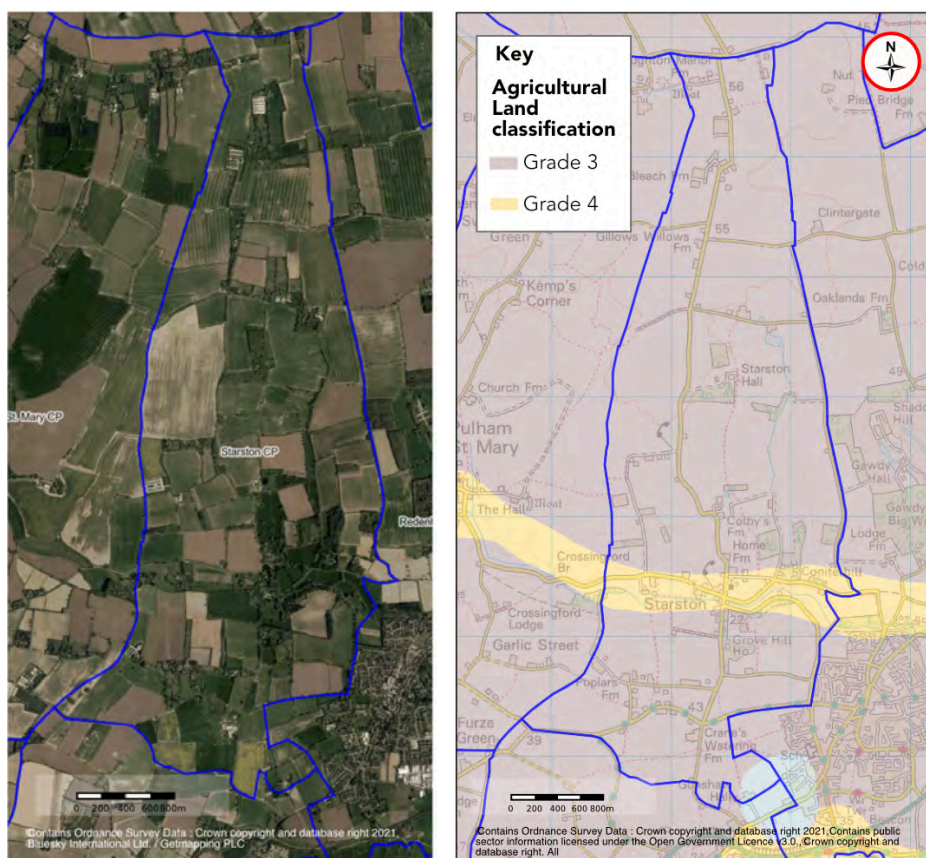


Figure 17: Left, aerial view of Starston parish showing that it is mostly agricultural land. Right, indicative agricultural land classification map, showing that the majority of land is grade 3 (source: Parish Online). Blue line denotes parish boundary.

5.1.7 Between 1856 and 1866, Starston had its own railway station on the Waveney Valley line before it was shut to passenger trains through lack of usage. Freight and passenger through-trains continued until the 1960s.¹³ The nearest train station now is Diss, some 16km from Starston.

¹¹ Town and Country Planning Act 1990, Section 55.

¹² Joint Core Strategy for Broadland, Norwich and South Norfolk, adopted March 2011, amendments adopted January 2014.

¹³ Wikipedia, 08.07.19.

- 5.1.8 At the time of writing, Starston has a bus service which runs from Starston to Harleston and Starston to Norwich. The Borderhoppa also provides a dial-a-ride community transport service.
- 5.1.9 Car ownership and car dependency levels in Starston are high. Only 2.9 per cent of the population has no access to a car or van, compared to 11.7 per cent for South Norfolk. 40.6 per cent of households have one car or van in the household, 39.1 per cent have two cars or vans, 11.6 per cent have three cars or vans and 5.8 per cent have four or more cars and vans in the household.
- 5.1.10 Distance travelled to work data from the 2011 Census shows that 5.7 per cent of residents in employment travel less than 2km, 12.7 per cent travel 2 to 5 km, 9.3 per cent travel 5 to 10km, 16.1 per cent travel 10 to 20km, 14.4 per cent travel 20 to 30km, 2.9 per cent travel 30 to 40km, 2.4 per cent travel 60km and over, 24.9 per cent work mainly from home, and 11 per cent fall into a category of 'other'. Working from home is addressed in chapter 5.3.
- 5.1.11 There is no school or pre-school provision in Starston. At the time of writing, children from the parish go to six different primary schools, half to local villages and half to Harleston. Equally, grocery shopping is largely done in Harleston. Whilst Harleston is not far to travel – 2.5km from The Street in Starston to the middle of Harleston – there are a number of issues that reduce the ability to walk or cycle that were identified through consultation with the community:
- Speeding on Hardwick Road, Railway Hill, Rushall Road, The Street, Hallwong Lane/Low Road and Harleston Road.
 - Large agricultural vehicles driving too fast on narrow rural roads.
 - Lack of footpaths and safe cycle routes.
- 5.1.12 The Neighbourhood Plan encourages development that addresses the impact of climate change by reducing the reliance on the private car, through the provision of good walking and cycling. Any new development provides an opportunity to put in new footpaths and cycle ways to connect up the village and would be welcomed.

Objective 1: To support a small amount of appropriate new housing development for a mixed community.

5.1.13 In 2008, the Starston Parish Plan gave members of the community an opportunity to voice their opinions on what actions they wished to see take place in the local area. 95 per cent of residents responded. Page 11 of the Parish Plan stated, 'Housing development was seen overwhelmingly as the major planning issue. It was the subject of around 60 responses. The major concern was with the pace and scale of development. A cluster of responses focused on housing need in the village, both affordable housing to allow people, including young people, to stay or return, as well as bungalows for the elderly. There is inevitably a tension between those who want to see no change at all at one end of the scale, and at the other, those who wish to see some new housing and a degree of growth in the village, including other kinds of development. The highest level of support was for 'slow and careful development'.

5.1.14 Furthermore, the Parish Plan stated, 'when we asked how much additional housing can Starston accommodate over the next 10 years, 28 (22 per cent) said none, 79 (63 per cent) said from 0 to 10 houses, and 19 (15 per cent) said more than 10'. Many comments were supportive of modest and sympathetic infill development but were opposed to any major development due to the impact it would have on the character of the village, the lack of facilities such as schools and shops, and the lack of infrastructure including mains sewage and adequate roads.

5.1.15 Ten years on, the Neighbourhood Plan set out to test whether the views of the community had remained broadly the same regarding housing development, in particular the desire for 'slow and careful development'. 85 per cent of those that attended the Neighbourhood Plan consultation event in November 2018 said they wanted more housing in Starston, but that it should be very limited, respecting the character of Starston as a small village: for example, 'responsible house building on an infill basis, especially for families and children to encourage younger members in this village', and 'infill between existing houses, allowing homes for young people wishing to live in our special village'.

5.1.16 Given the premise that a small amount of appropriate new housing development would be welcomed by the majority of the parish, two restrictions were identified by the Steering Group, meaning that small scale development was unlikely to be achieved without policy intervention at a local level:

- Local Plan policy – Starston is classed as an 'Other Village' in the current Joint Core Strategy and the emerging Greater Norwich Local Plan. This means only very limited infill development only. There is no

appetite to challenge the 'Other Village' status, particularly as Starston has limited services, no school, doctor's surgery or shop. There is no known community aspiration for large-scale housing development. An early consultation quote that was widely supported stated 'sensible infill but not vast developments'¹⁴. It is for this reason that the Neighbourhood Plan did not undertake its own 'call for sites', inviting new potential allocations of land for development.

- Settlement boundaries¹⁵ – as currently drawn, there is very limited potential for further development (see figure 18). All other parts of the parish are considered 'open countryside', where there is an overriding presumption against development.

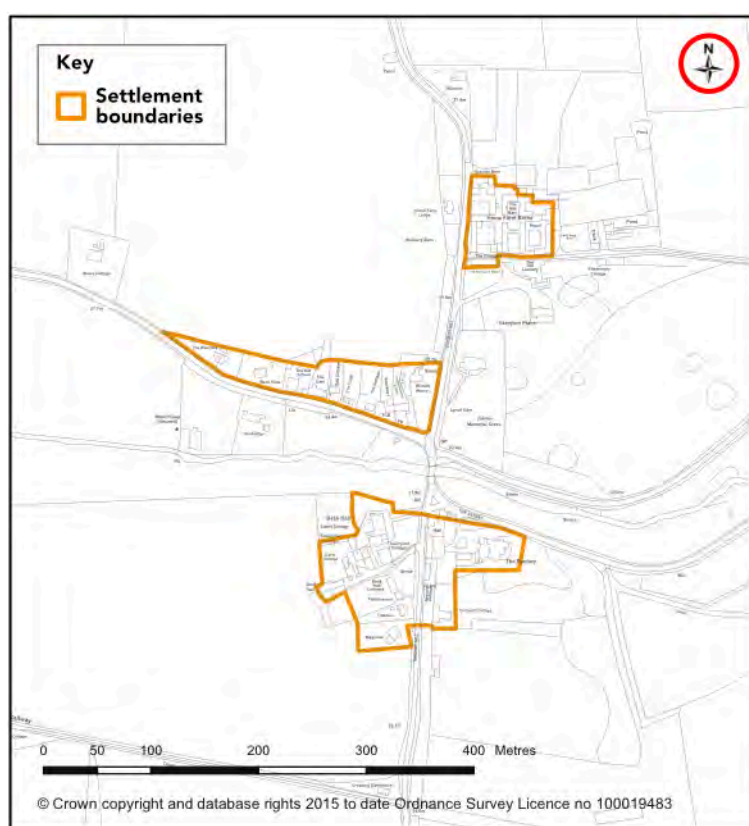


Figure 18: Settlement boundaries (source: Local Plan Site Specific Allocations and Policies DPD map 077, with Conservation Area removed, with own annotations).

5.1.17 In an attempt to allow for 'slow and careful development', during February/March 2019 the Neighbourhood Plan Steering Group undertook a 'review of settlement boundaries'. A form was sent to every household in the parish. Residents were invited to draw on a map where they thought a new settlement boundary should go. By exploring the potential for creating new

¹⁴ Results and analysis, 17th November 2018 Neighbourhood Plan parish workshop.

¹⁵ A 'settlement boundary' (historically known as the 'village envelope') is a line drawn on a parish map showing where new development (housing or business use) might take place. Anything outside the line is considered 'open countryside'.

settlement boundaries, Starston may have been able to accept small-scale, well-planned development, protect the countryside from unnecessary buildings, and give some certainty to landowners as long as they adhere to other planning policies.

- 5.1.18 A total of 33 community responses were received. These were analysed and amalgamated into 11 different options, plus a 'no change' option. These were: Highlands Farm area; Whitehall Cottage; east end of Skinners Lane; Woodside Stables; west end of Cross Road; centre of Cross Road; north of Rushall Road, south of The Street to east of wind pump; west end of Rushall Road; south of Rushall Road; Church Hill; and no change to settlement boundaries.
- 5.1.19 In April 2019, a further consultation event was held to test emerging policy ideas and the 11 different settlement boundary options, plus a no change option. There was a mixed response to each of the potential settlement boundaries, with varying levels of support for the different options. Subsequently a draft settlement boundary assessment was undertaken on each of the options. The Steering Group concluded that creating a few new small settlement boundaries around certain dispersed properties would be problematic, on the basis that they would only allow small-scale development in particular locations, benefiting individual members of the community, rather than potentially achieving what was best for the parish as a whole.
- 5.1.20 Also, current NPPF housing density requirements (estimated at approximately 20 properties per hectare for the Starston area) would likely enable too much development per new settlement boundary, not in conformity with the JCS or the emerging GNLP, or the aspirations of the local community. A comment at the ideas workshop stage stated a common concern that, 'once a boundary is in place there is no guarantee these densities will be observed'.¹⁶
- 5.1.21 As an alternative to the creation of new settlement boundaries, policy STA1 provides for limited new small-scale residential development outside the existing settlement boundaries (in addition to that which could take place within the current boundaries).
- 5.1.22 The scale of development, up to 10 dwellings across the parish in a 10-year period, is based on community aspirations, again to enable 'slow and careful development', allowing Starston to continue to be a small and vibrant rural parish, with a strong sense of community. This supports slightly more

¹⁶ Neighbourhood Plan ideas workshop, 27th April 2019.

development than policy 7.5 in the emerging GNLP 'Small Scale Windfall Housing Development', which limits the number of homes on small scale windfall sites to three in each smaller parish¹⁷. The justification for this greater number is that it represents the wish of the local community, as expressed during consultation.

POLICY

STA1: Location and scale of residential development – exception policy

Proposals for a limited amount of new small-scale residential development will be supported outside the existing settlement boundaries, in areas where there are groups of housing. To protect the dispersed and spatial character of the village, new development should not take the form of an extension to an existing settlement boundary and should avoid altering the defined extent of the village core and its setting in open countryside.

Up to 10 dwellings will be supported across the parish in the lifetime of the Plan. This includes windfall housing identified in the emerging GNLP and the reuse and conversion of redundant farm buildings that require permission.

New dwellings should be consistent with the character of the immediate vicinity. Up to 2 new dwellings per location will be supported, subject to meeting the following requirements. New development must:

- Clearly form part of an existing group of dwellings.
- Have good accessibility to local services and facilities.
- Avoid areas of flood risk.
- Ensure that road safety is not compromised.
- Positively contribute to the character of the area.
- Comply with the Design Guidance and Codes (supplementary supporting document).

5.1.23 Should new housing be built, a choice of different types of residential development would support a sustainable, mixed and inclusive community. Those listed in policy STA2 are types of housing that have arisen through consultation with the community. Through each stage of consultation on the Neighbourhood Plan ideas, affordable housing came out strongly, e.g. 'small development in keeping with the area, affordable for young people'.¹⁸

¹⁷ Paragraph 389, policy 7.5 of the emerging Greater Norwich Local Plan (Regulation 19), <https://www.gnlp.org.uk/regulation-19-publication-part-1-strategy-section-5-strategy-policy-7-strategy-areas-growth-15>. Extracted 28.9.21

¹⁸ Results and analysis: 17th November 2018 Neighbourhood Plan parish workshop.

Overwhelmingly, there has been support for young people to have the ability to be able to stay where they have grown up. Young people were asked, 'What would you like the village to be like in 20 years' time?'. One young person answered, 'Housing for local young people if they wish to stay in the village is important, but this does need to be cheap and affordable'.¹⁹

Smaller homes are also attractive for downsizing, particularly for those living locally who no longer want to live in a family sized home. The Parish Plan identified bungalows, but consultation results for the Neighbourhood Plan were not as specific.

5.1.24 Consultation revealed that there was little support for more 'social rent' affordable housing, but rather open market starter homes. Of the respondents to the Housing Needs Survey (August 2019), eight households stated that their current home would not be suitable within the next five years; four referred directly to requiring retirement accommodation, one on account of a growing family and another for a starter home for when their children started a family. Specifically, the Housing Needs Survey showed the following accommodation was preferred by those currently living in the village and who responded to the survey: 1 x starter home; 1 x bungalow for retirement; 1 x family home to retire to; 2 x 4-bedroom family house; 1 x 3-bedroom family house; 1 x bungalow (self-build).²⁰ Note, only those who had self-identified as in housing need responded to this survey.

5.1.25 Recognising the high value that Starston residents place on the sense of community, most are eager to stay on in the village. It is therefore desirable that any new homes are built as 'lifetime homes', allowing older people to stay in their own homes for longer, reducing the need for home adaptations and giving greater choice to people with disabilities who cannot achieve independent living due to lack of suitable housing.²¹

5.1.26 Homes for agricultural workers and the redevelopment of redundant farm buildings is a particular concern to the parish, where agricultural workers are not able to afford accommodation locally, and where redundant farm buildings could be transformed into a dwelling. Paragraph 2.56 and 2.57 of the South Norfolk Local Plan Development Management Policies Document (adopted version, October 2015) states that, 'The creation of additional isolated dwellings in the countryside is generally regarded as unsustainable; however, conversion [to] residential uses will be supported where there is a

¹⁹ Stakeholder engagement – young people, 02.03.19.

²⁰ Starston Housing Needs Survey, August 2019.

²¹ Taken from the definition of Lifetime Homes, https://www.designingbuildings.co.uk/wiki/Lifetime_homes, extracted 17.03.21.

compelling case to allow this in order to protect an important traditional building... Buildings suitable for conversion should generally be in keeping with rural character in terms of scale, siting and appearance and be of permanent and substantial construction.’ Starston parish supports the reuse and adaptation of redundant farm buildings where they are in keeping with the character of Starston. The character appraisal (Appendix B) and the Design Guidance and Codes (supplementary supporting document) should be referred to.

POLICY

STA2: Type of residential development

Across Starston there should be a range of housing types to meet the needs of a mixed community. The following development will be encouraged:

- Open market starter homes²² and homes for newly formed households.
- Small homes for downsizing.
- Lifetime homes.
- Homes for agricultural workers, in accordance with the South Norfolk Development Management policy.
- Reuse and conversion of redundant farm buildings only where there is evidence that the building is no longer required for agricultural purposes.
- Custom-build²³ or self-build properties.

Objective 2: To encourage well-designed and well-located development that complements the distinctive character of Starston.

5.1.27 Part of Starston parish is identified as a ‘Conservation Area’, deserving special management. Conservation areas exist to manage and protect the special architectural and historic interest of a place – in other words, the features that make it unique.²⁴ In December 2019 South Norfolk Council adopted the

²² Starter homes are the new affordable housing product designed by the government to specifically meet the housing needs of younger generations and allow them to access homeownership. Source: <https://lichfields.uk/blog/2016/may/24/housing-and-planning-act-2016-essential-guide-to-starter-homes/>. Extracted 20.05.21

²³ Custom build is a new form of housing procurement that enables people to design and create their own home as part of a supported process. Source: www.custombuildhomes.co.uk, 09.07.19.

²⁴ Historic England, <https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>. Extracted 08.07.19.

'Starston Conservation Area Character Appraisal and Management Guidelines'. Key characteristics identified are as follows:

- Rural settlement originally central to large estate.
- Road bridge and river meadows form the centre of the Conservation Area.
- Strong natural character throughout.
- Shallow valley, river running west to east with wooded landscape.²⁵

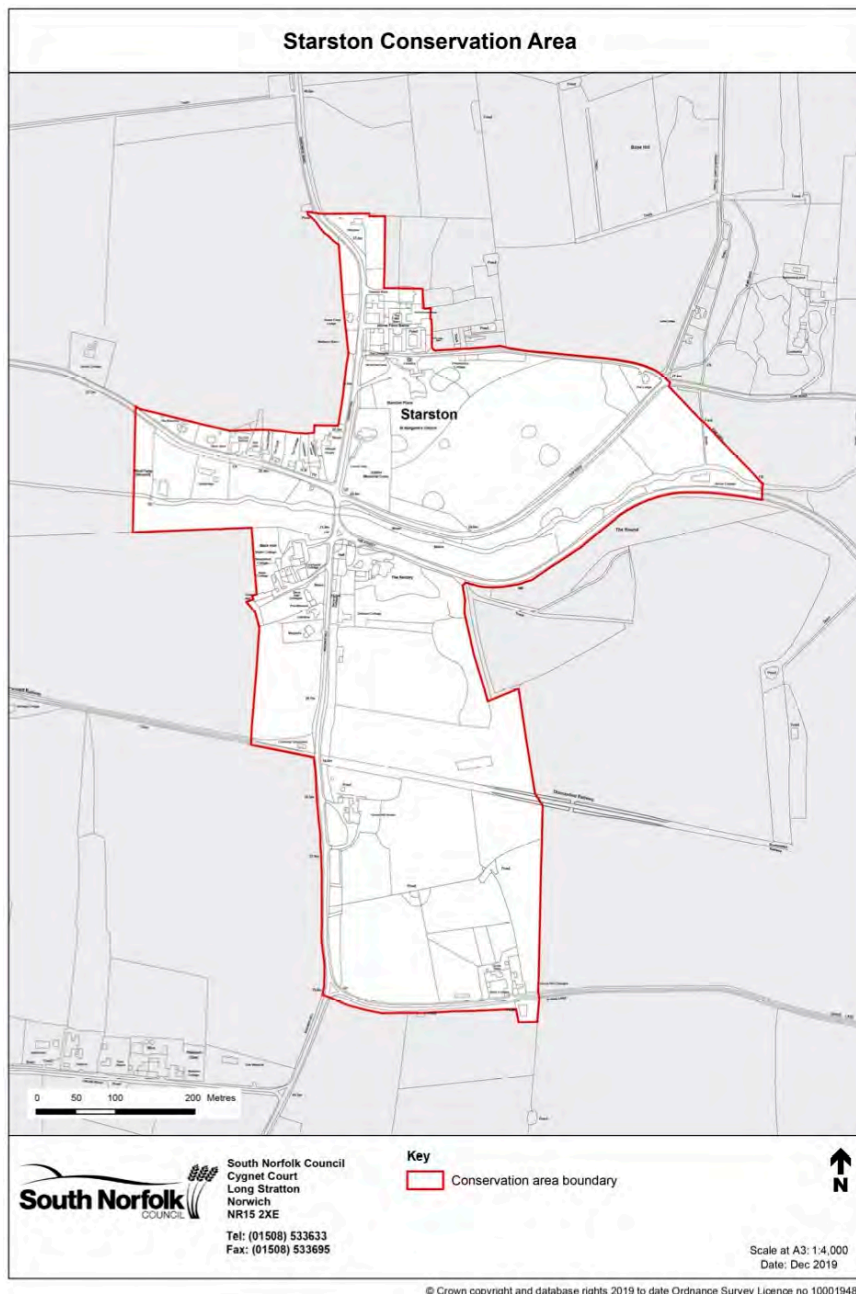


Figure 19: Starston Conservation Area, proposal map (source: South Norfolk Council, Starston Conservation Area Character Appraisal and Management Guidelines, December 2019).

²⁵ Starston Conservation Area Character Appraisal and Management Guidelines, December 2019, South Norfolk Council.

5.1.28 The Conservation Area is important to local people in terms of protecting the historic core of the village and overall character of the area, particularly given that the three settlement boundaries are within the Conservation Area (see figure 19). Regard should be given to the Starston Conservation Area Character Appraisal and Management Guidelines when submitting planning applications. Policy STA3 sets out particular policy requirements for development in the Conservation Area.

5.1.29 There is one Grade I listed building in Starston and 28 Grade II listed buildings and a scheduled monument.²⁶ The Grade I listed building is St. Margaret's Church, which stands in the centre of the village on Church Hill above the bridge and across the Beck from the Old Rectory. The scheduled monument is the wind pump, which also has a Grade II listing. Figures 20 and 21 show all the listed buildings in the parish. These form an important part of the character of the parish and are identified in the Character Appraisal (Appendix B).

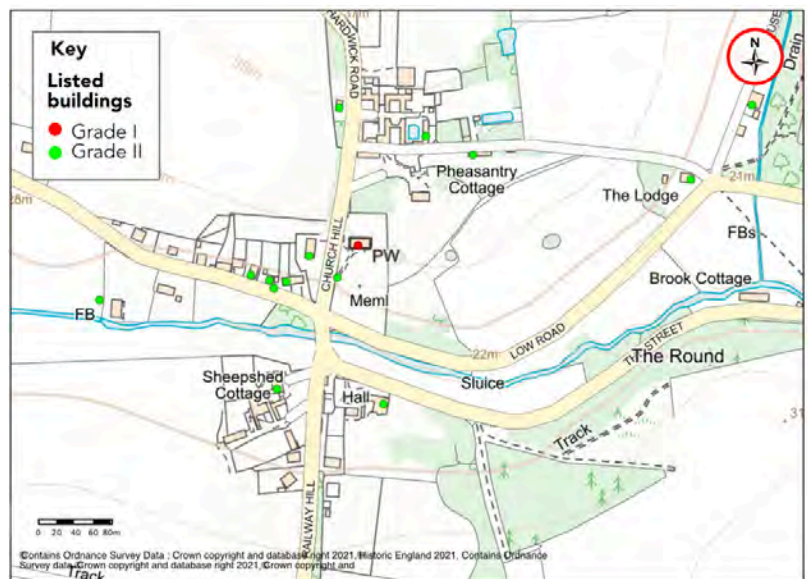


Figure 20 left: Listed buildings in Starston parish (source: Parish Online with own annotations). Blue line denotes parish boundary.

Figure 21 above: Listed buildings in the centre of Starston village (source: Parish Online with own annotations).

²⁶ <https://historicengland.org.uk/listing/the-list>, 09.11.2018.

5.1.30 Good design, that is both visually attractive and functional, stems from having an understanding of a development's setting and the character of the local area. This understanding can help to ensure that new development proposals are of an appropriate design; one that respects and complements the existing local character.²⁷ To add to the South Norfolk Council's Conservation Area Character Appraisal and Management Guidelines, the Neighbourhood Plan Steering Group has undertaken a Character Appraisal for the whole of the Starston parish. This can be found in Appendix B. This describes the distinct appearance and feel of the whole parish, broken down into broad character areas. It communicates the key physical features and characteristics that combine to give Starston its local distinctiveness and unique identity.

POLICY

STA3: Conservation Area and listed buildings

Development proposals within, or within the setting of, the Conservation Area should preserve or enhance its character and appearance, see Character Appraisal (Appendix B). Development proposals affecting listed buildings, or their setting, should preserve or enhance their special architectural or historic interest. In particular, proposals that assist in positively creating an attractive public realm and improving the quality and appearance of the Conservation Area, will be supported.

Where appropriate, development should incorporate the following:

- High quality materials, paving and landscaping, which reflect the local character, or are of innovative and sensitive contemporary design.
- Coordinated public realm, including signage, railings, litter bins, seating, bus shelters, bollards and cycle racks.

5.1.31 One stakeholder described Starston as 'a rural, spread out village, with a lovely heart comprised of the Jubilee Hall, meadow and stream.'²⁸

Throughout all the community engagement work undertaken in the preparation of the Neighbourhood Plan, there was an overwhelming appreciation of the character of the parish as it stands today.

5.1.32 There are some exceptionally interesting and attractive dwellings, which contribute to Starston's current village form. An early consultation comment

²⁷ How to prepare a character assessment to support design policy within a neighbourhood plan, Planning Aid.

²⁸ Stakeholder engagement – Councillor 21.02.19.

stated that they welcomed 'infill where suitable and safe for road access, so long as new buildings are sympathetically designed'.

5.1.33 It is the intention of STA4 to preserve and enhance the current built form of Starston, paying particular regard to the character, and keeping it a distinct settlement from elsewhere. One business owner stated that design should be 'in keeping with other houses in the village; other rural villages have new developments of square boxes that are not in keeping with the village'.²⁹ Another landowner stated, 'housing should look modern and balance cost with aesthetics, i.e. not large-scale development of square boxes'.³⁰

5.1.34 There is also some desire to use locally sourced building materials, although not a practical requirement of all new builds. One landowner stated, 'planning fails to better support small sympathetic developments using sustainable low carbon, locally sourced building materials, that would also help increase local employment, examples: straw bale, clay lump, rammed earth and thatched construction'.³¹

5.1.35 It should be noted that good design within Starston does not necessarily mean old or traditional in style. Innovative and sensitive contemporary design, with good justification, is encouraged within the parish.

5.1.36 An issue that repeatedly came up through consultation was that of heavy goods vehicles and large farm machinery not being able to easily pass along country roads unrestricted. Whilst this cannot be overcome for existing dwellings, the building of any new development should take this into consideration in the off-road parking arrangements for the property, and where possible have regard to the width of the road.

²⁹ Stakeholder engagement – local business 10.03.19.

³⁰ Stakeholder engagement – landowner 08.02.19.

³¹ Stakeholder engagement – local business 01.03.19.

STA4: Design of development

All new development within the parish must demonstrate high quality design, reinforcing local distinctiveness and not adversely impacting the rural character and appearance of Starston, as defined in the Character Appraisal (Appendix B). Design that fails to have regard to local context or does not preserve or enhance the character and quality of Starston will not be supported. This does not preclude innovative and sensitive contemporary design.

All new development should comply with the Starston Neighbourhood Plan Design Guidance and Code (see supplementary supporting document).



5.2 Environment and Landscape

5.2.1 South Norfolk Council's Landscape Character Assessment 2001 classifies Starston as Waveney Tributary Farmland. Any development in the area must respect the character of Waveney Tributary Farmland and in particular consider the following:

- Conserve the rural peaceful character, with the pattern of small villages and settlements set within the agricultural landscape, but not dominating it.
- Conserve the character and individual identity of the villages either set around greens or loosely following roads. Infilling or extension of settlements could result in a change to a more compact character and merging of settlement and loss of individual identity.
- Seek to maintain the soft grass verges and open frontages that characterise the settlements along rural roads and avoid creation of hard boundaries or surfaces which would impart a more urban character.
- Conserve village greens and commons.
- Conserve the local vernacular features that contribute to the rural character, including the distinctive road signs and road names. Conserve the quiet, rural character of the narrow lanes that cross the area.
- Consider potential effects of potential large-scale developments (for example relating to airfield sites).³²

5.2.2 A search by the Norfolk Biodiversity Information Service showed 2,290 finds of protected species in Starston parish. Any development will need to consider impact on the protected species. Lapwing, Grey Partridge and Turtle Dove are protected species found in Starston and are on the red list for

³² South Norfolk Rural Policy Area B4: Waveney Tributary Farmland, https://www.south-norfolk.gov.uk/sites/default/files/LUC_2001_RPA_B4_Waveney_Tributary.pdf, 09.07.19.

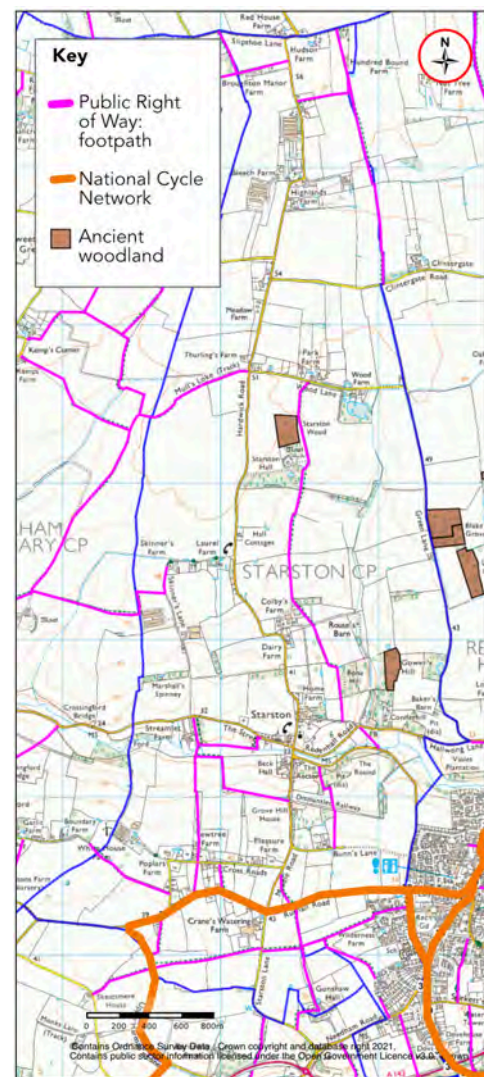
conservation. This means they are a species that needs urgent action for protection.³³

5.2.3 In a piece of consultation with young people, when asked what is special about Starston, the natural environment was deemed very important: 'Starston is made special as it is small and has lots of green space and greenery', and 'the best thing about Starston is the meadow. I like the trees and the bees.'³⁴

5.2.4 Starston has two areas of 'ancient woodland'. An ancient woodland is an area that has persisted since 1600, relatively undisturbed by human development. As a result, they are unique and complex communities of plants, fungi, insects and other micro-organisms³⁵, and therefore critical to maintaining the biodiversity found in Starston (figure 22).

5.2.5 Starston is served by a network of footpaths (Public Rights of Way) as well as informal routes, enabling residents to access the countryside. The National Cycle Network (route 30) also comes through the southern end of the parish (figure 22).

Figure 22: Public Rights of Way, the National Cycle Network and ancient woodland (source: Parish Online with own annotations). Blue line denotes parish boundary.



³³ www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/, 12.11.2018.

³⁴ Stakeholder consultation – Young people, 02.03.19.

³⁵ <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/ancient-woodland/>, 18.03.21.

Objective 3: To protect and enable access to the countryside.

- 5.2.6 There are a number of significant housing allocations outlined in the emerging Greater Norwich Local Plan for Harleston. It is therefore particularly important that, whilst Harleston expands, there is a policy to ensure further development does not encroach into Starston in the future. Initial consultation with the community brought out comments such as 'maintain Starston as a rural village', 'Starston to keep its own identity', 'buffer between Starston and Harleston' and 'keep Starston separate from Harleston'.
- 5.2.7 Strategic gaps help to protect the identity and character of separate settlements, giving a sense of leaving one place and arriving at another. In order for Starston to remain as a distinct settlement, it is necessary to protect a gap between the village and neighbouring Harleston. This should protect the open character and prevent the coalescence of settlements.
- 5.2.8 The strategic gap outlined in STA5 keeps the village and town settlements physically and visually distinct. This does not prevent all development but requires any new development to be sensitive to the location.

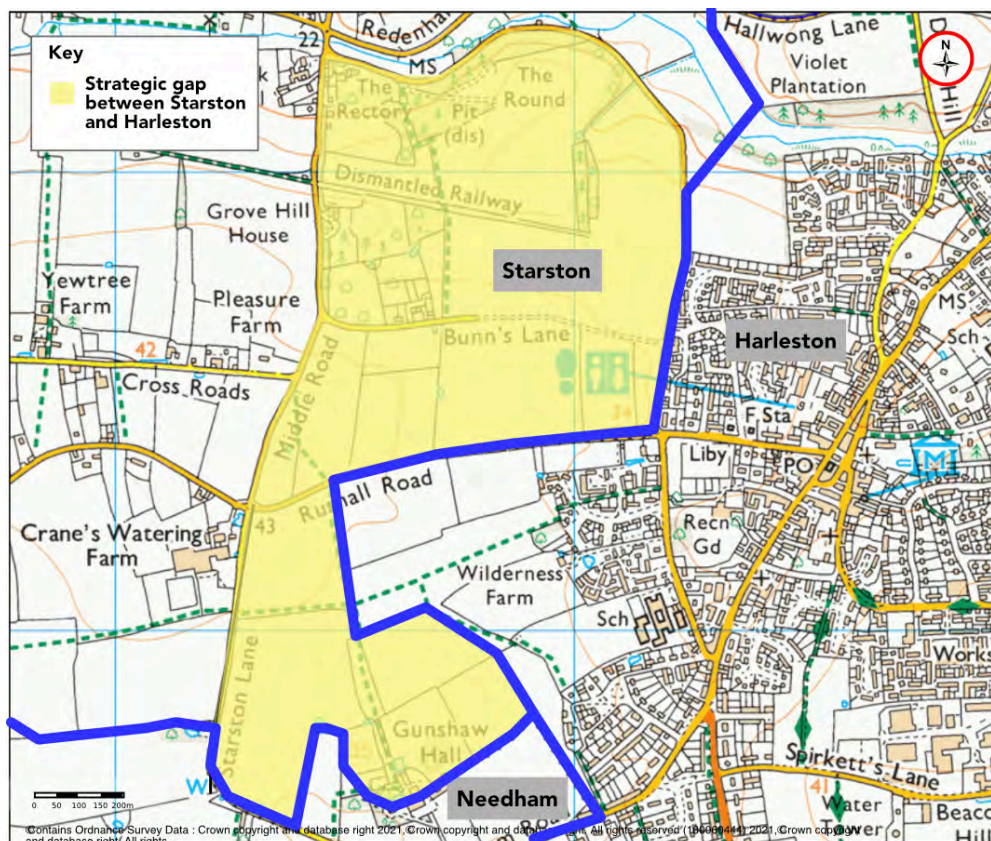


Figure 23: Strategic gap between Starston and Harleston (source: Parish Online with own annotations). Blue line denotes parish boundary.

STA5: Strategic gap

All development should respect and retain the generally open and undeveloped nature of the separation between Starston, the surrounding villages and Harleston town. In particular, there should be no significant development (as outlined in STA1) between Starston and Harleston, east of Starston Lane and Railway Hill/Middle Road (figure 23).

- 5.2.9 To safeguard the natural environment and character of Starston, the Steering Group has identified certain public views and vistas as being of particular importance to the community. These form the basis of the policy set out in STA6 below, and are in addition to the views identified in South Norfolk Council's Conservation Area Character Appraisal and Management Guidelines (figure 24).

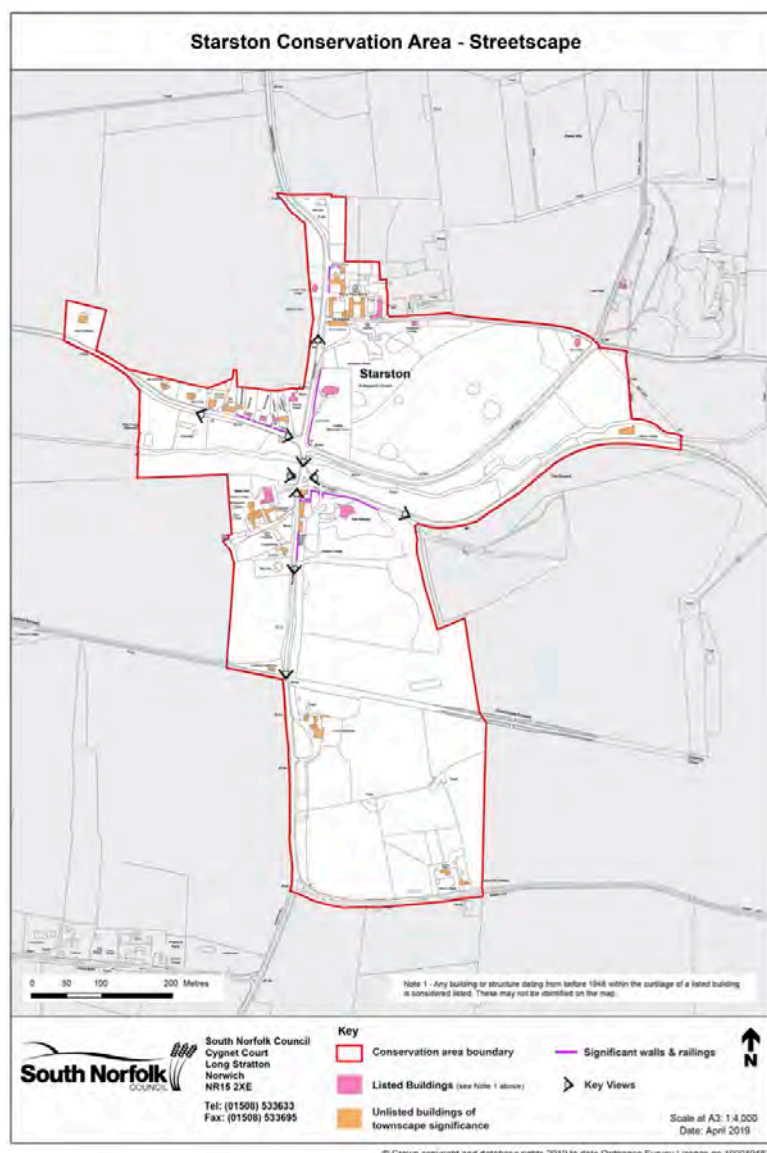


Figure 24: Starston Conservation Area Streetscape, showing key views (source: South Norfolk Conservation Area Character Appraisal and Management Guidelines, Appendix 5).

5.2.10 Description of the views identified in the Neighbourhood Plan as being of particular importance with the parish:

1. From The Street at the foot of Church Hill, looking towards the village sign, the Glebe Meadow, the Jubilee Hall and the Grade II listed Old Rectory. This viewing position is in the centre of the village, beside the bridge across the Beck.
2. From The Street outside Stone Cottage towards the wind pump. This viewing position provides a view of the pump in its rural context, but also offers a view of rising land from the Beck in the immediate hinterland of the village, with Railway Hill in the distance.
3. From just outside the southern entrance to the churchyard, looking west along The Street. This offers a view of the western part of The Street, showing houses along its north side. Among the houses, many of which are listed, are the former school, blacksmith and the public house/shop and post office. The view thus reflects the social history of the village.
4. From the stile on the Colby's Walk public right of way, looking south from the top of the first field above the lane. This is an important view from the north and is the first point where one has a clear sense of approaching the village and the valley of the Beck. The converted Home Farm barns can be seen on the right-hand side, and the Grade II Cart Lodge Barn is just visible beside a smallish area of wild green space.
5. Looking north-north-east from the former railway track approximately 285 metres west of Railway Hill. This offers a panoramic view across farmland towards the centre of the village and the rising land to the north of The Street.
6. From Railway Hill approximately 50 metres north of Cross Road, looking north towards the rising land to the north of The Street, showing Starston village nestling in the valley of the Beck.
7. From outside Hall Cottages, looking west towards the Pulhams. This is a classic 'big sky' view, with the Pulhams visible in the distance and Skinner's Lane on the left. Hardwick Road is the main route north from the centre of Starston. This, with Views 8 and 9, demonstrates the contrast between the landscape of the Beck valley and the higher ground north and south.
8. Looking south-west from Green Lane at the junction with Wood Lane, on the parish boundary. This looks back towards Hardwick Road and the village, across an attractive valley that leads south to the Beck.
9. South and west from the corner of Cross Road (near Brick Kiln Farm) towards Rushall.
10. From near the entrance to the Glebe Meadow opposite the Jubilee Hall, looking north across the Beck towards the tower of St. Margaret's Church.

The view shows a key local landmark and the verdant nature of the land rising north from the Beck.



Figure 25: photographs of each of the important public local views.

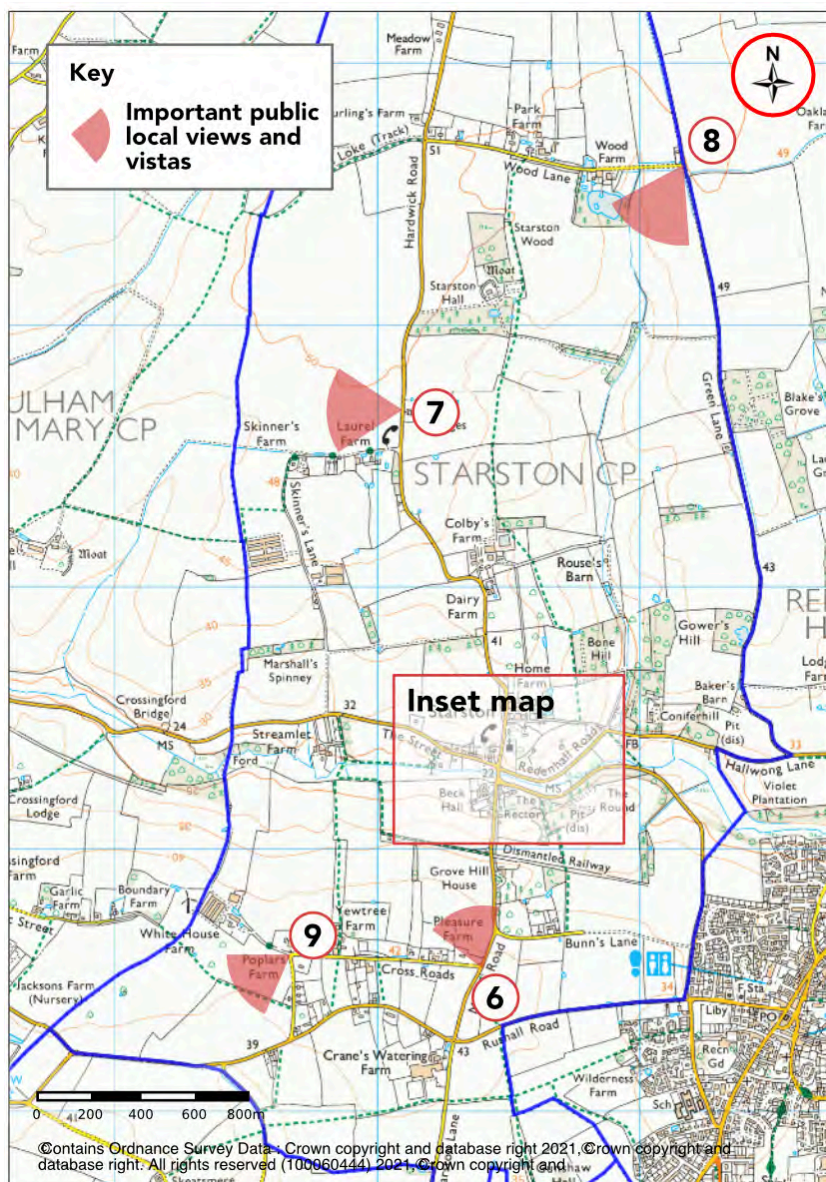


Figure 26: Important public local views and vistas. Blue line denotes parish boundary.

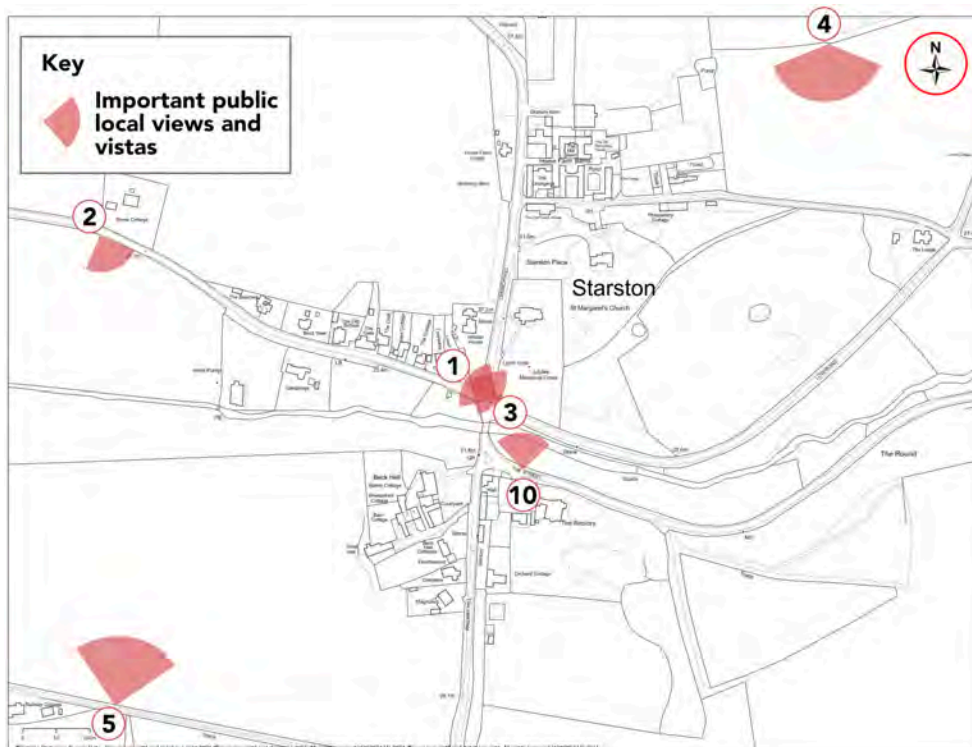


Figure 27: Inset map (source: Parish Online with own annotations).

STA6: Important public local views and vistas

The following are identified as important public local views and vistas (as shown in figure 25, 26 and 27):

1. From The Street at the foot of Church Hill looking towards the village sign, the Glebe Meadow, the Jubilee Hall and the Old Rectory.
2. From The Street outside Stone Cottage towards the wind pump.
3. From just outside the southern entrance to the churchyard looking west along The Street.
4. From the stile on Colby's Walk (Public Right of Way) looking south from the top of the first field above the lane.
5. Looking north to north-east from the former railway track approximately 285 metres west of Railway Hill.
6. From Railway Hill approximately 50 metres north of Cross Road, looking north across to the rising land to the north of The Street.
7. From outside Hall Cottages, looking west towards the Pulhams.
8. Looking south-west from Green Lane at the junction with Wood Lane, on the parish boundary.
9. Looking south and west from the corner of Cross Road (near Brick Kiln Farm) towards Rushall.
10. From near the entrance to the Glebe Meadow (Local Green Space 1) opposite the Jubilee Hall, looking north across the Beck towards the tower of the Grade I St. Margaret's Church.

Development proposals that might affect an identified important public local view or vista should ensure that they respect and take account of the view or vista concerned. Development which is overly prominent and/or would have an unacceptable or adverse impact on the landscape or character of the view or vista will not be supported.

5.2.11 South Norfolk Council requires 2.4ha of informal recreation space per 1,000 population. Informal recreation space is recognised as being a critical element of the overall open space provision and can play a vital role in meeting the casual recreational and amenity needs of local residents, boosting health and wellbeing and providing an important function in enhancing the biodiversity of the district.³⁶ Informal recreation space is

³⁶ South Norfolk Council, Guidelines for recreation provision in new residential developments, Supplementary Planning Document, September 2018.

important to Starston residents both for its amenity value and to ensure the natural environment and character of the village is safeguarded.

5.2.12 The Neighbourhood Plan has the opportunity to designate areas as 'Local Green Space' for special protection, (i.e. where the community is able to rule out new development other than in very special circumstances, for example, for reasonable expansion of the existing facilities to meet growing needs). The list in policy STA7 has come about through community consultation and is in conformity with the National Planning Policy Framework (paragraphs 101-103), whereby the designation of Local Green Spaces should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

5.2.13 The identified Local Green Spaces for Starston give the village its rural and green feel, critical to the character of the village. A justification and further maps for each of the proposed Local Green Spaces are to be found in Appendix C. In accordance with the Environmental Bill (2020), biodiversity net gain and the expansion of current ecological networks is strongly welcomed.

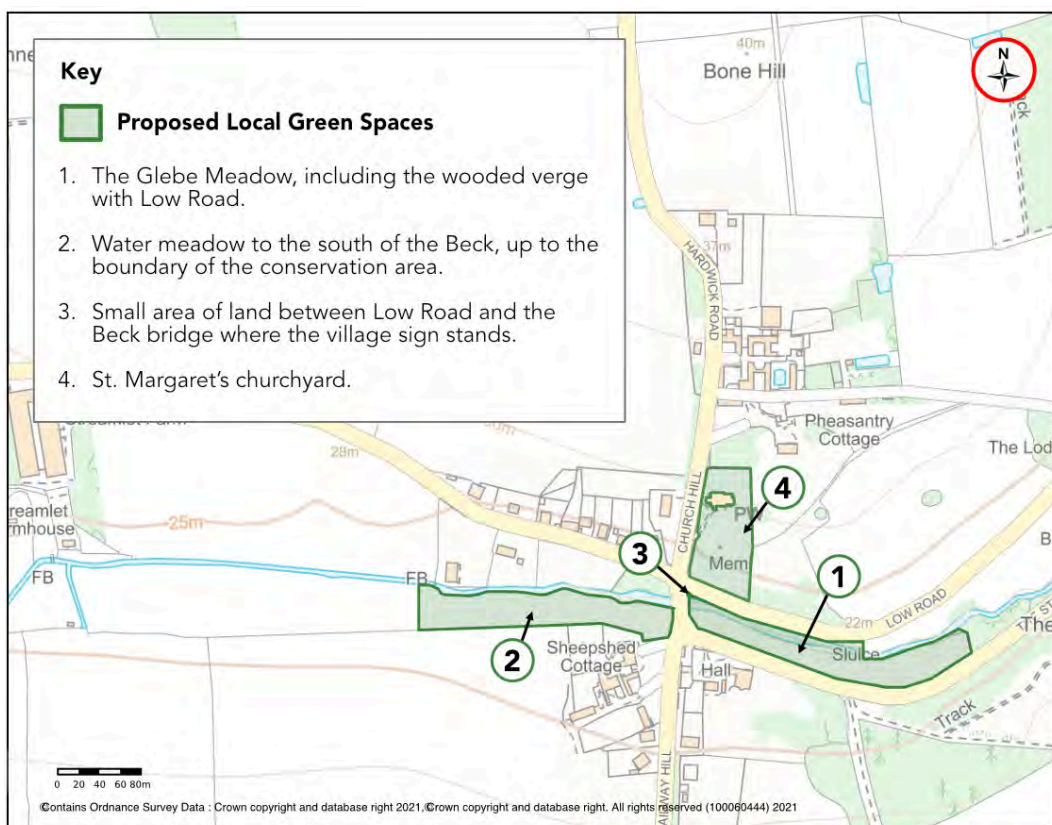


Figure 28:
Proposed
Local Green
Spaces
(source:
Parish Online
with own
annotations).

STA7: Local Green Spaces

The following areas are designated as Local Green Spaces for special protection (as shown in figure 28):

1. The Glebe Meadow, including the wooded verge with Low Road.
2. Water meadow to the south of the Beck, up to the boundary of the Conservation Area.
3. Small area of land between Low Road and the Beck bridge where the village sign stands.
4. St. Margaret's churchyard.

These Local Green Spaces are protected in accordance with paragraphs 100 and 101 of the National Planning Policy Framework. Development on a designated Local Green Space will only be supported in very exceptional circumstances, for example where the harm resulting from the proposal is significantly outweighed by other considerations. Development on or adjacent to a Local Green Space that would adversely impact upon its special qualities will not be supported.

Proposals for the enhancement of Local Green Spaces will be encouraged where they lead to further ecological networks and biodiversity net gain.

5.2.14 One of the special features of Starston is the Beck, a stream that runs through the parish, with four individual sluices. The Beck is prone to flooding. Figure 29 shows the extent of the 'Flood Alert Area', the geographical area where it is possible for flooding to occur.

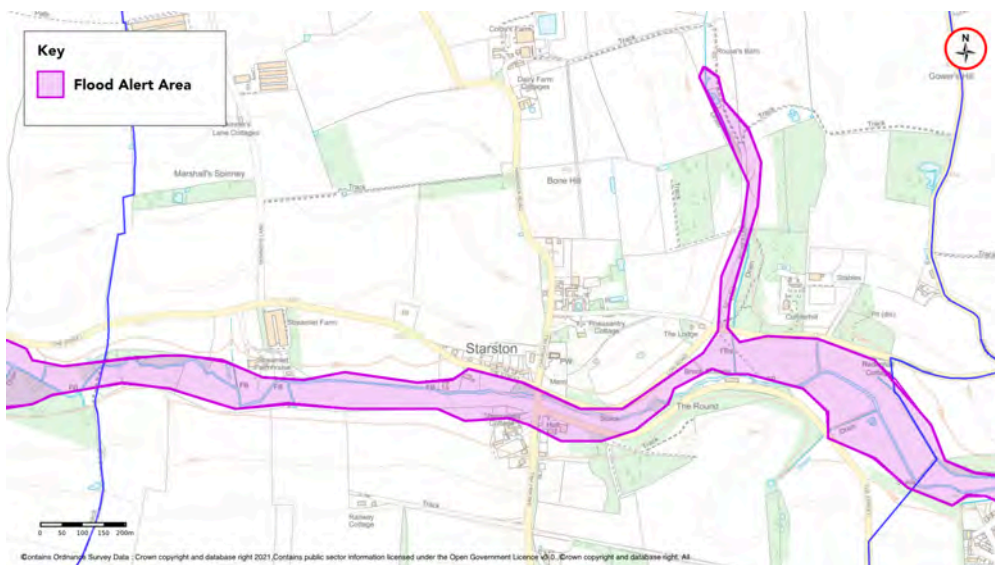


Figure 29: Flood Alert Area through Starston (source: Parish Online with own annotations). Blue line denotes parish boundary.

5.2.15 There are a number of locations within the parish where localised surface water drainage is an issue. In some locations localised flooding can occur during periods of modest and heavy rainfall, particularly those identified in policy STA8. The list has been established through local knowledge, experience and consultation with residents. In the face of climate change, the risk of surface water drainage issues is liable to increase.

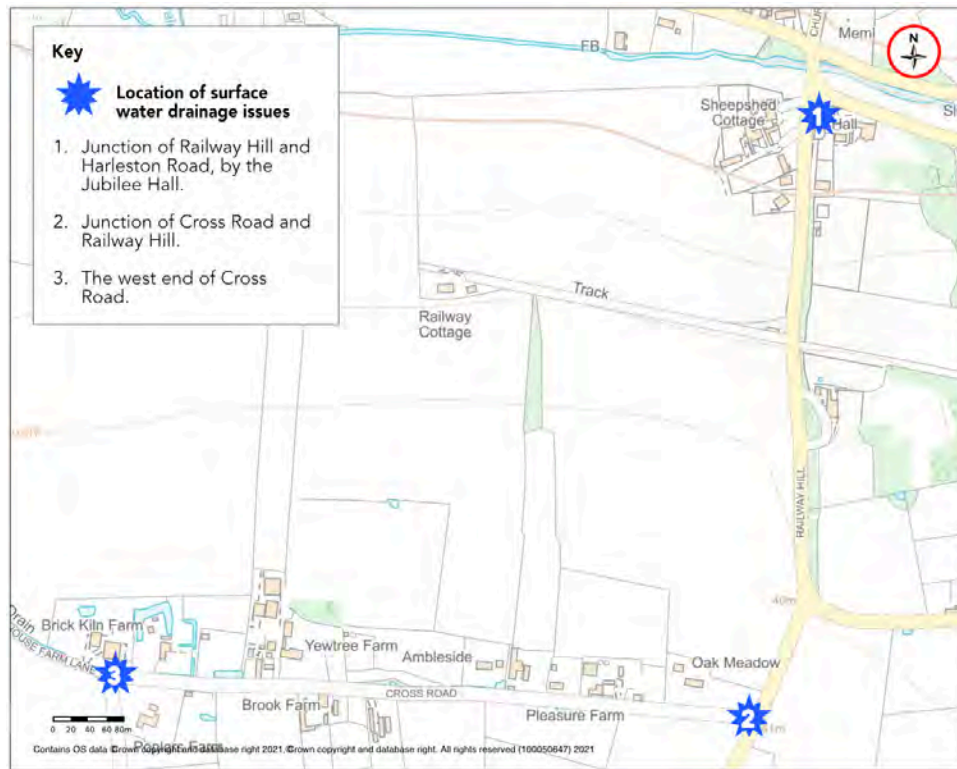


Figure 30: Location of surface water drainage issues (source: Parish Online with own annotations).

POLICY

STA8: Surface water drainage

There are a number of locations that have surface water drainage issues. The following locations within the parish (figure 30) are identified as localised flooding areas:

1. Junction of Railway Hill and Harleston Road, by the Jubilee Hall.
2. Junction of Cross Road and Railway Hill.
3. The west end of Cross Road.

Development proposals within the immediate locality of any of the localised flooding areas should use appropriate drainage methods to prevent, and where appropriate, alleviate the localised flooding. Future development must not cause or contribute to new flooding or drainage issues, exacerbate existing issues, or cause water pollution, and should mitigate its own flooding and drainage impacts.



5.3 Business and Employment

- 5.3.1 Data from the 2011 Census shows that of residents aged 16 to 74 years old, 72.2 per cent are economically active. Of the economically active residents aged 16 to 74 years old, 16.1 per cent of residents are in part-time employment, 27.4 per cent of residents are in full-time employment and 25.4 per cent of residents are self-employed. 2.4 per cent of residents are unemployed and 0.8 per cent are full-time students.
- 5.3.2 Of the 27.8 per cent of economically inactive residents, 13.7 per cent are retired, compared to 17.9 per cent for Norfolk, 4.4 per cent are students, 4 per cent are looking after family, 2.4 per cent are long-term sick or disabled and 3.2 per cent fall into the category 'other'.
- 5.3.3 Occupation data from the 2011 Census, shows that residents aged 16 to 74 years old, 19.7 per cent are managers, directors and senior officials, 17.3 per cent are in professional occupations, 11 per cent are associate professional and technical occupations, 6.4 per cent are administrative and secretarial occupations, 16.2 per cent are skilled trades occupations, 12.7 per cent are caring, leisure and other service occupations, 6.9 per cent are sales and customer service occupations, 3.5 per cent are process plant and machine operatives and 6.4 per cent are in elementary occupations.
- 5.3.4 There is anecdotal evidence from residents to suggest that a significant number of people run businesses from home and work from home through the week. This is likely to have further increased during the COVID-19 national lockdown and restrictions. It is expected that the pandemic will change working patterns longer term.
- 5.3.5 There is a general desire to promote sustainable, diverse and adaptable agriculture sectors where farming achieves high environmental standards, minimising impact on natural resources, and manages valued landscapes and biodiversity; contributes both directly and indirectly to rural economic

diversity; is itself competitive and profitable; and provides high quality products that the public wants.

Objective 4: To encourage and support new and existing businesses.

- 5.3.6 In order to continue being a vibrant rural parish where people of all ages choose to live, it is important that new business and employment opportunities are supported. Policy STA10 sets out support that the planning system can give to business and employment opportunities in Starston.
- 5.3.7 'Better broadband' came through as a strong issue for businesses in the initial community consultation and stakeholder engagement sessions. At the time of writing there are areas of the village that have a particularly poor connection, but 'fibre to the door' is due to be implemented across the parish in 2021. Some small businesses use the public Wi-Fi provided at the Jubilee Hall when internet connection is poor.
- 5.3.8 Taking into account mitigation measures regarding climate change, the design of any new business infrastructure should also, where possible, incorporate electric car charging points, solar energy initiatives and rainwater harvesting, thus leading the way in environmental responsibility.

STA9: Business development

The following new developments will be supported to encourage business and employment opportunities, provided that they are appropriate both in design and environmental impact, and do not have an unacceptably adverse impact on the road network:

- Proposals, including extensions, that enable home working.
- The redevelopment of redundant farm buildings for employment use.
- Proposals for the development of businesses related to agriculture or horticulture.

Compliance with the Design Guidance and Codes (supplementary supporting document) is expected.

The following should be incorporated into the design of business and employment units, where possible:

- High speed broadband.
- Electric car charging points.
- Low carbon technologies for heating and energy sources.
- Rainwater harvesting.



6. Community action projects

- 6.1 Through the community engagement activities undertaken as part of the Starston Neighbourhood Plan, the local community identified a number of projects that fall outside the remit of planning policy. These have been listed as 'community action projects'.
- 6.2 It should be noted that as a direct result of the Neighbourhood Plan consultation, a permissive path has been established on the field edge running parallel to Railway Hill. This path is now walked daily by residents, as an alternative to walking in the road.
- 6.3 Community action projects will be addressed outside the Neighbourhood Plan process. Projects are only included here for topics that are relevant to the Neighbourhood Plan and should not be considered an exhaustive list. Over the lifetime of the Neighbourhood Plan, Starston Parish Council may also develop a range of projects as a result of, and independent of, new development.

Community action projects

- Continue to investigate the potential for the following permissive paths:
 - Railway Hill, linking to Cross Road.
 - Linking the centre of Starston to Pulham St. Mary.
 - The water meadow south of the Beck.
- Work with Highways to introduce traffic calming measures and restrict large vehicles going through the village where possible.
- Work with neighbouring parishes to ensure gaps between settlements remain in accordance with STA5.
- Investigate local interest and practicalities of a low-carbon community power generation/water provision project.
- Further tree/hedge planting.



7. Implementation

Delivery of policies and projects

- 7.1 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, to ensure that when land is developed, it comes with the necessary infrastructure to support it, such as schools, public transport and leisure facilities. CIL allows South Norfolk Council to raise funds from developers and individuals who are undertaking building projects to support growth in the area.
- 7.2 Within South Norfolk district the following types of development are liable for CIL:
- All development of 100sqm or more of new build, or extensions to existing buildings.
 - All development regardless of size that results in the creation of a new dwelling.
 - Agricultural buildings and storage warehouses that people enter into.
 - The conversion of a building that is no longer in lawful use.³⁷
- 7.3 15 per cent of CIL contributions are passed directly to the Parish Council to be spent on local priorities. Once the Neighbourhood Plan is in place, Starston Parish Council will benefit from 25 per cent of the levy revenues arising from development that takes place in Starston.
- 7.4 Where appropriate and possible, Starston Parish Council will use CIL as well as working with agencies and neighbouring Parish Councils to deliver local priorities.

Monitoring the use of the Neighbourhood Plan

- 7.5 It is important to note that further development is likely to take place during the Neighbourhood Plan period 2022-2042. Each development will differ and will need to consider the Neighbourhood Plan policies as they stand. It will be the role of the South Norfolk Council and Starston Parish Council to

³⁷ <https://www.south-norfolk.gov.uk/residents/planning-and-building/community-infrastructure-levy>, 08.07.19

promote and monitor the use of the Neighbourhood Plan for all planning applications.

Updates to the Neighbourhood Plan

- 7.6 The Neighbourhood Plan spans a period of 20 years; it is likely to need reviewing within that timeframe. It will be the role of the Parish Council to update the Neighbourhood Plan at an appropriate time. At the time of writing, many of the first Neighbourhood Plans in the country are starting to be revisited.

Appendix

Appendix A: Neighbourhood Plan Steering Group members

The Starston Neighbourhood Plan Steering Group has included the following members, many of whom have served from the beginning of the process in 2018 to its conclusion:

- **Janet Broadhurst**, Parish Councillor
- **Sam Carter**, Former Parish Councillor
- **Chris Doughty**, Parishioner
- **Auriel Gibson**, Parishioner (Chair of the Neighbourhood Plan Steering Group until pre-submission consultation)
- **Patrick Gray**, Former Parishioner
- **Peter Grimble**, Parishioner
- **Ann Leitch**, Parish Councillor (former Chair of the Parish Council and first Chair of the Neighbourhood Plan Steering Group)
- **Kevin Murphy**, Parishioner
- **Karen O’Keeffe**, Parishioner

Supported by

- **Libby Alexander** – Parish Clerk
- **Clare Crane** – Former Parish Clerk
- **Emma Harrison** – Independent consultant for the Sustainability Appraisal
- **Rachel Leggett** – Project Manager and principal independent consultant for the Neighbourhood Plan

Appendix B: Starston village character appraisal

Below is a map and a description of distinct character areas within Starston, produced by the Neighbourhood Plan Steering Group.

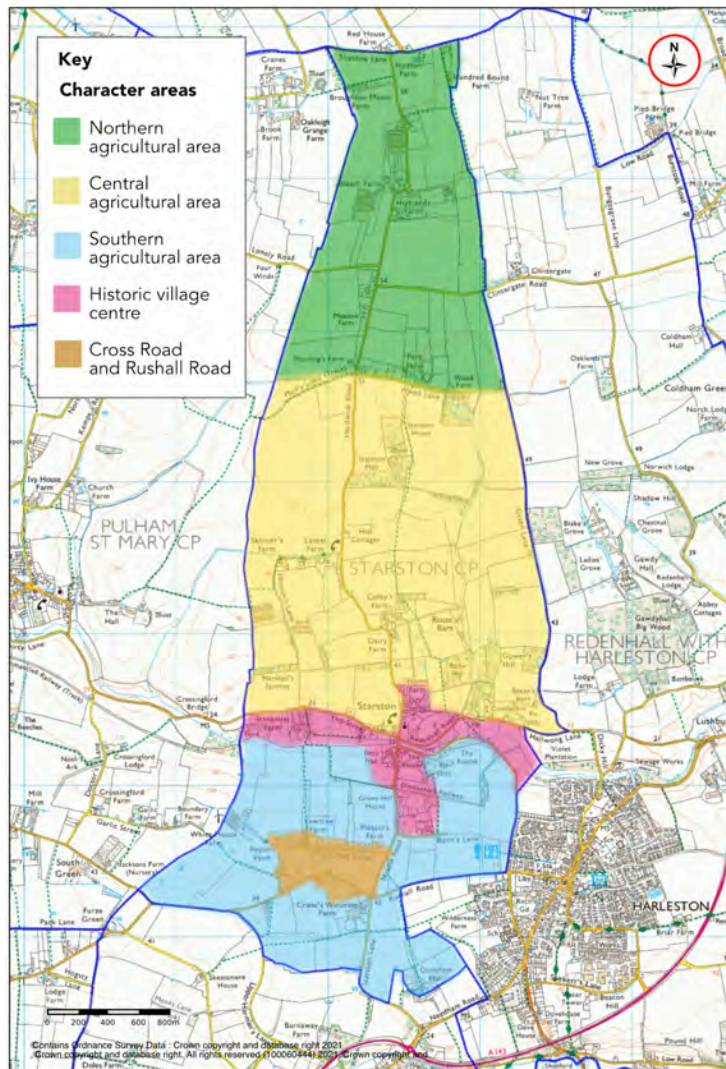


Figure 31: Character areas (source: Parish Online). Blue line denotes parish boundary.

1. Northern agricultural area

The highest part of the village lies fairly flat, with prominent trees and hedges around largely arable land but with some grassland. There are two intensive livestock units (poultry and pigs). Field size varies and there are some open views. Housing is from 17-20th century and is generally scattered, with a small group in Wood Lane.

2. Central agricultural area

Big views predominate, with large field size mainly in arable use in the northern part and smaller, more undulating fields nearer the Beck. Land slopes generally to the Beck in the south, and gently to a discrete valley stream in the eastern part.

Woodland is diverse, with two blocks of ancient woodland, and some notable conifers to the south. A County Wildlife Site is designated on Gower's Hill. Lanes are largely tree lined. Includes an intensive poultry unit. Housing, typically ranging from 17-20th century, is generally scattered, with a small group in Skinner's Lane. Includes former farmsteads, some in residential or previous business use.

3. Southern agricultural area

Land slopes increasingly towards the Beck to the north and down towards the Waveney in the south, with extensive views. Predominantly in arable farming, with blocks of woodland near the village centre. This part of the village borders Harleston's housing areas in the south-east. There is an intensive poultry unit and a significant dairy unit with its associated grassland. Housing, typically ranging from 17-20th century origins, is generally scattered.

4. Historic village centre

Comprises the village Conservation Area and the valley of the Beck. The winding valley includes the east-west road from Harleston to the Pulhams, which meets the north-south Church Hill and Railway Hill by the road bridge over the Beck in the village centre. This is the location of the village sign. The historic village centre also accommodates St. Margaret's Church and the Jubilee Hall, and alongside the Beck the valued the Glebe Meadow, which includes an orchard of 26 different species of fruit tree planted by members of the community to mark the Queen's Diamond Jubilee in 2012. The village centre is the heart of Starston, with enticing views from all the wooded approach roads which converge in the valley, including of the emblematic wind pump, a scheduled monument and Grade II listed feature. There are some notable historic houses and a number of listed buildings, typically dating from 17-20th centuries, with a ribbon of dwellings along The Street and up Railway Hill. The Barns is a 21st century conversion of former farm buildings retaining their traditional brick and flint construction in a compact group to the north of the church.

5. Cross Road and Rushall Road

Relatively high ground with extensive views, especially to the south into Suffolk. The main housing group in the south of the village comprises largely 17-20th century properties in an open and spacious setting. Houses include bungalows alongside historic properties, with some more modern conversions and extensions and a number of former farmsteads now in residential use. Field size is smaller with a mix of grassland and arable, lined with hedges and trees. Cross Road is a quiet, narrow and tree-lined lane, while Rushall Road is more open and links Harleston with Dickleburgh and the Pulhams. Predominantly residential with a set of business premises in former farmsteads in Cross Road and at the east end of Rushall Road.

Appendix C: Local Green Space justification

The tables below outline justification for the inclusion of each Local Green Space identified. The criteria are based on paragraph 100 of the National Planning Policy Framework (February 2019).

1. The Glebe Meadow, including the wooded verge with Low Road	
Description: <ul style="list-style-type: none"> The Glebe Meadow is a 0.8-hectare community meadow located between Low Road and Harleston Road, with Starston Beck flowing through from west to east. It is central to the village and at the heart of the community. It is managed by volunteers who mow part of the meadow while the remainder is cut for hay annually. It is fenced to make it safe for families and dogs. This former grazing meadow was transferred into community ownership for use as amenity land in 2012 following major village fundraising. The Starston Jubilee Hall Trust owns and manages the meadow on behalf of the village. A footbridge and a stile were introduced to link with a public right of way. A traditional orchard was established with each tree planted by a different family to encourage a sense of ownership. Bird and bat boxes were assembled by children and beehives are managed by the Starston Bee Group. Seating is provided beside the Beck and in the orchard. It is well used by people from Starston, and from Harleston and other villages. Footfall is estimated to be around 5,000 per year. The meadow is also used for village events and community activities. The Glebe Meadow has won community awards (CPRE Green Spaces Award 2012, and a Volunteer Group Award from South Norfolk Council). The Glebe Meadow forms part of the key characteristics identified in the Starston Conservation Area Character Appraisal (2019). 	
In reasonably close proximity to the community it serves	The Glebe Meadow is central to the village, between St. Margaret's Church and the Jubilee Hall. It stretches east from the bridge and is bounded on the north by the Beck and trees lining Low Road and to the south by the hedge on Harleston Road.
Demonstrably special to a local community and holds a particular local significance	<ul style="list-style-type: none"> Lying at the heart of the village, the Glebe Meadow defines the character of Starston, an attractive green vista from The Street and the bridge. Historic significance – in the heart of the Conservation Area, formerly church-owned glebe land, situated between the church and the Old Rectory. The meadow is overlooked by the Grade I listed St. Margaret's Church and is adjacent to other listed buildings (The Old Rectory and

	<p>Beck Hall).</p> <ul style="list-style-type: none"> • Recreational value – used for informal recreation throughout the year. Also for organised events, such as dog shows, teddy bears picnics, firework displays and youth club activities. The Glebe Meadow draws people together from the whole village and beyond, and encourages local volunteering. Volunteers hold regular maintenance days to carry out tasks required to take care of the meadow. • Tranquillity – there are seats on the meadow. It is used locally for walking, watching wildlife and as a quiet place to relax and reflect. • Richness of wildlife – the diverse habitats of meadow, woodland and Beck encourage a wealth of wildlife. There are a number of bird and bat boxes made by volunteers and a kestrel box by the Thornham Owl Project. Egrets and kingfishers are also seen.
Local in character and is not an extensive tract of land	The Glebe Meadow is 0.8 ha and is central to Starston's rural identity.



Figure 32: The Glebe Meadow.



Figure 33: Local Green Space 1 (source: Parish Online with own annotations).

2. Water meadow to the south of the Beck

Description:

- The water meadow is a privately owned field located south of the Beck and immediately upstream from the Glebe Meadow. It is centrally situated in the village, and sits in a shallow valley setting, overlooked from both sides, including the approaches from the Pulhams and Harleston, and from the footpath and former railway line by Crossing Gates.
- This Local Green Space is the eastern end of a larger meadow. It amounts to approximately 0.8ha and lies wholly within the Conservation Area. Its boundary to the west follows the Conservation Area boundary which crosses this meadow close to the wind pump on the northern bank. (The whole field amounts to around 3.1ha).
- Being part of an open landscape, views of this meadow are regarded as special from several parts of the village. The Beck flows west to east along its length.
- This water meadow, which is prone to flooding, is managed grassland set between mature hedges to the south and the Beck on the north side with associated bankside vegetation
- It enjoys (currently informal) permissive public access and links with other rights of way to the south and west.
- The water meadow forms part of the key characteristics identified in the Starston Conservation Area Character Appraisal (December 2019).

In reasonably close proximity to

- The water meadow is in the centre of Starston, giving an important green and rural setting to the village. Houses on

the community it serves	<p>The Street look out onto this part of the meadow.</p> <ul style="list-style-type: none"> It is also viewed directly by residents, pedestrians and passing traffic approaching from the Harleston direction, and by pedestrians on The Street.
Demonstrably special to a local community and holds a particular local significance	<ul style="list-style-type: none"> Beauty – the grassland provides a stunning setting within the village. There are a number of trees in the field boundaries. The Beck provides the northern boundary. Historic significance – it lies in the heart of the Conservation Area. It has been an unchanged water meadow for many centuries and is the setting for the wind pump (Grade 11 listed and Scheduled Monument) across the Beck. Recreational value – the area is regularly used by walkers and stretches from the village centre, by the bridge and the Jubilee Hall, to link with other rights of way. Tranquillity – the meadow is peaceful, away from roads and bordered by a hedgerow and the Beck. Richness of wildlife – barn owls hunt in this meadow. Kingfishers are regular visitors and egrets have been seen here. Otters have been present in the past.
Local in character and is not an extensive tract of land	<p>This eastern part of the water meadow amounts to 0.8 ha within the Conservation Area and lies at the heart of the village. It is a critical part of the rural nature of the parish.</p>



Figure 34: Water meadow.

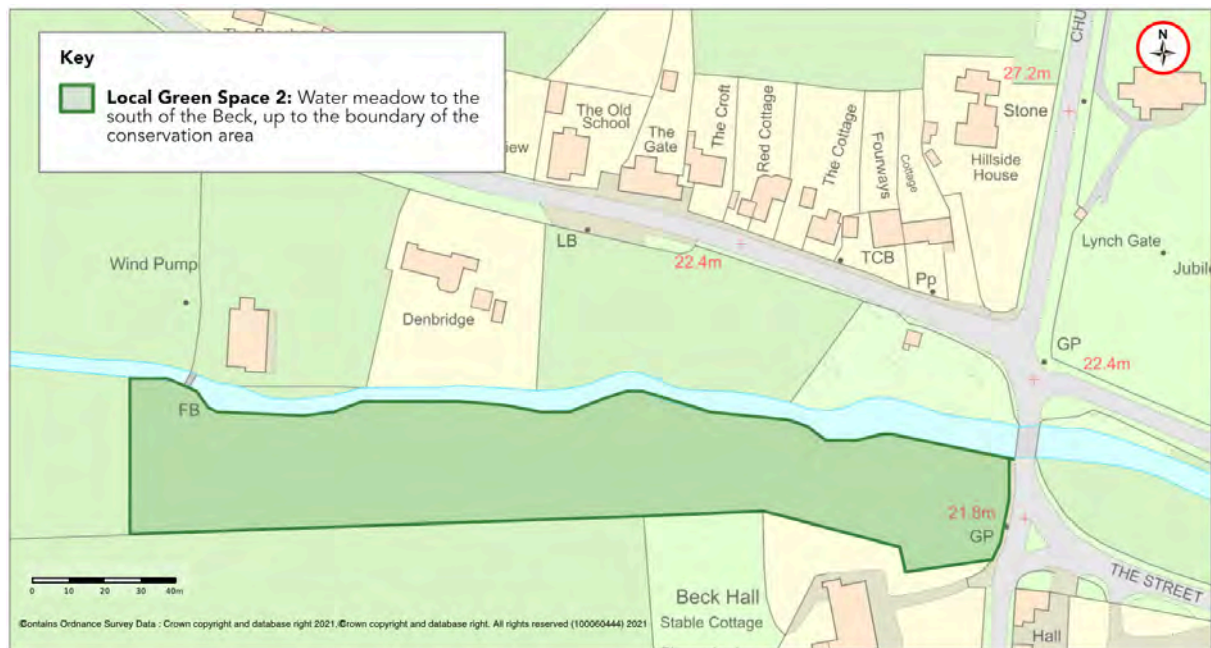


Figure 35: Local Green Space 2 (source: Parish Online with own annotations).

3. Small area of land between Low Road and the Beck bridge where the village sign stands

Description:

- Small grass verge area of approximately 45m² owned by the Parish Council.
- Site of the iconic village sign which defines the centre of Starston.
- In a prominent position in the village beside a crossroads and next to the bridge; a key part of the identity of Starston.

In reasonably close proximity to the community it serves	Central to the village, adjoins the main bridge over the Beck and adjacent to the Glebe Meadow.
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Demonstrably special to a local community and holds a particular local significance	Historic significance – in the centre of the Conservation Area, this has been the site of the present village sign since 1980.
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Local in character and is not an extensive tract of land	A small but vital green space.
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Figure 36: Village sign land.

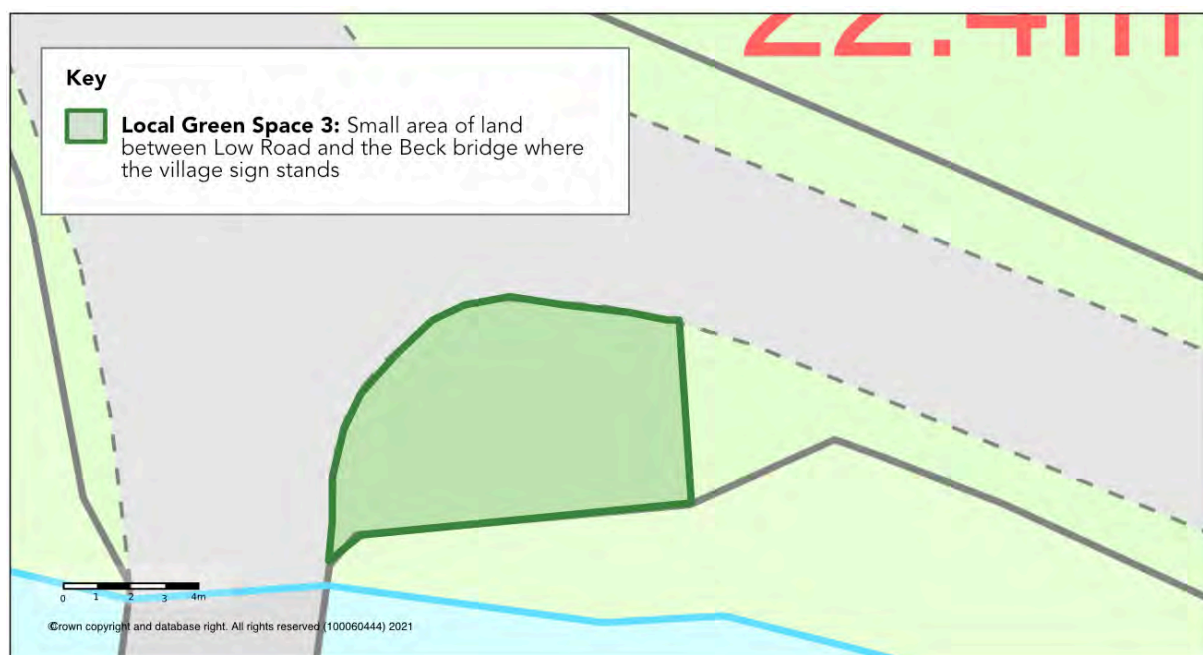


Figure 37: Local Green Space 3 (source: Parish Online with own annotations).

4. St. Margaret's churchyard

In reasonably close proximity to the community it serves

The churchyard is in the heart of the village on the east side of Church Hill. It has a commanding presence and looks out over the Beck and the Glebe Meadow towards the Jubilee Hall and the Old Rectory.

Demonstrably special to a local community and holds a particular local significance

The churchyard surrounds St. Margaret's Church, which was mainly built in the 14th and 15th centuries, with evidence of even earlier origins. The churchyard is visited by everyone attending services in the church and is used for burials of Starston parishioners. It can be viewed from the Glebe Meadow, as well as from The Street, Church Hill and Low Road. Maintenance of the churchyard is carried out sensitively to protect wildlife habitats with part managed as a conservation area.

Local in character
and is not an
extensive tract of
land

The churchyard sits in the village centre and extends to approximately 0.72 ha.



Figure 38: St. Margaret's churchyard.

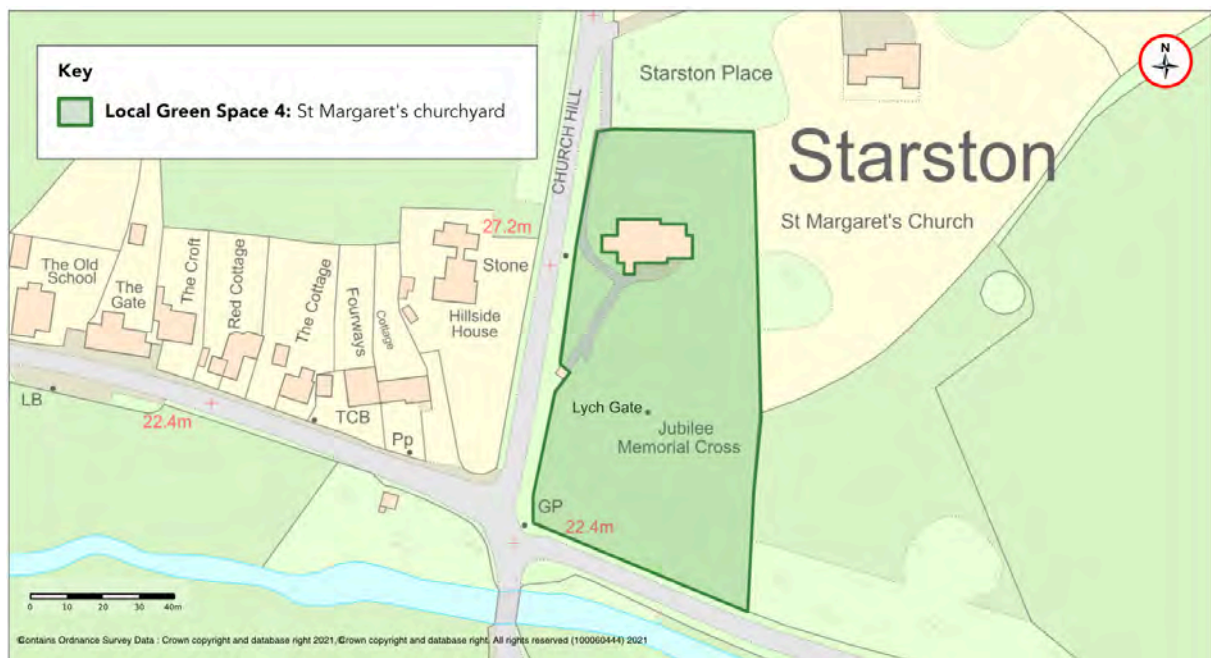


Figure 39: Local Green Space 4 (source: Parish Online with own annotations).

Appendix D: Glossary

Glossary of terms used and/or relevant to the Starston Neighbourhood Plan and supporting submission documents. Definitions are taken directly from the glossary of the National Planning Policy Framework July 2018, page 64.

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20per cent below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of Plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing:** is that sold at a discount of at least 20per cent below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20per cent below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Build to Rent: Purpose built housing that is typically 100 per cent rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Environmental impact assessment: A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Lifetime home: ‘lifetime homes’, allowing older people to stay in their own homes for longer, reducing the need for home adaptations and giving greater choice to people with disabilities who cannot achieve independent living due to lack of suitable housing.³⁸

Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.

³⁸ Taken from the definition of Lifetime Homes, https://www.designingbuildings.co.uk/wiki/Lifetime_homes, extracted 17.03.21.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Strategic environmental assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic policies: Policies and site allocations, which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Strategic policy-making authorities: Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.



Starston Neighbourhood Plan

South Norfolk Council Reg.16 Consultation Response

Section	Response
STA1 Location and scale of residential development – exception policy	<p>At the Reg.14 stage South Norfolk Council raised concerns that this policy conflicts with current South Norfolk policy (DM1.3 – Sustainable Location of New Development) and the emerging GNLP Policy 7.5, in particular the sentence ‘To protect the dispersed and spatial character of the village, new development should not take the form of an extension to an existing settlement boundary and should avoid altering the defined extent of the village core and its setting in open countryside.’ In response to this, the Neighbourhood Plan Consultation Statement states that this policy goes beyond emerging GNLP policy 7.5. Whilst this might be true in terms of numbers, given that the GNLP policy permits small scale residential development adjacent to the development boundary, the Council still believes there is a conflict. Part 1 of the emerging GNLP is a strategy document. Policy 7.5. is therefore to be considered strategic and, as an emerging Local Plan policy, a material consideration for the Neighbourhood Plan. Moreover, whilst this is an emerging policy, if the GNLP were to be adopted after the Neighbourhood Plan then we would expect that decisions on planning applications would be resolved in favour of the more recently adopted strategic policy, in line with NPPF paragraph 30.</p> <p>There is an inconsistency between the policy wording, within the second paragraph, and the supporting text in paragraph 5.1.22. The policy states, ‘Up to 10 dwellings will be supported across the parish in the lifetime of the Plan.’ However, paragraph 5.1.22 still states, ‘...up to 10 dwellings across the parish in a 10-year period...’</p> <p>There is also a query over the rationale of ‘up to 2 dwellings per location’. It is not clear what is meant by ‘location’ and, indeed, what the evidence/justification is for up to 2 dwellings. Clarification on these points is still required as there is a conflict with NPPF para 16(d) (and therefore the basic conditions), which states that when plan making, policies should be clearly written and unambiguous, so that it is evident how a decision maker should react to development proposals.</p>
STA2: Type of residential development	<p>At the Reg. 14 stage South Norfolk Council raised some concerns regarding the terminology used in the bullet point list. Some of these have been addressed, but there a couple of points that still need to be clarified;</p> <p>The Council commented that the term ‘starter homes’ is unclear and liable for some confusion with the government-defined (but never implemented) Starter Homes, now being replaced by First Homes. The response was to change this to ‘Open market starter homes and homes for newly-forming households’, which has been actioned in the policy itself. However, paragraph 5.1.24 and footnote 22 remain unchanged.</p> <p>The policy refers to ‘Lifetime Homes’. The Council commented previously that these standards were withdrawn by government in 2015 with a new approach introducing optional building regulation requirements. Within the</p>

Section	Response
	<p>Consultation Statement, it is stated that this was due to be changed. However this has not been actioned. This may have been an oversight but this still needs amending.</p> <p>The Council also commented on the 're-use and conversion of redundant farm buildings'. Currently there is no test for what is considered redundant. There is an existing Development Management policy (2.10) and Permitted Development/Class Q for this type of development, both of which provide further restrictions. The Council's previous comments were that, as this policy is currently worded, there is the potential for a large number of barn conversions. The Council would still consider this to be the case and that the wording could lead to short term trends being followed, resulting in an over-abundance of barn conversions rather than long term needs being met.</p> <p>As per our comments on STA2, the policy is ambiguous and conflicts with NPPF para 16(d) (and therefore the basic conditions) which states that when plan making, policies should be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p>
STA3: Conservation Area and listed buildings	<p>At the Reg.14 stage we commented on whether there were any particular listed buildings which needed particular reference/protection within this policy. No specifics have been added, with the group citing all those listed in the Conservation Area Appraisal in its response to our comment. In line with NPPF Para 16(f), which states that when plan making, a policy should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area, and para 8(2)a of Schedule 4B of the Town and Country Planning Act 1990, which requires regard to be given to national policies, we are still unclear as to what this policy adds to the existing Local Plan policies in place.</p>
STA5: Strategic Gap	<p>At the Reg.14 stage the Council asked what evidence there was for the specific boundary chosen as defined in Figure 22 and what makes this particular area important. The Consultation Statement states 'The area is defined by the (1) the parish boundary, (2) the settlement edge of Harleston, (3) natural gateways, (4) the dispersed nature of the village (STA1) – further justification in the supporting text'. The Council suggests that this response could form some of the supporting text in order to help justify this policy.</p> <p>In the absence of clear evidence, in line with Paragraph: 040 Reference ID: 41-040-20130211 Revision date 11 02 2016 of the PPG on Neighbourhood Planning (https://www.gov.uk/guidance/neighbourhood-planning--2) which states that 'proportionate, robust evidence should support the choices made and the approach taken', it may prove difficult to defend this policy when determining planning applications.</p>
STA6: Important public local views and vistas	<p>At Reg. 14 the Council stated that views should be demonstrably special to the community and shouldn't simply seek to preserve open countryside. The response is that the views were identified through community consultation. However there does not appear to be specific justification included to explain why each of these views are demonstrably special.</p>

Section	Response
	<p>As per our comments for STA5, in the absence of clear evidence in line with Paragraph: 040 Reference ID: 41-040-20130211 Revision date 11 02 2016 of the PPG on Neighbourhood Planning (https://www.gov.uk/guidance/neighbourhood-planning--2) which states that 'proportionate, robust evidence should support the choices made and the approach taken', it may be difficult to apply and justify this policy in the decision making process.</p>
STA7: Local Green Spaces	<p>At Reg. 14 the Council noted that the policy references the incorrect NPPF paragraph numbers and should instead refer to Paragraphs 101, 102 & 103. It was noted that this would be changed, in the Consultation Statement. However, this remains unchanged. Therefore these references still need updating in both STA7 & Appendix C.</p>
STA8: Surface Water Drainage	<p>At Reg 14. the Council made comments regarding the requirement for further evidence relating to the areas of localised flooding, beyond that of local knowledge. We would reiterate that to ensure that full effect can be given to the policy it is important to have factual and documented evidence over frequency and severity of flooding incidents.</p> <p>It would also be useful to have some clarity over how the main policy text adds to existing South Norfolk Development Management Policies and is therefore in conformity with NPPF Para 16(f), which states that when plan making, a policy should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.</p>
STA9: Business Development	<p>At the Reg. 14 stage, the Council made comments regarding how the usage of the extended area relating to home working would be controlled once permission was granted. The response states that the expectation is this would be dealt with through planning conditions or a change of use application. This is not currently explicit in the policy and we would recommend that the policy be added to by including setting out any limitations to home working or reuse of building used for home working. This will provide a clear justification for the imposition of the conditions on home-working proposals envisaged by the neighbourhood plan group to ensure that any uses don't cause detriment to the amenity of the area.</p>



Equalities and Communities Impact Assessment

Name of Officer/s completing assessment: Vicky West

Date of Assessment: 02/12//2021

1. What is the proposed Policy (please provide sufficient detail)?

For the purposes of the assessment the term 'Policy' relates to any new or revised policies, practices or procedures under consideration.

The **Starston Neighbourhood Plan** is a community-led document for guiding the future development of the parish. It concerns the use and development of land between 2022 and 2042. It is the first Neighbourhood Plan that has been developed by and for the community of Starston. Once the Plan is made (adopted), it will become part of the statutory Development Plan for South Norfolk, and South Norfolk Council will use it (alongside documents making up the Local Plan) to determine planning applications covered by the neighbourhood area. The Parish Council will also use the Plan to respond to planning applications.

The Neighbourhood Plan has been developed under the Localism Act (2012) and the Neighbourhood Planning (General) Regulations 2012 (as amended), giving communities the right to shape future development at a local level. The Starston Neighbourhood Plan will complement existing local and national planning policy, providing a valuable level of local detail attained through consultation with residents and businesses, as well as through desk-based research.

The Neighbourhood Plan incorporates an overall vision for the parish, a series of objectives on different themes, and a range of policies that seek to achieve these objectives. The Plan was developed over a period three years before being submitted to South Norfolk Council in November 2021, and the process has involved an exhaustive programme of evidence gathering and community and stakeholder involvement. South Norfolk Council will shortly be considering the submitted documents to ensure they meet certain criteria, before progressing the Plan to a Regulation 16 consultation. Following this, the Plan will undergo an independent examination, a referendum and (if successful) its final adoption.

The Neighbourhood Plan vision is as follows:

'Starston will continue to be a small and vibrant rural parish, with a strong sense of community. As a distinct settlement from Harleston, it will have a variety of appropriate housing that meets the need and is in keeping with the character of Starston. The natural environment will be safeguarded. Opportunities for walking and cycling will be sought. Starston will be a place where people of all ages choose to live, work and visit into the future.'

The objectives that seek to achieve this are split amongst the themes of:

- Development and Design
- Environment and Landscape
- Business and Employment

The Neighbourhood Plan also incorporates a Design Guide and Code.

2. Which Protected characteristics under the Equalities Act 2010 does this Policy Impact:
(Indicate whether the impact could be positive, neutral or negative)

Protected Characteristic	Positive Impact	Neutral Impact	Negative Impact
Age	✓		
Disability	✓		
Race		✓	
Sex		✓	
Religion or Belief		✓	
Sexual Orientation		✓	
Marriage/Civil Partnership		✓	
Pregnancy/Maternity		✓	
Gender Reassignment		✓	

3. Which additional Communities characteristics does this policy impact?

Protected Characteristic	Positive Impact	Neutral Impact	Negative Impact
Health	✓		
Place inc. Rurality	✓		
Low Income and Poverty	✓		

4. What do you believe are the potential equalities impacts of this policy?

Please include:

- Partnership organisations worked with in the development of this policy
- Evidence gathered to inform your decision
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be positive, neutral, or negative and impact groups differently

Like most Local Plan documents that are concerned with the development and use of land, the Protected Characteristics that are most impacted are Age and Disability. The former due to the pressures facing young people being able to afford housing in the community, and access employment locally, for example. Elderly people face issues such as being able to down-size to smaller, more suitable homes. The Neighbourhood Plan takes measures to address these issues, primarily through a series of housing policies STA1 (location and scale of residential development) STA2 (types of residential development) and STA4 (design of development), which seek to support a range of housing which would provide for the needs of these different groups within the community.

The Neighbourhood Plan includes statements of evidence and justification alongside each of the proposed policies, explaining how public consultation with residents, as well as factual research, has informed the policy being proposed. One of the supporting documents published alongside the Neighbourhood Plan is a Consultation Statement which provides more detail of how and when public consultation and engagement was carried out, what the results of this were, and how these results have impacted subsequent development of the policies.

A Neighbourhood Plan Steering Group was formed by the Parish Council to lead on the project with the help of external consultants. Throughout the process the steering group ensured that the local community and stakeholders were kept informed of the process and were able to get involved in the development of the Neighbourhood Plan. Stakeholder bodies that were consulted included Norfolk County Council, neighbouring parish and town councils, the Environment Agency, Natural England, Historic England, and South Norfolk Council, amongst others.

Communications methods used during the process included a local Neighbourhood Plan website; the parish magazine; Facebook; posters; flyers; A-boards; local radio etc. During the plan process, several public and stakeholder engagement methods were utilised, including online mapping, Zoom meetings, a business survey, a household survey and a face-to-face exhibition. This culminated in a statutory, pre-submission Neighbourhood Plan consultation that took place with the community and stakeholder bodies prior to the Plan being submitted to the Council.

The engagement and consultation process allowed the emerging policies to be discussed, tested and updated with local residents and stakeholders, before the draft Plan was finalised for submission.

Support has been provided by South Norfolk Council, in the form of officer guidance, but also through a grant award. Financial support was also provided by the national support body, Locality.

5. What do you believe are the potential communities impacts of this policy?

Please include:

- How the policy can meet agreed priorities
- Evidence gathered to inform your decision
- Partnership organisations worked with in the development of this policy
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be positive, neutral, or negative and impact groups differently

As explained above, the overall intention of the Neighbourhood Plan (as demonstrated by the Vision) is to encourage sustainable development and seek to benefit the entire community. The Neighbourhood Plan is required to demonstrate its contribution to sustainable development (encompassing economic, environmental and social sustainability). This is addressed in detail within the Basic Conditions Statement, which is one of the additional, supporting documents that the Parish Council is required to submit alongside its Neighbourhood Plan.

The following summary of how the Neighbourhood Plan contributes to sustainability is an excerpt from the Basic Conditions Statement:

‘The plan has been formulated with Sustainable Development at its heart. The embedded theme of sustainability is reflected in the overarching vision for the plan, which reflects the three distinct strands of sustainability – economic, environmental, and social.’

The Basic Conditions Statement also assesses the Plan against the National Planning Policy Framework Sustainable Development Objectives. The following illustrates those Neighbourhood Plan objectives and policies that help to address the social sustainability objective within the NPPF.

NPPF 2021:

A social objective: to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;

Contribution through Starston Neighbourhood Plan Objectives and Policies:

Objective 1: To support a small amount of appropriate new housing for development for a mixed community.

Objective 2: To encourage well-designed and well-located development that complements the distinctive character of Starston.

Objective 3: To protect and enable access to the countryside.

Objective 4: To encourage and support new and exciting businesses

STA1: Location and scale of residential development – exception policy

This policy allows for a limited amount of new small-scale residential development outside the existing settlement boundaries.

STA2: Type of residential development

This policy encourages a range of housing types to meet the needs of a mixed community.

STA8: Surface water drainage

This policy seeks to ensure that new development does not take place in locations that are at risk of flooding.

STA9: Business development

This policy encourages new developments which encourage business and employment opportunities.

6. How is it proposed that any identified negative impacts are mitigated?

Please include:

- **Steps taken to mitigate, for example, other services that may be available**
- **If a neutral impact has been identified can a positive impact be achieved?**
- **If you are unable to resolve the issues highlighted during this assessment, please explain why**
- **How impacts will be monitored and addressed?**
- **Could the decision/policy be implemented in a different way?**
- **What is the impact if the decision/policy is not implemented?**

This assessment does not identify any particular negative impacts or equalities-related issues concerning the Starston Neighbourhood Plan. This is due, in large part, to the fact that the statutory planning process requires an assessment of the proposed plan's contribution to sustainable development as a matter of course. Neighbourhood Plans are required by law to have undergone appropriate community and stakeholder consultation, and to demonstrate that policies are evidenced, justified, deliverable, and sustainable.

If successful, and once made by South Norfolk Council, the Neighbourhood Plan will primarily be monitored by Starston Parish Council, but the District Council will also be able to assess its implementation from a development management point of view and the determination of planning applications within the parish.

Signed by evaluator: Vicky West

Signed by responsible head of department: Helen Mellors

Please send your completed forms to the equalities lead (Victoria Parsons) to be reviewed and stored in accordance with our legal duty.

REVIEW DATE - _____

(See Page 2 for details of reviews. Please send a copy of the reviewed document to Victoria Parsons)

REDENHALL WITH HARLESTON NEIGHBOURHOOD PLAN SUBMISSION

Report Author(s): Richard Squires
Senior Community Planning Officer
01603 430637
richard.squires@broadland.gov.uk

Portfolio: External Affairs and Policy; Stronger Economy

Ward(s) Affected: Harleston

Purpose of the Report:

Harleston Town Council has submitted its proposed Neighbourhood Plan, along with necessary supporting information to South Norfolk Council. The purpose of this report is to agree to take the proposed Plan through to the next stages of consultation and independent examination.

Recommendations:

It is proposed that Cabinet agree:

1. That the submitted Redenhall with Harleston Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
3. That the proposed South Norfolk Council response, as detailed in Appendix 2, is formally submitted as part of the Regulation 16 consultation.

1 SUMMARY

- 1.1 Harleston Town Council submitted its proposed Neighbourhood Plan, along with necessary supporting information to South Norfolk Council in late November 2021. The purpose of this report is to agree to take the proposed Plan through to the next stages of consultation and independent examination.

2 BACKGROUND

- 2.1 Harleston Town Council, as the appropriate Qualifying Body, applied to South Norfolk Council in September 2020 to designate a Neighbourhood Area for the purpose of producing a Neighbourhood Plan.
- 2.2 Since that time, the local planning authority has supported the appointed Neighbourhood Plan steering group in terms of funding, professional advice and guidance from officers, and other forms of practical support. The process of producing the Plan has seen the steering group undertaking consultation with residents and other stakeholder organisations, with a view to developing and drafting Neighbourhood Plan objectives and policies with the help of an independent consultant.

3 CURRENT POSITION/FINDINGS

- 3.1 On submission of a Neighbourhood Plan to the local planning authority, the authority must undertake an assessment of the proposed plan against certain criteria. This is required by Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
- 3.2 The following sets out details of the assessment against each of the prescribed criteria (bold headings);
- 3.3 **Is the parish/town council authorised to act?**
Harleston Town Council applied to South Norfolk Council to designate its Neighbourhood Area in line with the civil parish boundary. This application was approved in September 2020. It is therefore considered that the Town Council is authorised to act in relation to this neighbourhood area.
- 3.4 **Do the proposals and accompanying documents:**
(a) Comply with the rules for submission to the Council?
Regulation 15 of the Neighbourhood Planning Regulations 2012 (as amended) states that the submitted documents should include:
- A map or statement identifying the area to which the plan relates.
 - A Consultation Statement, which contains details of those consulted, how they were consulted, summarises the main issues and concerns raised and how

these have been considered and, where relevant, addressed in the Neighbourhood Plan.

- The proposed Neighbourhood Plan.
- A Basic Conditions Statement, showing how the Plan meets the basic conditions set out in Schedule 4B of the 1990 Act.
- An SEA screening assessment and, if required as a result of the latter, an SEA.

The Town Council has supplied all of the above documentation.

3.5 Do the proposals and accompanying documents:

(b) Meet the definition of a Neighbourhood Plan?

It is considered that the Redenhall with Harleston Neighbourhood Plan meets the definition of a Neighbourhood Plan as set out in Section 38A of the Planning and Compulsory Purchase Act 2004, containing (as it does) a series of planning policies that seek to manage development within the parish.

3.6 Do the proposals and accompanying documents:

(c) Meet the scope of Neighbourhood Plan provisions?

The Redenhall with Harleston Neighbourhood Plan clearly states that it is a development plan for Harleston, which runs until 2038. The Neighbourhood Plan does not make any provision regarding excluded development. Excluded development is that which is either a 'county matter' (relating to minerals), any operation relating to waste development, or development consisting wholly or partly of a national infrastructure project.

3.7 The Neighbourhood Plan only relates to the Harleston Neighbourhood Area and it does not repeat an existing planning permission. It is therefore considered that it satisfactorily meets the provisions defined in Section 38B of the Planning and Compulsory Purchase Act 2004.

3.8 Has the parish/town council undertaken the correct procedures in relation to consultation and publicity regarding the Neighbourhood Plan?

Regulation 14 of the Neighbourhood Planning Regulations 2012 states that, before submitting the Neighbourhood Plan to the local planning authority, the Qualifying Body should publicise the Plan and consult the public and stakeholder bodies over a period of six weeks.

3.9 The pre-submission (Reg. 14) consultation undertaken by the Town Council in relation to the draft Neighbourhood Plan is summarised in the Consultation Statement. This provides details of the publicity that was undertaken at this (and prior) consultation stages and the bodies that were consulted on the draft Plan. A copy of the draft Neighbourhood Plan was received by the District Council, for comments, at this stage (which were duly made).

4 PROPOSED ACTION

- 4.1 It is proposed that, as Harleston Town Council has met each of the criteria specified above, South Norfolk Council approves the submission of Neighbourhood Plan and that confirmation of this is sent to the Town Council.
- 4.2 Once approved, District Council officers will arrange for the Neighbourhood Plan to be published and will invite comments from the public, stakeholder bodies and previous consultees over a minimum period of six weeks. This requirement is set out in Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 4.3 Officers have considered the content of the submitted Neighbourhood Plan to identify whether there are any significant, outstanding issues on which South Norfolk Council may wish to make its own representations during the Reg. 16 consultation.
- 4.4 Several key issues have been identified, which were raised previously by the Council during the pre-submission Regulation 14 consultation. These relate to Policy RWH7 (Protection of existing community facilities), Policy RWH9 (Local Green Spaces), Policy RWH10 (Town centre vitality and viability), and Policy RWH12 (Small scale, day to day retail in new developments). Details of the proposed representations can be found in Appendix 2. The rationale for making these representations largely relates to concerns around their conformity with the NPPF (and thus whether the policies can be said to meet the basic conditions for neighbourhood planning) .
- 4.5 The Reg. 16 publication period will be followed by an independent examination which will be carried out by a (yet to be appointed) accredited Neighbourhood Plan examiner, in accordance with Regulation 17.
- 4.6 Following the examination (which is normally dealt with via written representations), the examiner will produce a report recommending whether or not the Neighbourhood Plan should proceed to a referendum (with or without certain modifications). South Norfolk Council will then consider this report and decide whether or not to approve the examiner's recommendations.
- 4.7 If it is decided that the Plan should proceed to a referendum, then everyone eligible to vote within the Neighbourhood Area is invited to vote on whether they wish to see the Neighbourhood Plan made. This is a simple 'yes/no' vote and a majority of those voting in favour of the Plan (50%+1) is required before it can be made by South Norfolk Council.

5 OTHER OPTIONS

- 5.1 The submitted Neighbourhood Plan can be refused if it is felt that the criteria discussed above have not been met, or if the Plan is a repeat proposal, as defined in legislation. A written statement would need to be sent to the Town Council,

detailing the reasons why the proposal has not been approved. However, it is considered that the above criteria have been met and there appear to be no valid reasons for refusal.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** – There are no significant resource implications in approving the submitted Plan. There will be a small amount of officer time required to issue notice of the decision to Harleston Town Council.
- 6.2 The subsequent stages will demand greater officer time (preparing the plan and related documents for consultation, preparing and arranging the examination). This will be resourced from within the Place Shaping Team.
- 6.3 There are limited costs involved in undertaking the consultation, as the majority of this will be via electronic means. A copy of the Neighbourhood Plan will be made available in the local library and at the Council offices, for inspection.
- 6.4 Following the consultation period, there will be costs to the Council associated with the examination and referendum. The average cost of an examination is currently approximately £4,800 and the average cost of a referendum is approximately £4,500. It is worth noting that South Norfolk Council can claim £20,000 from DLUHC (Dept. of Levelling-Up Housing & Communities) once the authority approves a Neighbourhood Plan to proceed to a referendum, meaning these costs can be recouped.
- 6.5 **Legal Implications** – The steps outlined in this report comply with appropriate legislation within Schedule 4B of the Town & Country Planning Act 1990 and the Neighbourhood Planning (General) Regulations 2012 (as amended).
- 6.6 They also have regard to the Environmental Assessment of Plans and Programmes Regulations 2004 and The Conservation of Habitats and Species Regulations 2010. If successful at referendum, the Neighbourhood Plan will become part of the statutory Development Plan and will therefore be one of the main considerations in the determination of applications for planning permission within the parish.
- 6.7 **Equality Implications** – There are no significant equalities implications associated with the approval of the submitted Harleston Neighbourhood Plan. A full Equality Assessment has been carried out in relation to the submitted plan (see Appendix 3).
- 6.8 **Environmental Impact** – The Neighbourhood Plan has been subject to a Strategic Environmental Assessment (SEA) screening and a Habitat Regulations Assessment (HRA) screening, as required by legislation. These initial assessments consider whether the proposed policies in the Plan will have any significant impact on identified environmental objectives or on nearby EU designated sites. No significant impacts have been identified.

- 6.9 **Crime and Disorder** – There are no significant risks associated with the matters covered in this report.
- 6.10 **Risks** – There are no significant risks associated with the matters covered in this report.
- 6.11 There are risks associated with the subsequent stages in the process of adopting a Neighbourhood Plan; specifically that the Plan fails the examination, and also that the Plan fails to gain support during the local referendum. It is felt that these risks are relatively low, at present, and measures will be taken where possible, by either the District Council or Harleston Town Council, to mitigate against their occurrence.

7 CONCLUSION

- 7.1 As discussed above, on submission of a Neighbourhood Plan to the local planning authority, the authority must undertake an assessment of the proposed plan against certain criteria. This is required by Schedule 4B of the Town and Country Planning Act 1990.
- 7.2 As Harleston Town Council has met each of the assessment criteria set out above, the next step is to accept their submission and to start preparations for the Reg.16 consultation.
- 7.3 Officers are proposing a small number of representations to be submitted on behalf of South Norfolk Council, as part of this consultation.

8 RECOMMENDATIONS

- 8.1 It is proposed that Cabinet agree:
1. That the submitted Harleston Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
 2. That the Neighbourhood Plan can therefore proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
 3. That the proposed South Norfolk Council response, as detailed in Appendix 2, is formally submitted as part of the Regulation 16 consultation.

Appendix 1: Harleston Neighbourhood Plan – submission version

Appendix 2: Proposed South Norfolk Council consultation response (Reg. 16)

Appendix 3: Harleston Neighbourhood Plan - EQIA

Background Papers

[Harleston Neighbourhood Plan submission documents](#)

Redenhall with Harleston Neighbourhood Plan 2022-2038



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If you would like this document in large print
or in another format please contact
Redenhall with Harleston Town Council,
clerk@harleston-tc.gov.uk

1. Introduction

- 1.1 The Redenhall with Harleston Neighbourhood Development Plan will provide the first ever statutory planning policy document specifically for the parish of Redenhall with Harleston. Neighbourhood Plans such as this were made possible by powers contained within the 2011 Localism Act which sought to decentralise policy making to the local level and give more powers to communities and the right to shape future development where they live.
- 1.2 The Neighbourhood Plan is a community-led document for guiding the future development of the parish. It is about the use and development of land between 2022 and 2038. Once the Plan is made and adopted, South Norfolk Council will use it to determine planning applications. Redenhall with Harleston Town Council will use the Plan to respond to planning applications.
- 1.3 The Redenhall with Harleston Neighbourhood Plan complements existing national and local planning policy by providing a specifically local level of detail attained through consultation with the local community and further research. Commissioned by Redenhall with Harleston Town Council, the Neighbourhood Plan has been developed by a Steering Group of local residents and Town Councillors (see **Appendix A** for Steering Group members).
- 1.4 By undertaking a Neighbourhood Plan, the Steering Group aims to:
 - Establish what is special about the parish of Redenhall with Harleston.
 - Enable residents to influence and shape new development in the parish, in terms of design, character, heritage, amenities, and the environment.
 - Identify community needs for the use of developer contributions and other possible funds.
- 1.5 The Neighbourhood Plan has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012 (as amended). The flow chart below (figure 1) outlines the stage the Steering Group have gone through and the future work.



Figure 1: Neighbourhood Plan process and progress.

- 1.6 The Redenhall with Harleston Neighbourhood Plan is not a mechanism for stopping development, it is there to ensure that development takes place in an appropriate way for the parish. It has been positively prepared, with the purpose of supporting and managing growth, not prevent it. In practice, higher level planning documents such as the emerging Local Plan for the Greater Norwich Area (which includes South Norfolk district) cannot feasibly deal with all of the issues particular to every town and village across three districts, whereas the Neighbourhood Plan can by providing additional details which reflect specific local circumstances and conditions.

- 1.7 The Neighbourhood Plan provides clarity on what will be expected from development proposals, gives prospective investors confidence in how the area will change in the future, and ensures that the impact of development is anticipated and planned for in Redenhall with Harleston. A Neighbourhood Plan is a significant document and will carry legal weight so that developers have to take note when considering future developments in the parish.
- 1.8 The Neighbourhood Plan Area covers the entire Parish of Redenhall with Harleston and was formally designated by South Norfolk Council in September 2020.
- 1.9 This is the submission version of the Redenhall with Harleston Neighbourhood Plan. The previous version was prepared for 'pre-submission consultation' which took place between 24th July 2021 and 10th September 2021. Local residents, businesses, and statutory agencies had the opportunity to comment on the draft Plan and 89 responses were received of which 18 were from statutory consultees and the remainder were from local residents. All comments were collated and considered. The Plan was amended for submission to South Norfolk Council in November 2021.

Accompanying supporting documents

- 1.10 When the Redenhall with Harleston Neighbourhood Plan is submitted for independent examination, it will also be accompanied by the following documents:
- **Basic Conditions Statement** – outlines how the statutory basic conditions have been met.
 - **Consultation Statement** – outlines how and when the public have been consulted on the content of the Plan.
 - **Strategic Environmental Assessment Screening Report** – to determine whether the Neighbourhood Plan requires a full Strategic Environmental Assessment.
 - **Habitat Regulation Screening Report** – identifies any potential impacts on protected species or habitats.
 - **Redenhall with Harleston Housing Needs Assessment** - undertaken by consultants AECOM in February 2021.
 - **Redenhall with Harleston Design Guidance and Code** - undertaken by consultants AECOM in June 2021.

Examination and referendum

- 1.11 After submission, South Norfolk Council will undertake a checking process and further consultation. The Neighbourhood Plan will then go through an independent examination. Subject to the Examiner's report, the Neighbourhood Plan should then proceed to referendum.
- 1.12 At referendum, every resident of Redenhall with Harleston, who is entitled to vote in the Council elections will have the opportunity to vote on whether or not they agree with the Neighbourhood Plan. At referendum, residents will be asked, ***'Do you want South Norfolk Council to use the Neighbourhood Plan for Redenhall with Harleston parish to help it decide planning applications in the Neighbourhood area?'***. If the Plan gets at least 50 per cent support from those who vote in the referendum, South Norfolk will 'make' (adopt) the Neighbourhood Plan as part of the statutory development plan.

National and local planning policy context

- 1.13 Every local planning authority in England is required to prepare a Local Plan. Local Plans include all of the local planning policies for the district's area and identifies how land is used, determining what will be built and where. South Norfolk is part of the trio of Greater Norwich Authorities who worked together initially to produce a Joint Core Strategy (JCS) adopted in 2011 and are now producing the Greater Norwich Local Plan (GNLP) which reached Pre-submission stage (Regulation 19) in February 2021. The Greater Norwich Local Plan, along with any Neighbourhood Plan, provides the basis for determining planning applications and future development in the local area and should be consistent with the National Planning Policy Framework.
- 1.14 The 'National Planning Policy Framework' (NPPF) was published in March 2012 and revised in July 2018, February 2019 and July 2021. It sets out the Government's planning policies for England and how these should be applied. The Redenhall with Harleston Neighbourhood Plan is in conformity with the revised NPPF, in particular, taking a positive approach that reflects the presumption in favour of sustainable development.
- 1.15 Development is defined as 'the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land'.¹ Section 38 of the Planning

¹ Section 55 of the Town and Country Planning Act 1990.

and Compulsory Purchase Act 2004 emphasises that the planning system continues to be a 'plan-led' system and restates the requirement that 'determination must be made in accordance with the Plan unless material considerations indicate otherwise'.

- 1.16 The Redenhall with Harleston Neighbourhood Plan once 'made' (adopted) will form part of the statutory Development Plan for the area and future planning applications for new development will be determined using its policies.
- 1.17 Currently, the statutory development plan for the area consists of the Joint Core Strategy (2011), the South Norfolk Development Management Policies (2015) and the Site-Specific Allocations and Policies Document (2015). As referred to above, South Norfolk Council is in the process of replacing those documents with a new Local Plan (GNLP).

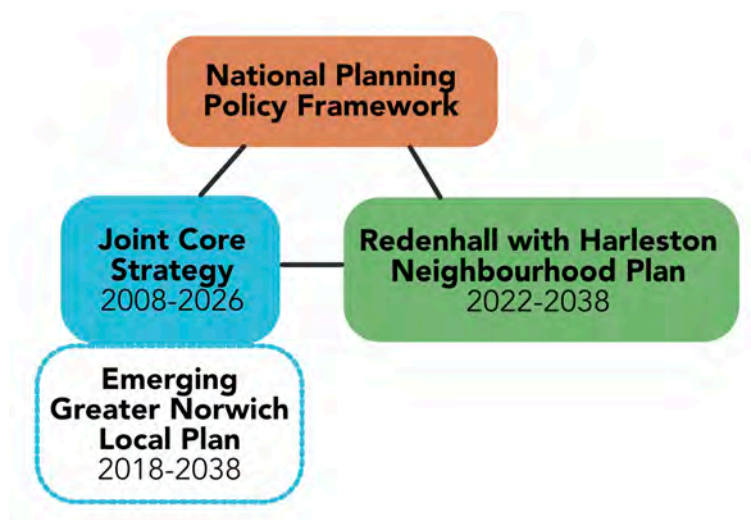


Figure 2: Spatial and strategic policy context: relationship between the NPPF, JCS, emerging GNLP, and the Redenhall with Harleston Neighbourhood Plan. Own diagram.

Policy framework for Redenhall with Harleston Neighbourhood Plan

- 1.18 Harleston is identified as a 'Main Town' in the settlement hierarchy of the adopted JCS which looks to the period 2026. The emerging GNLP retains this classification in the settlement hierarchy but looks ahead further to 2038. The JCS allocated between 200-300 houses in Harleston. The South Norfolk Site allocations document translated this into specific sites as follows:
- HAR1 – Land off Mendham Lane: 120 dwellings.
 - HAR3 – Land at former Howard Rotovator Works: 29 dwellings.
 - HAR4 – Land north of Spirketts Lane: 95 dwellings.
- 1.19 The Plan also made two employment allocations as follows:
- HAR6 – Land north of Spirketts Lane.
 - HAR7 – Land south of Spirketts Lane.

- 1.20 At the time of writing, the emerging GNLP proposes to carry forward the existing allocations HAR4, 6 and 7 together with a mixed use/retail allocation HAR5 at Station Hill. In addition, the emerging GNLP proposes a further mixed use/housing allocation at Briar Farm (GNLP2136) for approximately 360 dwellings plus 90 units of extra care housing, (which is calculated to give a figure of 405 dwellings in total²) together with 0.8ha of retail or employment land, 1.6ha for community use, allotments, and public open space, and at land south of Spirketts Lane (GNLP2108) for 150 dwellings.

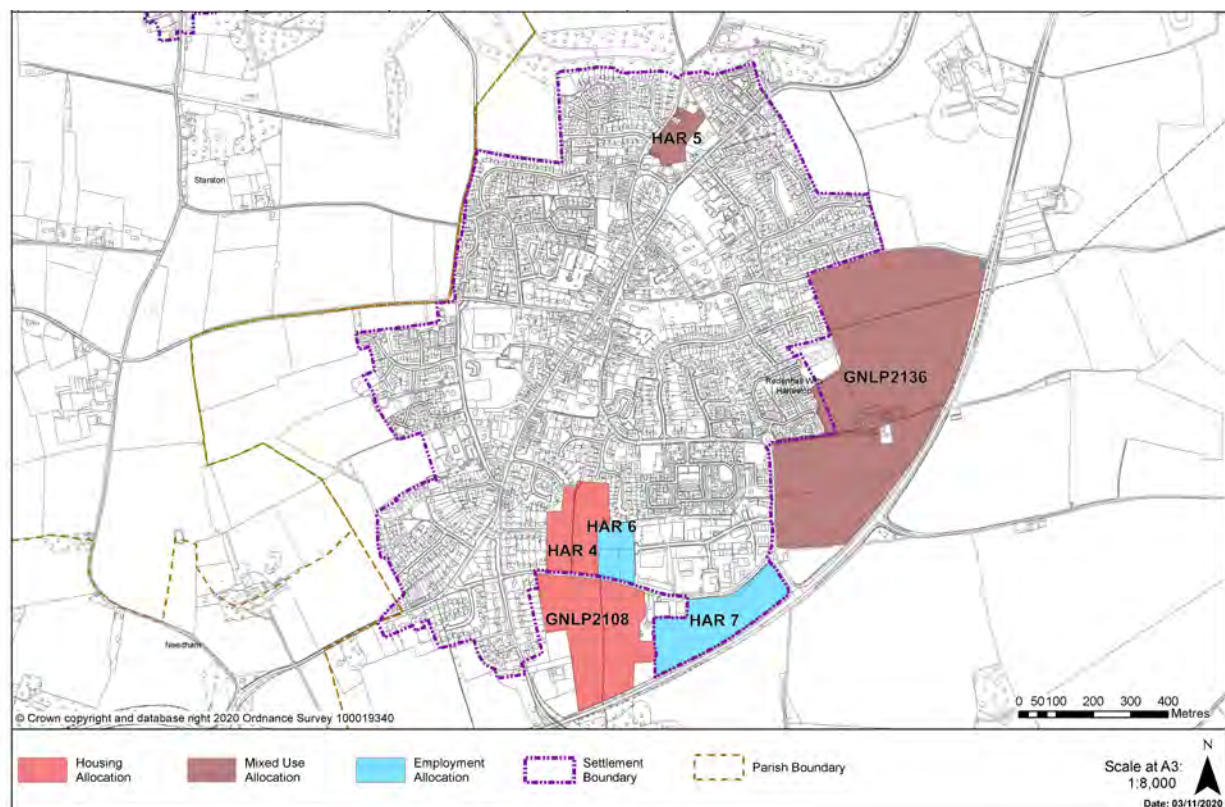


Figure 3: Emerging Greater Norwich Local Plan settlement map for Redenhall with Harleston, Regulation 19. Source: GNLP website³.

- 1.21 Due to the level of new housing growth proposed in the current and emerging Local Plan, the Redenhall with Harleston Neighbourhood Plan is not allocating further sites for development. Instead, its proposed policies will focus on managing the impacts of the proposed growth and ensuring that the community benefits are realised.

² For calculating strategic housing requirement, a 90 unit/extra care housing scheme is estimated as equivalent to 45 dwellings. An estimate based on the number of homes made vacant by a person/household moving from general accommodation into specialist accommodation.

³ <https://www.gnlp.org.uk/regulation-19-publication-part-2-sites-4-main-towns/redenhall-harleston>. Accessed 24.06.21.



2. Redenhall with Harleston parish

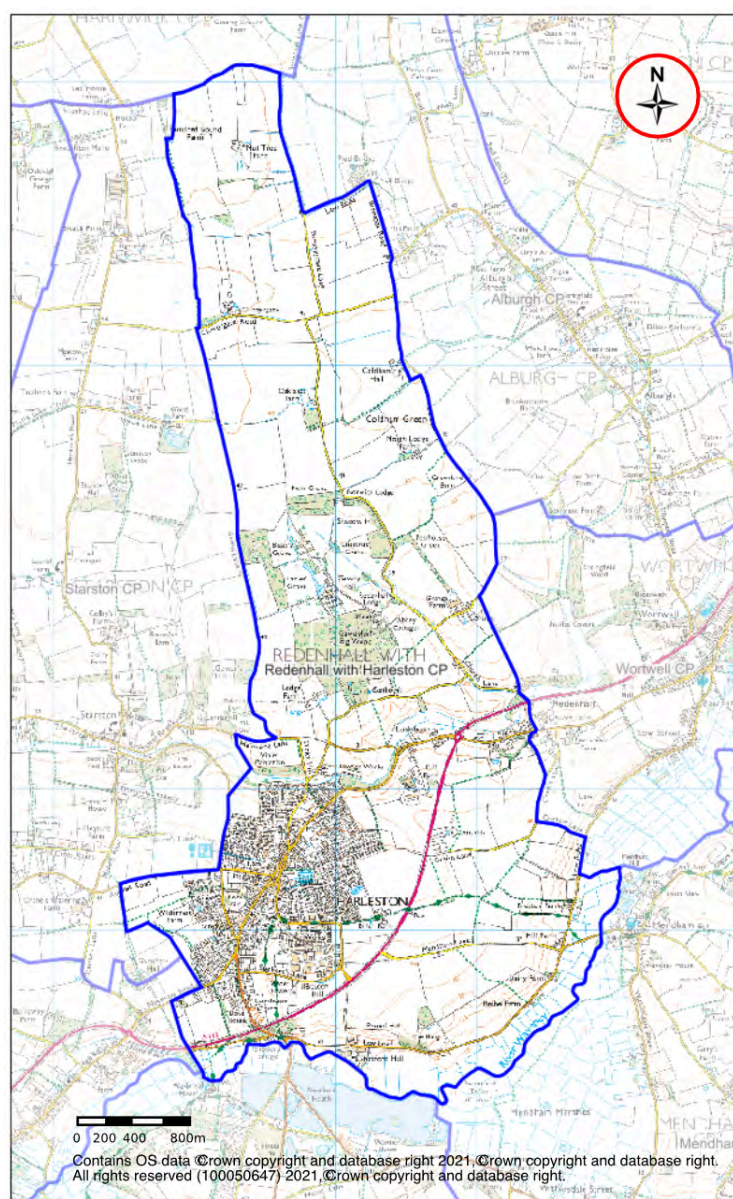


Figure 4: Redenhall with Harleston parish, the Neighbourhood Plan area (source: Parish Online, with own annotations). Blue line denotes parish boundary.

Brief History

- 2.1 The parish of Redenhall with Harleston is located in the Waveney Valley in South Norfolk, adjacent to the Suffolk border.
- 2.2 The Parish of Redenhall with Harleston contains the two settlements of Redenhall and Harleston. Redenhall village itself is the earlier, listed in the Domesday Book, whereas Harleston existed by the time of the Domesday Book, but is largely a medieval creation set up during the 13th century. The name Redenhall may derive from the Old English words for 'reedy nook',

unsurprising considering the number of drains that cross the parish, the southern border of which is formed by the River Waveney.

- 2.3 The name 'Harleston' has a complex history. It is possible that the name derives from the Old English name Heoruwulf, however, a local legend states the name is actually derived from Harolds Stone (Norfolk Historic Environment Record (NHER) 11081), a roughly rectangular rock of about 2m x1m x 1m which is situated in a pedestrian walkway between The Thoroughfare and Church Street in Harleston. It is said that this stone, also referred to as 'King Harold's mounting block', is the stone on which Harold stood to apportion land.
- 2.4 The parish itself is situated just west of Wortwell parish, and east of Starston and the Pulham parishes, and shares their roughly rectangular shapes. This group of parishes sits on the southern border of Norfolk and has undergone some boundary changes during the last few centuries. Previous to 1885, part of the present parish of Redenhall with Harleston was in Mendham parish, which also contained land in Suffolk. In 1885, the western side of Mendham stretching from the River Waveney northwards as far as Mendham Lane and eastwards as far as Cuckoo Lane became part of Redenhall with Harleston and the easterly side became part of the new parish of Wortwell⁴.
- 2.5 The NHER indicates that the earliest signs of human occupation are Neolithic and Palaeolithic. There are few Bronze Age records and also very little evidence of Saxon occupation. However there have been a number of Roman finds within the parish including coins and jewellery.
- 2.6 This parish has a large number of historic buildings, with over 130 listings in this parish according to Historic England.
- 2.7 Harleston is among the few ancient towns to escape a major fire in Tudor/Stuart times. This has endowed it with an exceptional proportion of its buildings dating from the 1300's to the 1600's, often re-fronted in Georgian times. In the centre Medieval Hall Houses remain as a physiotherapist, as Reydon House and as a modest terrace. The solicitors (Ancient House) carries carvings outside from the 1400's, whilst the Indian restaurant (Taste of Raj) features script, in code, from the same century and was probably a guild hall. The Swan, The Cardinal's Hat and JD Youngs (Magpie) all date from the 1500's and became coaching inns, whilst the imposing Bank and Merchants House dates from the same century. Scores of houses date from the 1600's, including most of the buildings on The Thoroughfare, Broad Street and Church Street,

⁴ <https://www.genuki.org.uk/big/eng/NFK/Mendham>

such as Gingerbread Cottage, as does the impressive Old House in the Old Market Place, being from 1626. Perhaps pride of place should be conferred upon Caltofts, with its Tudor fireplace and Arts and Crafts restoration, and Candler's, dating from the 1680's, a splendid example from William and Mary's reign. The 1700's are well represented by the old Gurney's Bank and The Beeches, whilst the 1800's have the splendid classical portico of the Corn Exchange and the handsome railway Station house in Italianate style, to mention but a few.

- 2.8 According to Norfolk Heritage Explorer, 'sites of particular interest include Caltofts in Harleston (NHER 12476), dated to 1460 but built on the foundations of an earlier house of 1375. There are also the remains of a number of medieval hall houses inside later buildings. One example of this is Nos 16 and 18 Old Market Place, Harleston, which contains a 14th or 15th century raised aisled hall (NHER 14405), and a similar late medieval hall forms part of Nos 4, 6 and 8 London Road (NHER 30306)'⁵.
- 2.9 There has been a church in Harleston for several centuries. Until 1873 an ecclesiastical building known as St. John's Chapel (now demolished) stood on the side of the present market place. The cupola of the original chapel can be seen at the top of the clock tower. In 1872 the present church of St. John the Baptist was built. Although it lacks a tower, the church is constructed from regular Victorian knapped flint with stone trim. The parish also contains a number of monuments, including two aircraft crash sites, one dating to World War I and one to World War II. In addition, there are two of the common type 22 World War II pillboxes, one situated about 100m east of Redenhall Road) and one near to 13 London Road although this one has been partially demolished. The parish also contains the site of a former Royal Observer Corps post, in fields southeast of Harleston which was in use during the Cold War.

Historic Environment

- 2.10 Historic England contains records for Redenhall with Harleston parish. The Church of St. Mary in Redenhall is a Grade I listed building, Candler's House, the Swan Hotel, 16 and 18 Old Market Place and Reydon House are Grade II* listed buildings. The remaining listed buildings are Grade II.
- 2.11 Most of the Harleston Town Centre is covered by the Harleston Conservation Area. Harleston Conservation Area was originally designated in June 1975 and the boundary has since been extended to include areas of late 19th century

⁵ <https://www.heritage.norfolk.gov.uk/record-details?uid=%27TNF1250%27>. Accessed 25.06.21.

and early 20th century development to the north and south. The boundary of the Conservation Area can be seen in the map below which is taken from the Harleston Conservation Area Character Appraisal and Management Guidelines document produced by in 2016 by South Norfolk Council (figure 5).

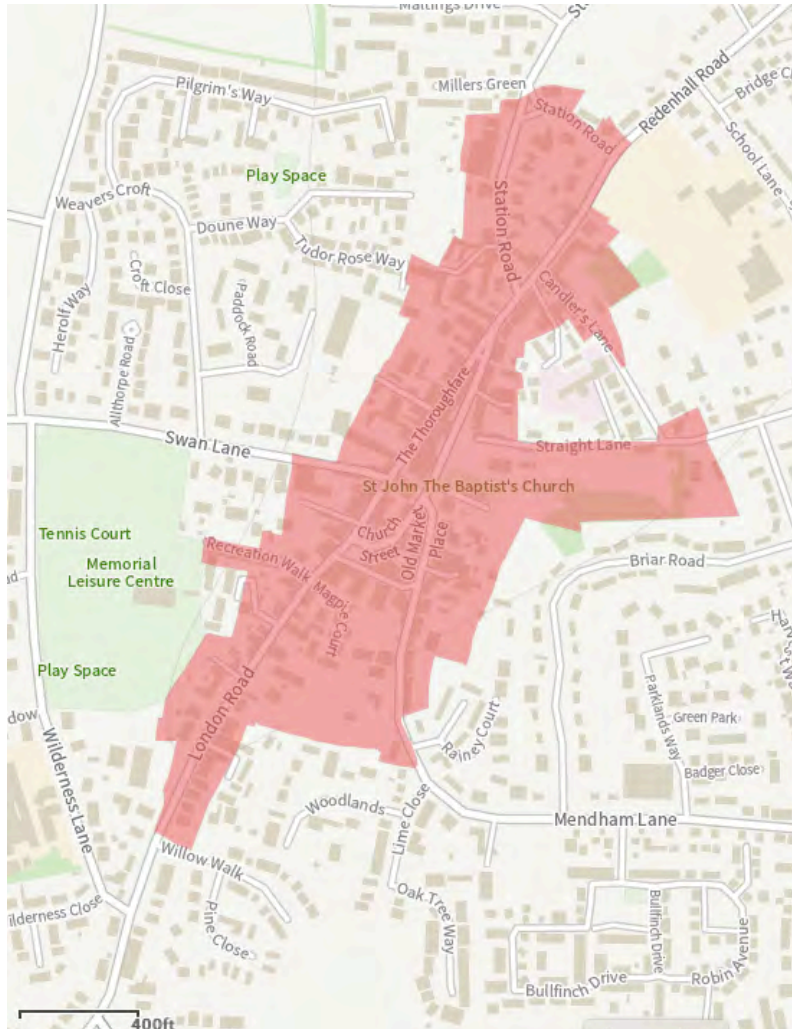


Figure 5: Map showing Harleston Conservation Area. Source: South Norfolk Council.⁶

Population

2.12 The usual resident population of Redenhall with Harleston parish was 4,541 residents in the 2011 census. The population was 48.2 per cent male and 51.8 per cent female.

2.13 In 2019, the population estimate for Harleston ward was 5,226 in 2019.

⁶https://www.arcgis.com/apps/webappviewer/index.html?id=e45e8da6e94343149d89024894a83134&query=Conservation_Areas_for_Broadland_and_South_Norfolk__View__8907%2CCon_Area_N%2CHarleston%20Conservation%20Area. Accessed 08.07.21.

- 2.14 The age structure of Redenhall with Harleston parish from 2011 Census data indicates that the mean age of residents in Redenhall with Harleston was 45.3 years in the 2011 Census compared with 41.7 years for Norfolk and 43 years for South Norfolk district. The median age was 46 years for Redenhall with Harleston, 43 years for Norfolk and 45 years for South Norfolk.

Health and wellbeing

- 2.15 Data from the Census indicates that residents reported their health in 2011 compared to South Norfolk and Norfolk. Harleston residents generally reported themselves as slightly less healthy than the South Norfolk and Norfolk averages.
- 2.16 The Patient Participation Group completed a survey of patients and received 849 responses. The results showed that 86 per cent of respondents would prefer community health services to be available in Harleston. 95 per cent of respondents agreed that the vacant Paddock Road Surgery building should be used as a health hub from which a multidisciplinary team spanning community health, social care, local government services and the voluntary sector can operate.

Education

- 2.17 The parish contains a full range of education establishments for children up to the age of 16. Harleston Pre-school Nursery is located next to Harleston Primary School and is available to all children between 2-5 years old during term time.
- 2.18 Harleston CE Primary School is for pupils aged 3 to 11 years old. There were 456 pupils on roll in January 2020. Archbishop Sancroft High School on Wilderness Lane in Harleston serves pupils aged 11 to 16 years. There were 455 pupils on roll in January 2020. High School pupils in Harleston also attend Stradbroke High School, Hartismere High School, Bungay High School, Diss Sixth Form Centre and institutions in Norwich. There is no sixth form college in Harleston.
- 2.19 Historically the numbers of children living in the catchment of Harleston Primary has been larger than the 60 places. Where applications have exceeded places available for a year group, pupils have been offered either other schools elsewhere in the county or in Suffolk. The school's buildings are at capacity and temporary buildings are in use. Archbishop Sancroft High School provides 100 places for each year group and on the whole the current

catchment numbers match that figure quite well. However, the numbers of pupils in the earliest year groups are increasing. Pupils who cannot gain admission have been offered places at other High Schools in South Norfolk or Suffolk.

Community facilities

- 2.20 Harleston Medical Practice is based at Bullock Fair Surgery and has a dispensary at the surgery. There is a pharmacy and two opticians in the town. NHS and private dental services are available at Bupa Dental Care Harleston.
- 2.21 Harleston has many and varied amenities including a library, a bank, a Post Office, many independent shops, cafes, and restaurants, two hotels, a pub, two vets, a Wednesday market and free parking. The High School has a swimming pool with use by a private swimming company for lessons. Harleston recreation ground includes a football pitch, a family inclusive sports area with a BMX track, a green gym, basketball hoop, an outdoor bowls club and play areas for all ages. There is a gym, tennis courts and squash courts at Harleston Community Leisure Centre, run by Harleston Town Council. There is another bowls club to the south of the town offering indoor and outdoor bowling. There is a small museum located next to King George's Hall.
- 2.22 South Norfolk Council owns and maintains four playgrounds and recreational spaces in Harleston. These are in Nelson Close, Doune Way, Harold Way and Chaffinch Mews.
- 2.23 There is a very active community in Redenhall with Harleston parish and many clubs and groups serving all age groups. Harleston Information Plus is a community hub for residents and provides information for residents, a jobs club, jobs training and a befriending service, as well as guiding visitors to local attractions and services. Information on clubs and groups in Redenhall and Harleston can be found at www.harleston-norfolk.org.uk. The Kindness Help Hub was formed at the start of the pandemic and works to assist those more vulnerable residents with their shopping and prescriptions.
- 2.24 Community buildings used by clubs and groups in the parish include King George's Hall on Broad Street, the Masonic Hall, St. John's Church, Jay's Green Hall, the Harleston Methodist Church and meeting rooms at Harleston Information Plus, where there is capacity for extra bookings.
- 2.25 Harleston and District Business Forum was formed in 2012 to provide business owners and other interested parties with a forum to share business information,

to network, to be an official voice when approached by or when approaching local, regional and national authorities and ultimately to help grow businesses in the area and promote the town and surrounding area. Harleston's Future is a volunteer group founded by the Business Forum to ensure the continued prosperity and well-being of Harleston It organises regular events in the town, Heritage walks, film shows, and ever-changing displays of flags.

- 2.26 The community magazine is called the *Harleston Grapevine* and is distributed by volunteers each month to every household in Harleston. There are active Facebook groups including Harleston a Ray of Sunshine, Action for Harleston, Harleston Community Noticeboard, Just Ask in Harleston and District, What's Going on in Harleston and Waveney, Harleston's Future and Harleston Information Plus.

Housing

- 2.27 Data from the 2011 Census shows that there were 2,259 dwellings in Redenhall with Harleston and 2,176 households. 67.8 per cent of dwellings were owner occupied, 3.1 per cent shared ownership, 15 per cent socially rented, 12.8 per cent privately rented, and 1.2 per cent living rent free.
- 2.28 According to the property website Zoopla, the average price paid for a property in the last twelve months in the IP20 postcode is £217,211⁷.

Transport and Access

- 2.29 **Bus services** – there are three local bus services serving Redenhall with Harleston parish. Service 581 travels to Beccles from Diss via Harleston several times a day and is provided by Simonds. Service 84 runs to Norwich via Hempnall once a day and is provided by Konectbus. Service 38A travels from Harleston to Norwich several times a day via Long Stratton and is provided by First Bus. The Borderhoppa is a mini-bus service aimed at those who do not have easy access to personal transport and is open to all ages. The core service is 'Dial-A-Ride' which is pre-booked up to a week before travel, collects and delivers to home or local parish pickup point and runs on Mondays to Fridays.
- 2.30 **Railway** – the nearest rail station is in Diss, 17.5km from Harleston. It has regular trains to Norwich and London.

⁷ www.zoopla.co.uk. Accessed 11.11.2020.

- 2.31 **Walking and cycling** – the National Cycle Route 30 travels through Redenhall with Harleston parish. The Angles Way is a 150km long distance trail that runs along the Norfolk/Suffolk borders from Gt Yarmouth to Thetford and goes through Harleston.
- 2.32 **Car dependency** – the 2011 Census shows that the main method of travel to work by usual residents aged 16 to 74 years of Redenhall with Harleston parish is by car and that they travel on average 19km to work.
- 2.33 **Car parks** – are open all year round and are free to use. At the time of writing, there is one car park in front of the Co-op on Bullock Fair Close and there is an adjoining car park owned by South Norfolk Council and leased to Redenhall with Harleston Town Council. Each car park has two electric charging points. There is another car park at St. John's Church on Broad Street, also owned by South Norfolk Council and leased to the Town Council.

Environment and landscape

- 2.34 **Landscape character** – the South Norfolk Council Landscape Character Assessment identifies the southern part of Harleston with Redenhall parish as Character Area A5 Waveney Rural River Valley. The northern part of the parish is identified as Character Area B4 Waveney Tributary Farmland.
- 2.35 **Biodiversity and Geodiversity** – the parish contains both nationally and locally designated wildlife sites. Gawdy Hall Big Wood, Harleston Site of Special Scientific Interest is located to the north of Harleston town. This site consists of a large area of ancient woodland on poorly drained, chalky boulder clays, typical of South Norfolk. There are three County Wildlife sites in Redenhall with Harleston parish. These are CWS 79 Blake's and Ladies Grove, CWS 80 Shadow Hill and Chestnut Grove and CWS 81 Gawdy Hall Wood (part). There is also Roadside Nature Reserve 14 located in the northern area of the parish on Green Lane.

Rivers and flooding

- 2.36 The South Norfolk Site Specific Allocations and Policies Document (adopted 2015) states that inadequate sewerage infrastructure and surface water flooding are significant constraints in Harleston. During periods of intense rainfall, flooding can occur in the town centre.
- 2.37 The majority of the area of Redenhall with Harleston parish is at low risk of flooding from surface water. Some areas of Redenhall with Harleston are at

low, medium and high risk of surface water flooding. The areas near the River Waveney are at particular risk.

Business and Employment

- 2.38 The 2011 Census shows that 69.4 per cent of all usual residents aged 16 to 74 in Redenhall with Harleston are economically active, and that there are more skilled trades people in Redenhall with Harleston compared to South Norfolk and Norfolk.

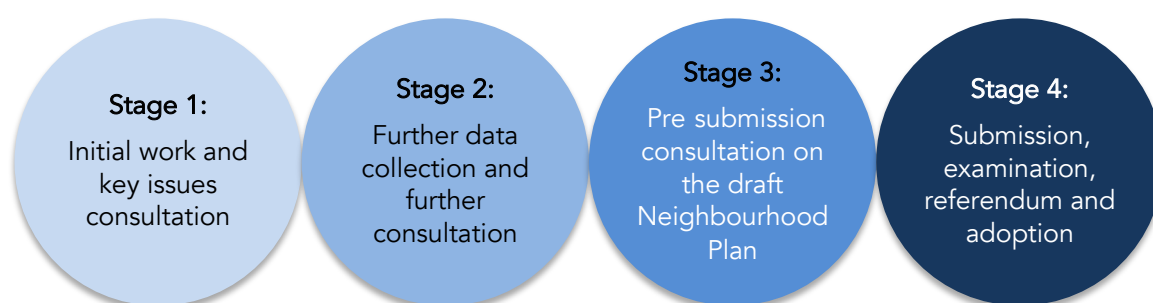


3. How the Plan was prepared

- 3.1 The Neighbourhood Plan Steering Group has prepared the Plan with support from a team of independent consultants. The process started in September 2020 when the Neighbourhood Area was designated.
- 3.2 The Plan has been commissioned by Redenhall with Harleston Town Council. Most of the funding has come from a central government Locality grant and a South Norfolk Council grant for Neighbourhood Plans.

Community engagement and consultation

- 3.3 The Redenhall with Harleston Neighbourhood Plan has been undertaken with community engagement and consultation. Due to COVID-19 restrictions, the Steering Group had to be innovative in their approach, using an online mapping application, Zoom meetings with stakeholders, a business survey, a household survey and a face-to-face exhibition. More details of all the consultation will be outlined in the Consultation Statement, accompanying the submission of the Neighbourhood Plan to South Norfolk Council in Autumn 2021.
- 3.4 Below is a summary of each of the four community engagement and consultation stages.



Stage 1: Initial work and key issues consultation (Autumn/Winter 2020/21)

- **Steering Group online workshops** (October 2020): Neighbourhood Plan aims and vision were drafted based on local knowledge of the Steering Group. Later revised after consultation with the community.
- **Placecheck** (Autumn/Winter 2020): an online application where the local community were invited to put a pin on the map of the parish stating 'things I like', 'things I don't like' and 'things we need to work on' and write a comment. 103 comments were made between October 2020 and March 2021. These were used to inform the objectives of the Plan.
- **Stakeholder engagement** (Autumn/Winter 2020): Steering Group meetings on Zoom or on the telephone with a range of organisations and individuals in the area, including: Harleston Arts Forum; Harleston Information Plus; the Historical Society; Durrant Estate Agents; Harleston Business Forum; Harleston Walkers; Harleston Jobs Club; St John the Baptist Church; Hope Church; Harleston Community Church; Harleston Masonic Group; Harleston and District Rotary Club; River Waveney Trust, Big Sky, a District Councillor and a County Councillor; and neighbouring parishes. Themes from the meetings were used to form questions for the household survey (see below) and also fed into policy writing.
- **Business survey** (Autumn/Winter 2020): hand delivered to business in the parish and online. 27 businesses responded. Used to inform policy writing.
- **Data profile for Redenhall and Harleston** (February 2021): document containing key data for the parish, to inform policy writing.
- **Character appraisal** (Autumn 2020): Steering Group split the built area of the parish into district character areas and described them in detail. The work fed into the Redenhall with Harleston Design Guidance and Code.



Data Profile

February 2021

Figure 6: Poster/flyer for Placecheck, used around the town, in the Grapevine magazine and on Facebook (left). Data Profile (right).

Stage 2: Further data collection and further consultation (Spring 2021)

- **Housing Needs Assessment** (February 2021): an independent assessment of housing needs for the parish, undertaken by AECOM. The report identifies suitable tenure, affordability and the need for Affordable Housing, type and size of housing need, and specialist housing for older people. Used to inform policy writing.
- **Household survey delivered** (March 2021): 8-page paper survey sent to households in the parish and available online through March 2021. 575 household responses were received, a 26.5 per cent response rate. Summary of results:
 - Independent shops and the countryside valued the most.
 - 25 per cent of respondents said their current home would not be suitable for their needs within the next 5 years. Most were looking to buy on the open market. A range of different housing is required.
 - Tree planting, off-street parking and pedestrian footpaths were key features that respondents identified as being needed in a new housing development. A range of buildings were identified as having significant local heritage value.
 - A range of green spaces were identified as needing protection, and list a of important community views were recognised.
 - The need for more doctors, school places, dentists and parking were identified. Also, indoor community provision of a community centre and outdoors open space of outdoor seating areas, informal green open space, and walking/cycling routes.
 - The majority of working respondents travel outside of Harleston for work. Parking is a key issue for business in the town. New businesses on the employment land would be welcomed.
- **Redenhall with Harleston Design Guidance and Code** (June 2021): design codes for the nine character areas covering the built up parts of Harleston and Redenhall, and for the major development sites. Undertaken by AECOM, to support the Neighbourhood Plan policies.

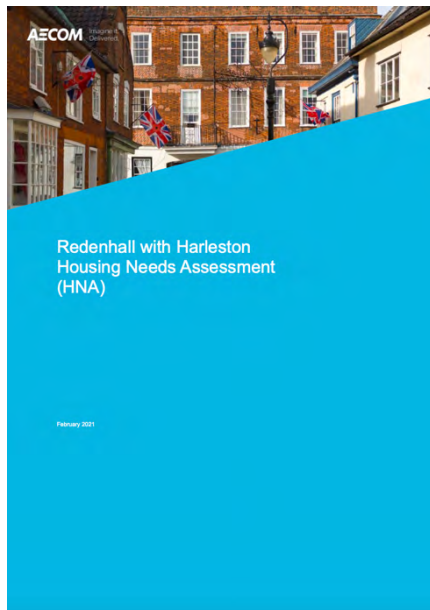
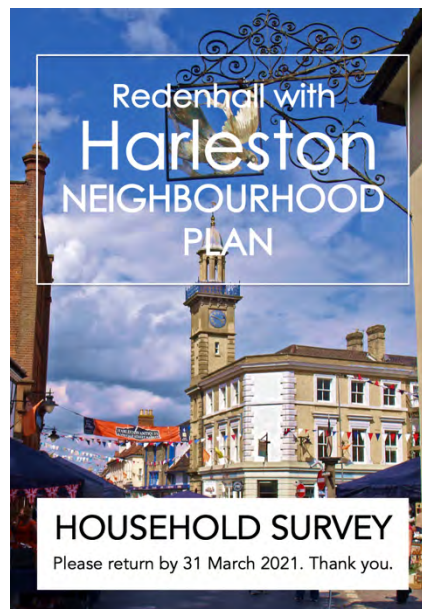


Figure 7: Redenhall with Harleston Housing Needs Assessment (left) and Redenhall with Harleston Design Guidance and Code (right).



Survey poster (left) and survey front cover (right).

Stage 3: Pre submission consultation on the draft Neighbourhood Plan (regulation 14) (Summer 2021)

- Draft Neighbourhood Plan was out for pre-submission consultation (from 24th July 2021 until 10th September 2021). Sent to statutory agencies and available for residents to comment.
- Consultation launched with an exhibition on 24th July at 10am to 4pm and 6pm to 8pm at the Swan Hotel including consultation response forms. Subsequently the documents and response form were available in at Harleston Library, Harleston Information Plan and on the Town Council website.
- 89 responses received including 18 from statutory consultees.
- All comments were collated and analysed (see Consultation Statement).



Figure 8: Front and back of poster/flyer for pre-submission consultation on the draft Neighbourhood Plan.

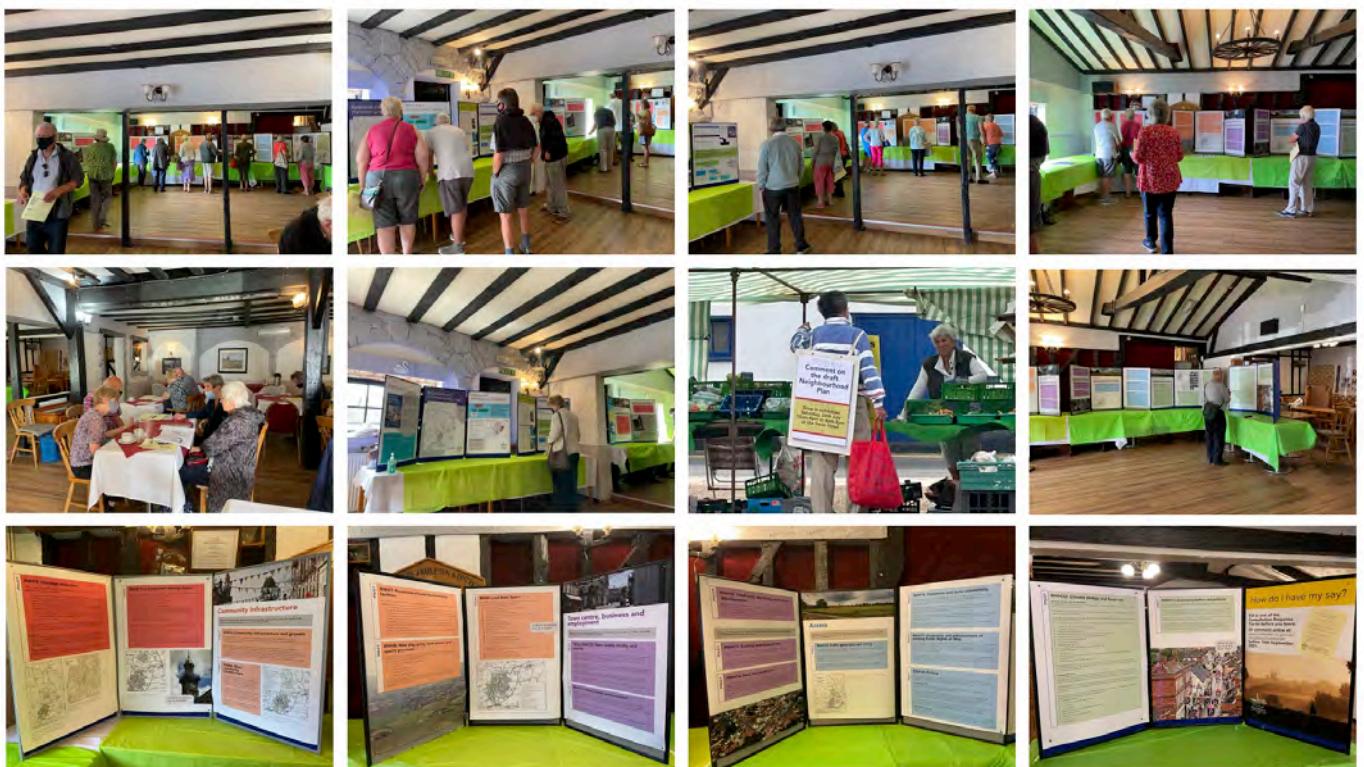


Figure 9: Photographs from the pre-submission consultation on the draft Neighbourhood Plan.

Stage 4: Submission, examination, referendum and adoption (Autumn 2021 to Winter 2021/22)

- Modifications were made to the Neighbourhood Plan, following pre-submission consultation.
- Submission of the Neighbourhood Plan to South Norfolk Council with supporting documents.
- Examination, Early 2022
- Referendum and adoption, Spring 2022.

Communication

- 3.5 Communicating with residents and businesses through the development of the Neighbourhood Plan was particularly important during the initial stages of forming an evidence base, as no face-to-face engagement could happen due to COVID-19.
- 3.6 The Town Council web page www.harleston-tc.gov.uk/neighbourhood-plan was set up to contain information about the developing Plan.
- 3.7 The Harleston Grapevine parish magazine, which is delivered monthly to every house in Harleston, has featured regular articles about the Neighbourhood Plan, made requests for feedback and comments at various stages, and has advertised the consultation event and the locations of the venues where a printed copy of the Neighbourhood Plan may be viewed.
- 3.8 Facebook, posters, flyers, A-boards and a sandwich board worn by a volunteer in the town were used to promote the work of the Neighbourhood Plan. An update for the Town Council on the Neighbourhood Plan progress was presented at monthly meetings. Regular monthly updates were supplied to Harleston Information Plus. The household survey was publicised on the local radio stations Park Radio and Harleston Breakfast Show.
- 3.9 A summary of the results of the household survey were made available on the Town Council website.



4. Vision and objectives

VISION

Harleston will continue to be a small, thriving and attractive market town with a community feel. It will have a range of housing types and tenures to suit all ages and incomes, supported by appropriate infrastructure and employment opportunities. Development will be sustainable, well designed, and suitably located, integrated and connected. The surrounding area will remain rural, and the natural environment and local heritage will be protected. The area will continue to be a desirable place to live, work and visit for current and future generations.

- 4.1
- It is important that any Neighbourhood Plan contains a short and simple vision statement which sums up the community’s aim for the future of the parish. The Neighbourhood Plan vision is an overarching statement describing what Redenhall with Harleston should be like at the end of the Plan period i.e., 2038. It has been developed with local people and has been refined and adapted through consultation. The result is a vision statement which captures the overarching spirit and ambition of the local community and the Neighbourhood Plan.
- 4.2
- The vision underpins the objective and policies of the Redenhall with Harleston Neighbourhood Plan and is referred to throughout.
- 4.3
- From the vision flows the different objectives of the Neighbourhood Plan and from there, the policies. The diagram below outlines this relationship.

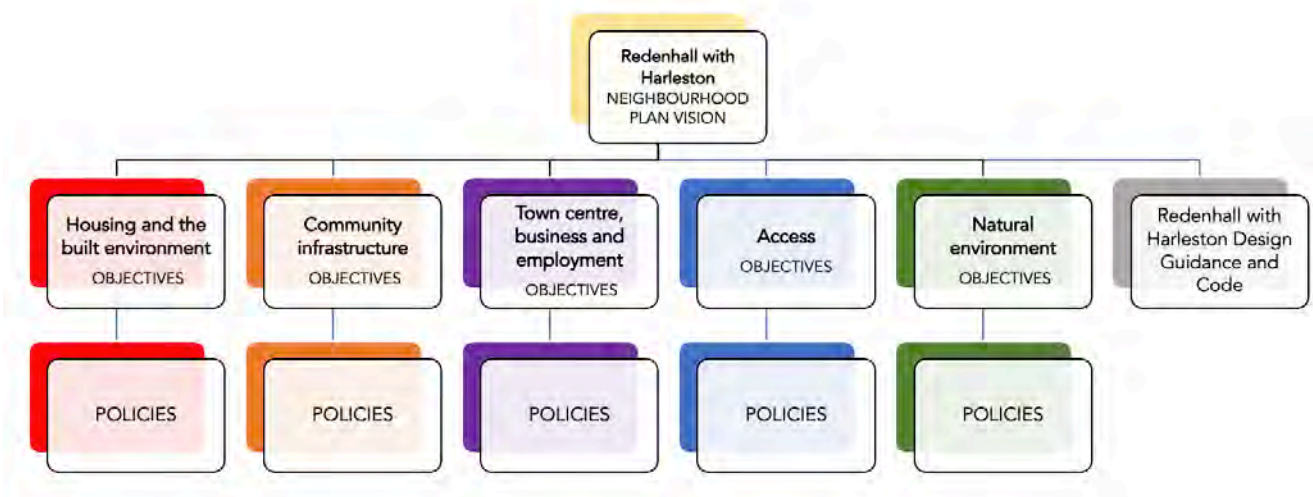


Figure 10 above: Structure of the Redenhall with Harleston Neighbourhood Plan.

- 4.4 The objectives of the Neighbourhood Plan are broad statements of intent which are there to help deliver the vision and link to the issues that Redenhall with Harleston is seeking to address. They have been drafted using themes picked up at an early stage and have been refined through the community consultation exercises.

Redenhall with Harleston Neighbourhood Plan objectives:

Objective 1: To ensure that new housing development is of an appropriate mix that meets the current and future needs of the town.

Objective 2: To achieve high quality, well-designed and environmentally sustainable new development which complements the distinctive character and heritage of Redenhall with Harleston.

Objective 3: To ensure that the provision of community infrastructure meets the needs of the whole community and keeps pace with new housing growth.

Objective 4: To reinforce the important function of Harleston Town centre as a viable, successful, accessible and attractive centre for residents and visitors.

Objective 5: To support new employment opportunities and encourage existing underused or unused employment sites to move forward.

Objective 6: To ensure new developments provide transport connections both to the town and to the wider countryside and to encourage safe and healthy access for pedestrians and cyclists within the development.

Objective 7: To protect and enhance the landscape setting of the town and the important natural assets of the surrounding rural parish and improve green infrastructure now and in the future.

5.0 Policies and projects

Introduction to policies

- 5.0.1 The vision and objectives have provided the framework to develop the policies in the Neighbourhood Plan. Each policy relates to a particular objective under the following five themes: Housing and the built environment; Community infrastructure; Town centre, business and employment; Access; and Natural Environment.
- 5.0.2 The Neighbourhood Plan is first and foremost a land-use document for planning purposes. All policies in the Plan have been derived from a series of consultation exercises, stakeholder engagement and desk research, which provide the justification and evidence base for their selection.
- 5.0.3 The Neighbourhood Plan policies follow the government's guidance. They exist to:
- Set out locally led requirements in advance for new development in the parish.
 - Inform and guide decisions on planning applications.
 - Ensure that the multitude of individual decisions add up to something coherent for the area as a whole⁸.
- 5.0.4 To aid interpretation for decision makers and planning applicants, each policy is accompanied by supporting text, which includes context for the theme, the views of residents, guidelines and reference to strategic plans. This is set out before each of the policies.

Redenhall with Harleston Neighbourhood Plan policies:

Housing and the built environment POLICIES

RWH1: Housing mix
RWH2: High quality design
RWH3: Heritage protection
RWH4: Non-designated Heritage Assets

⁸ Tony Burton, Writing Planning Policies, Locality.

**Community
infrastructure
POLICIES**

RWH5: Community infrastructure and growth
RWH6: New community infrastructure
RWH7: Protection of existing community facilities
RWH8: New play areas, open spaces and sports provision
RWH9: Local Green Spaces

**Town centre,
business and
employment
POLICIES**

RWH10: Town centre vitality and viability
RWH11: Town centre enhancement
RWH12: Small scale, day-to-day retail in new developments
RWH13: Existing employment sites
RWH14: New live-work units

**Access
POLICIES**

RWH15: Traffic generation and safety
RWH16: Pedestrian and cycle connectivity
RWH17: Protection and enhancement of existing Public Rights of Way
RWH18: Parking

**Natural
environment
POLICIES**

RWH19: Landscape character and town gateways
RWH20: Important public views
RWH21: Natural assets
RWH22: Climate change and flood risk
RWH23: Landscape buffers and pollution

Potential community projects

5.0.5 The Neighbourhood Plan is principally concerned with land use planning matters. However, two specific issues have arisen through discussion with local stakeholders, responses to emerging policy ideas and discussion within the Steering Group, which are not within the scope of the Neighbourhood Plan, but which are of legitimate interest to the community. These can be found in **Appendix B**.



5.1 Housing & the built environment

Objective 1: To ensure that new housing development is of an appropriate mix that meets the current and future needs of the town.

Scale and delivery of new housing

- 5.1.1 Government guidance advises that Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area. In addition, they should support the delivery of strategic policies contained in local plans and should shape and direct development that is outside of these strategic policies. Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.
- 5.1.2 The issue of new housing is often a key determinant in the decision by a local community to embark upon the production of a Neighbourhood Plan. The issue of future housing development in Redenhall with Harleston is a key issue for the town over the next 16 years, particularly its potential impacts upon the people, services and environment of the town.
- 5.1.3 The 2011 census indicate that there were 2,259 dwellings within Redenhall with Harleston. Data provided by South Norfolk Council (SNC) indicates that between April 2011 and March 2020, 249 new homes were built in the parish. The total quantity of dwellings in the parish as of March 2020 is therefore estimated to be 2,508.
- 5.1.4 Redenhall with Harleston has a deliverable housing commitment as part of the emerging Greater Norwich Local Plan (GNLP) of 727, for the period up to

2038. This figure is composed of new allocations for 555 homes, one carried forward allocation for 95 homes, 44 units completed between April 2018 and March 2020, and 33 units having planning consent as of April 2020. The 33 units with consent noted in the GNLP do not include a more recent July 2020 approval (with conditions) for 46 houses in the parish.

- 5.1.5 The existing adopted strategic policies for Redenhall with Harleston can be found in the Greater Norwich Joint Core Strategy adopted in 2011 and amended in 2014, the South Norfolk Development Management Policies (2015) and the Site-Specific Allocations and Policies Document (2015). As referred to in earlier sections, South Norfolk Council is in the process of replacing these documents with a new Local Plan, the GNLP.
- 5.1.6 Both the adopted JCS and the emerging GNLP policies identify Redenhall with Harleston as a 'Market town' in the settlement hierarchy and as such it is expected to deliver a specified level of new growth over the plan period. Some of the existing allocations from the JCS that have not yet been completed have been rolled forward into the emerging GNLP together with additional allocations. Due to the location of Redenhall with Harleston in the settlement hierarchy, the Local Plan has identified the housing requirement for the town and also has identified sufficient land to meet this housing requirement. The most recent version of the GNLP identifies two new additional allocations at Briar Farm (405 dwellings) and land south of Spirketts Lane (150 dwellings). It is also recognised that there will be additional 'windfall development' which will also come forward during the Neighbourhood Plan period. Following early feedback from the community, the Town Council has therefore taken the view that the Neighbourhood Plan will not make further allocations for new housing development but instead will focus its policies on managing the impacts of this level of development over the plan period. The Neighbourhood Plan also does not intend to alter the current adopted Settlement Boundary for the town and therefore will use the adopted version for the purposes of the policies in the Neighbourhood Plan.

Housing need and mix

- 5.1.7 As well as housing numbers, the size, type and tenure of any new housing is also a key issue for local communities in respect of new housing. The specific mix of housing will clearly have an impact on the existing community and therefore careful thought needs to be applied to determining that mix.
- 5.1.8 Delivering a wide choice of high-quality homes is essential to support a sustainable, vibrant, and mixed community. Community consultation, including

the results from the questionnaire carried out in March 2021, revealed that residents want to have a range of types of accommodation to meet their changing needs and to cater for any needs that are currently not being met. Residents expressed a clear preference (73 per cent) for the opportunity to own their own home, with the second choice – renting from a social land- lord at 27 per cent. In terms of the size of property the community preference was very much for 2-bedroom properties in the form of starter housing and bungalows. There was also support for 3–4-bedroom family housing (although affordability was quoted as an issue), supported/sheltered housing but the respondents expressed limited interest in flats/apartments. New homes should be of high quality, accord with environmental design standards and meet community aspirations for new and existing residents.

- 5.1.9 In Winter 2020, the Steering Group commissioned a Housing Needs Assessment (HNA) which was completed in February 2021, to explore the issues of housing type and tenure in more detail. The work was undertaken by consultants AECOM and the final report is a submission document that supports this Neighbourhood Plan.
- 5.1.10 The HNA reveals that Redenhall with Harleston’s current tenure mix does not reveal any major imbalances. Home values have steadily increased over the last ten years, with the result that the average entry-level home now costs around £55,000 more than in 2013 (before which the market was stagnant, with the same average price since 2010). The average growth rate for all housing in Redenhall with Harleston between 2010 and 2019 was 58 per cent. There is a premium on newly built housing locally, with a lower quartile new home costing roughly the same as a median home in the second-hand stock.
- 5.1.11 AECOM has estimated the annual income required to afford various tenures of housing in the parish. These thresholds are compared to local incomes to determine which options are the most appropriate for local people going forward. The average household income in Redenhall with Harleston is £39,600, and the lower quartile income (per person) for South Norfolk is £13,673. It was found that a household would need an income comfortably above the average (or a very large deposit) to qualify for a mortgage even for an entry-level home in the parish. Home ownership through the mainstream market is not an option for the majority of local people.
- 5.1.12 Private renting is affordable for households on average incomes and just about accessible to households with two lower quartile earners. Broadly speaking, anyone earning between £26,800 and £46,157 can afford to rent but not to buy.

Affordable Housing

- 5.1.13 The new dwellings allocated in the GNLP should deliver at least 214 units (33 per cent) of Affordable Housing in the parish, though this may be exceeded if other sites are delivered within the Neighbourhood Plan period. AECOM recommended that, assuming the GNLP is adopted as drafted, at least 65 units in the parish should be provided as affordable home ownership, with the remaining 149 defaulting to affordable rented housing. However, the GNLP does not set out a firm Affordable Housing tenure mix and there is therefore potential for the Neighbourhood Plan to add greater specificity on this issue beyond the wider NPPF requirement for 10 per cent of all housing to be for affordable home ownership. As noted above, based on average incomes, Redenhall with Harleston has a high potential demand for affordable home ownership.
- 5.1.14 The HNA did not recommend limiting the future provision of affordable rented housing for the following reasons: there is currently a backlog of need from 29 households; the wider district continues to have need; and economic circumstances could change, or the assumptions used within the HNA for turnover in the stock used may not be borne out in practice. However, there is justification to seek a higher proportion of affordable home ownership than the minimum of 30 per cent (of the affordable total) sought in the GNLP. Furthermore, as noted above, a majority of affordable home ownership products have been found to be helpful in widening housing access to those earning at and below the average locally.

Dwelling size

- 5.1.15 The parish is expecting a substantial volume of new development during the Plan period. It would be unwise for this to be delivered in an unbalanced way (e.g. with too much emphasis on large homes). Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of options. It is also overly simplistic to think about home sizes in terms of the number of bedrooms offered. There is a significant contrast between a 4 bedroom 'executive' home with a luxury specification on a large rural plot and a 4-bedroom townhouse suitable for a large family on a lower income within walking distance of local schools.
- 5.1.16 While the large cohort of older households expected to be present by 2038 may wish to downsize from their existing homes, there is already a plentiful stock of 2- and 3-bedroom homes in the parish, and 1-bedroom homes are unlikely to be appealing to most older households. To best meet their needs, it

should be considered whether the existing options are well tailored to older people's requirements in terms of space, flexibility, quality, location and accessibility. If not, further 2–3-bedroom homes, if well-designed, would make a valuable contribution to the existing mix.

5.1.17 Therefore the Neighbourhood Plan should encourage for all sizes of home to be provided in Redenhall with Harleston in future years. In particular, encouragement is given for additional provision of appropriately priced larger homes to address the present undersupply and accommodate families. However, this should be done as part of a dwelling size mix that is balanced overall and which meets the needs of a growing older population as well as those currently priced out of the market.

5.1.18 It is also important that consideration is given in policy to qualitative evidence from the household survey, about the needs of local people and the community's wider priorities. The following **Policy RWH1** has therefore drawn on evidence both from the HNA and the results of the household survey.

RWH1: Housing mix

Proposals that provide for a range and mix of all housing sizes, in order to maintain a balanced and inclusive community and meet local needs (both current and future) will be supported.

The mix of new housing in the parish will be provided in accordance with current and future local needs identified in the AECOM Housing Needs Assessment produced in February 2021, and the most up to date Strategic Housing Market Assessment and community preferences expressed in the Neighbourhood Plan Household Survey.⁹ Consideration will also be given to any Local Plan site-specific policy allocation requirements, and/or site-specific opportunities and constraints.

Particular support will be given to the provision within a mixed development of:

- 1-bedroom properties for sale and rent.
- 2- and 3-bedrooms homes for sale and rent.
- Some 4-bedroom homes including some offered as Affordable Housing for Rent within walking distance of local schools.
- Homes suitable for older people, such as extra care housing, retirement housing, sheltered housing capable of adaptation to meet the needs of older people with disability or limited mobility.
- Affordable Housing.¹⁰
- Opportunities for self-build or custom build properties.

Affordable Housing

The composition of affordable housing should comprise a suitable mix of:

- Routes to home ownership.
- Affordable Housing for Rent.

⁹ AECOM Housing Needs Assessment 2021 or successor document.

¹⁰ For definition see glossary.

Objective 2: To achieve high quality, well-designed and environmentally sustainable development which complements the distinctive character and heritage of Redenhall with Harleston.

The importance of design

- 5.1.19 One of the determinants of whether any new development is successful or not will be dependent upon how well it is considered to integrate with its surroundings. Matters such as design, impact on local character. Layout and scale are the most common issues that will cause the local community concerns about any proposed new development. If a community believes that it has been involved in and been able to influence the design of a development at an early stage, the higher the likelihood that the development will be considered to be acceptable.
- 5.1.20 Whilst to an extent design and impact on local character are subjective judgments, these can be influenced by breaking design elements down into component parts and attempting to address them. Whether a proposed new development relates well to and enhances the existing character and context, is one of the most common judgments to be made, yet there is often very little evidence or guidance to assist local people in making that judgement.
- 5.1.21 A key purpose of the Neighbourhood Plan is not only to help influence the designers and proposers of development at an early stage of formulating their proposals, but also to help promote an understanding of what elements make up the character of the area and what constitutes good design that respects local character.
- 5.1.22 Government guidance places considerable emphasis on achieving well-designed places. Paragraph 126 of the NPPF¹¹ describes it as fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development proposals acceptable to communities. Effective engagement between applicants, communities and local planning authorities is essential.
- 5.1.23 Paragraph 127 of the NPPF states 'Design policies should be developed with local communities so that they reflect local aspirations and are grounded in an

¹¹ National Planning Policy Framework – see Glossary.

understanding and evaluation of each area's defining characteristics.' Neighbourhood Plans can play an important role in identifying the special qualities of an area and how they should be reflected in development.

- 5.1.24 In addition, the NPPF makes clear that local planning authorities should ensure that visual tools such as design codes and guides are used to inform development proposals to provide maximum clarity about design expectations at an early stage and reflect local character and preferences. They should provide a framework for creating high-quality places, with a consistent and high-quality standard of design to inform development proposals. It also makes clear that the level of detail and degree of prescription within design codes and guides should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety where this would be justified.
- 5.1.25 Design coding is one tool available to local planning authorities, communities, and developers to define and deliver design quality, in addition to design guides, planning briefs, heritage characterisation studies, standards and masterplans as set out in the NPPF and planning practice guidance. A design code is a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.
- 5.1.26 In February 2021, the Town Council commissioned consultants AECOM to undertake a Design Code and produce some Design Guidelines for the Parish. This work was completed in June 2021 and is an addendum to the Neighbourhood Plan. The work has been used to inform **Policy RWH2** below.
- 5.1.27 The Design Code built on the Character Appraisal work of the Steering Group and undertook a detailed analysis of the local character of the parish, developed some strategic design guidelines and identified a palette of materials which should influence the design of future development. In addition, the report provided specific guidance to be used by the Town Council when assessing and responding to consultation in future planning applications for new development.
- 5.1.28 The household survey asked residents for their views on design, which sparked the receipt of a wide range of views on a number of issues. Key issues that it was felt needed to be adequately addressed in the design of new housing development included parking, garden size, house design, plot size, garaging, access for emergency vehicles and play areas. It has therefore been important

to ensure that the Design Code work undertaken by AECOM reflects these key issues.

POLICY

RWH2: High quality design

Development proposals should be consistent with the principles laid out in the Redenhall with Harleston Design Guidelines and Code, which is an addendum to the Neighbourhood Plan.

The design of all new development should reflect Redenhall with Harleston's local distinctiveness and character and seek to enhance its quality.

The design of all proposals should be based on an understanding of the context of Harleston. All proposals for new development should respect the scale, materials, form, function, and character of the existing and surrounding buildings in the area.

Heritage protection

5.1.29 Redenhall with Harleston parishes possesses a high quality and varied historic environment with a wealth of historic buildings and structures concentrated within the historic core of the Town Centre which is reflected in its designation as a Conservation Area. The Conservation Area was designated in 1975 and South Norfolk Council undertook an appraisal of it in 2016, resulting in the production of some management guidelines.

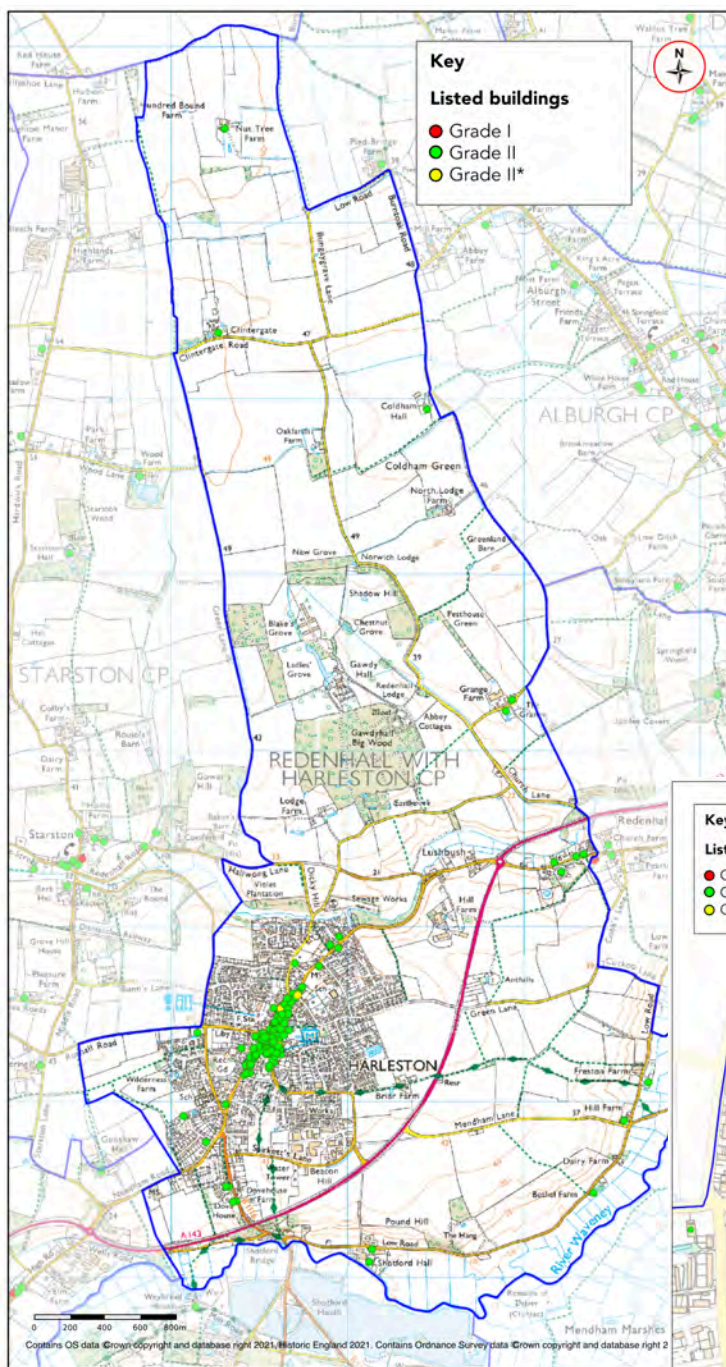


Figure 11: Listed buildings across the parish (source: Parish Online, with own annotations). Blue line denotes parish boundary.

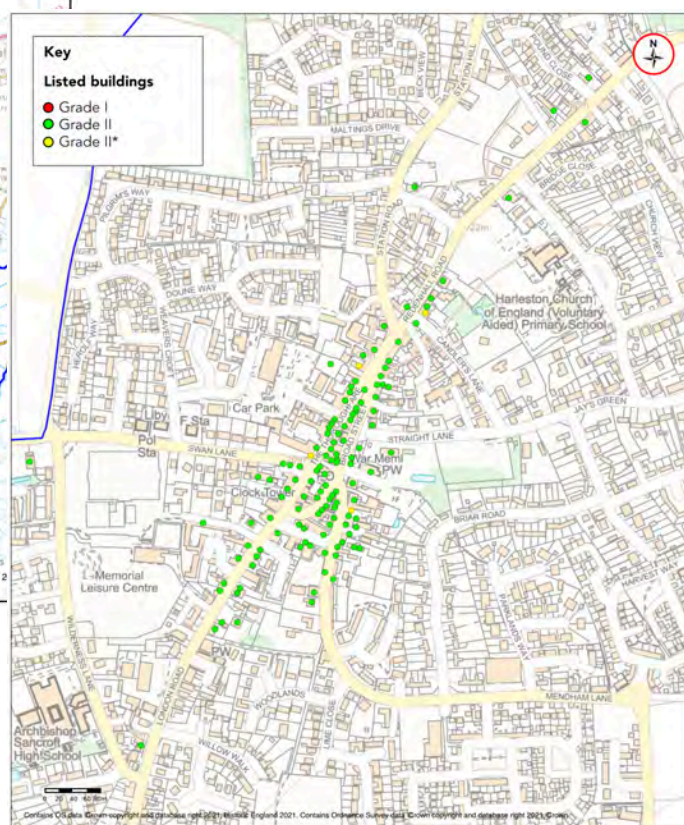


Figure 12: Listed buildings in the town centre (source: Parish Online, with own annotations). Blue line denotes parish boundary.

5.1.30 The Conservation Area Appraisal notes that within the town there is a rich tapestry of different styles and use of building materials, with many interesting decorative features. There are many hidden treasures: houses have earlier medieval fabric hidden behind rendered frontages or later Georgian brick facades. A walk through a carriage archway often reveals an historic yard with picturesque charm. Even with the arrival of the railway in the mid-19th century the town remained relatively compact around the historic core, only beginning to rapidly expand during the later 20th century. As a result, higher status houses within the centre, such as Caltofts, have retained their landscaped gardens; and side roads, such as Candles Lane, retain a very rural character.

5.1.31 A number of the recommendations in the Conservation Area Appraisal are reflected in **Policy RWH3** below.

RWH3: Heritage protection

The special character of Harleston Conservation Area and its setting will be preserved and enhanced. This will be achieved by:

- a. Proposals for new development and alterations to buildings within the Conservation Area will be supported only when they are in harmony with any distinctive features of the buildings which contribute to the overall character the Conservation Area, whether they are listed or not, and when they maintain any details which contribute to the area's local distinctiveness e.g., doors, windows, and the surfacing of yards. Where yards are resurfaced (other than permitted development), care should be taken in the selection of materials to ensure an approach consistent with current characteristics. The materials for new surfaces should be chosen carefully, in order, to provide sustainable drainage solutions.
- b. A proposed development which adversely affects views into or out of the Conservation Area will not be supported.

Proposals affecting the Conservation Area should be consistent with the principles laid out in the Redenhall with Harleston Design Guidance and Code and the Harleston Conservation Area Character Appraisal and Management Guidelines 2016.

Signage

Where new or reconfigured advertising signage (including highways and directional signage) is proposed, consideration must be given to its size, design, and siting to ensure that it does not detract from the character and appearance of the Conservation Area. Proposals that seek to rationalise or reduce the amount of signage within the Conservation Area will be supported.

Street Furniture

Proposals seeking to enhance the streetscape and public spaces through appropriate use of street furniture¹² which preserves and enhances the area will be supported.

Non-designated Heritage Assets

5.1.32 The Government's Planning Practice Guidance (PPG) recognises that there are buildings, monuments, sites, places, areas or landscapes identified as having a

¹² Including, but not limited to, high quality lighting, railings, seating, litter bins, bollards, and cycle racks.

degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some Non-designated Heritage Assets as 'locally Listed'. The PPG goes on to explain that these can be identified through Local Plans (and now most commonly through Neighbourhood Plans) and can be a positive way for the local community to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development.

- 5.1.33 The NPPF 2021 at paragraph 202 indicates that the effects of an application on the significance of a non-designated heritage assets should be taken into account in determining the applications.
- 5.1.34 The Neighbourhood Plan survey undertaken in March 2021, asked a specific question in respect of local heritage and asked the community to identify any buildings or structures which they felt were of local importance and significance in terms of their heritage value. 185 responses were received to the specific question and over 30 candidates were identified. In addition, there was clear support for the inclusion of a policy within the Neighbourhood Plan that would seek to identify Non-designated Heritage Assets and also to protect their heritage value including their setting.
- 5.1.35 All of the suggested nominations for Non-designated Heritage Assets have been assessed against criteria based on the Local Heritage Listing: Historic England Advice Note 7, page 9. The results of this exercise are shown in **Appendix C** and those buildings/structures that are considered to score well when measured against the criteria are included in **Policy RWH4** below:

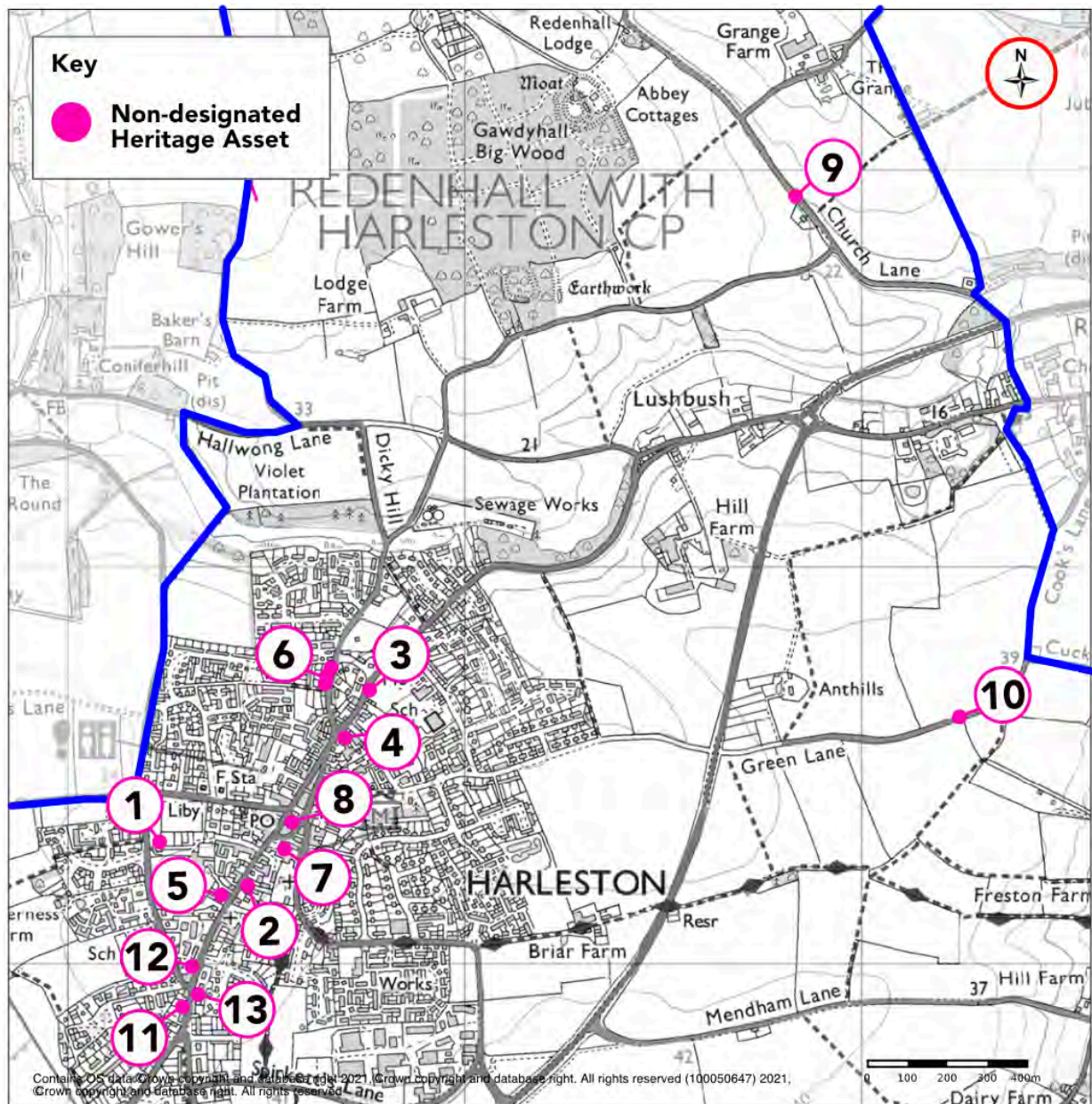


Figure 13: Non-designated Heritage Assets (source: Parish Online, with own annotations). Blue line denotes parish boundary.

RWH4: Non-designated Heritage Assets

The following buildings or structures (shown in figure 13) are identified as Non-Designated Heritage Assets due to their locally important character and historic features:

1. Spigot Mortar base on the Recreation Ground.
2. Pillbox in the garden of The Beeches, London Road.
3. Milestone built into the wall on Redenhall Road.
4. Former Police Station and Jail on Redenhall Road.
5. 30 – 38 (evens) London Road, a Victorian Terrace of five 3-storey properties.
6. 11-29 (odds) Station Road, 5 pairs semi-detached, Edwardian 3 storey properties.
7. Cast iron cart weighbridge in the carriageway of Exchange Street.
8. Harold's stone in Stone Court.
9. WWI air crash memorial in Church Lane Redenhall.
10. WWII American air crash (1945) memorial in Green Lane.
11. The Former Cherry Tree Public House (now Momiji restaurant) on London Road.
12. Stone Villa on London Road.
13. Holly House on London Road.

Development proposals should avoid harm to these heritage assets having regard to their character, important features, setting and relationship with surrounding buildings or uses.

Proposals should demonstrate that consideration has been given to retaining:

- a. The important asset or historic feature itself.
- b. Its most distinctive and important features.
- c. The positive elements of its setting and its relationship to its immediate surroundings.
- d. The contribution that the building or historic feature and its setting makes to the character of the local area.



5.2 Community infrastructure

Objective 3: To ensure that the provision of community infrastructure meets the needs of the whole community and keeps pace with new housing growth.

Vibrant and healthy communities

- 5.2.1 The overarching social objective of the planning system as set out in the NPPF is to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, with accessible services and open spaces that reflect current and future needs and support the health, social and cultural well-being of communities.
- 5.2.2 In order to achieve this, planning of new development must go hand in hand with planning for the community services and facilities that need to be in place to support development and meet the needs of residents. This includes transport, education, library provision, green infrastructure, sports facilities, local shops, footways and cycleways, allotments, fire hydrant provision, health services and a range of cultural facilities. These together are described as 'community infrastructure'. Housing and other development will be expected to contribute towards improving local services and infrastructure through either the payment of a Community Infrastructure Levy (CIL); planning obligations (via a Section 106 agreement/Section 278 agreement); or use of a planning condition.
- 5.2.3 The NPPF requires that the levels and types of infrastructure required to support growth should be set out clearly in strategic policies e.g., the Local Plan.

5.2.4 Presently Redenhall with Harleston is relatively well served by community infrastructure. There are primary and secondary schools, a doctors' surgery with dispensary, bank, Post Office, library, dentist, vets, local shops, garage, restaurants, takeaway restaurants, cafes, bars, pubs, places of worship, day care facilities, play areas, indoor sports facilities including a gym, recreation ground, tennis courts, sports pitches, and two free car parks. However, as the population of the parish increases a number of these services are either at or nearing capacity. Therefore, with at least 700 new houses expected in the parish since March 2020 up to 2038 there may be a need for new, improved, or reconfigured facilities, in order to at least maintain the quality of life for the whole community.

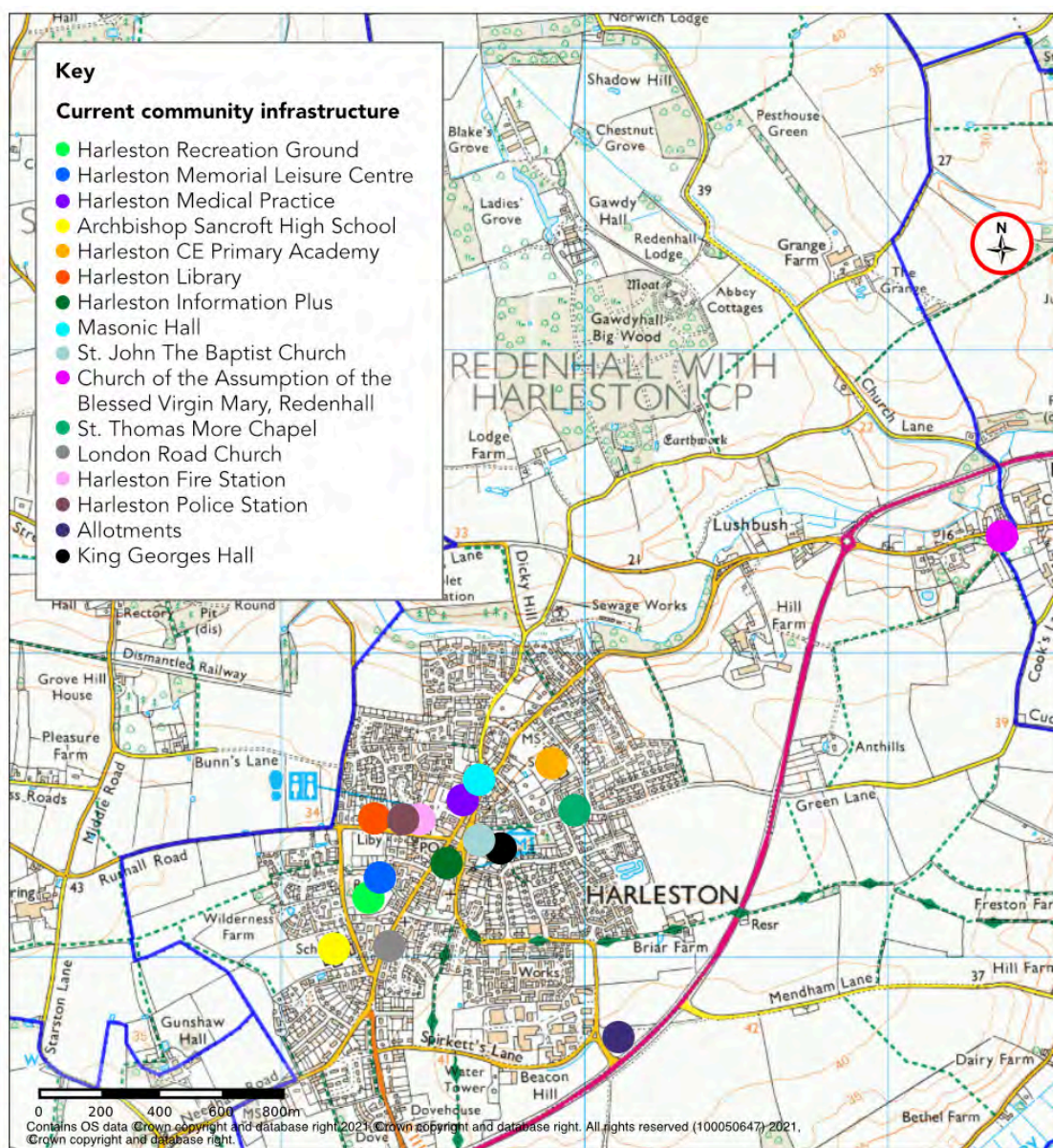


Figure 14: Current community infrastructure (source: Parish Online, with own annotations). Blue line denotes parish boundary.

- 5.2.5 Whenever the prospect of housing growth is discussed, it is inevitable that there will be concerns expressed about how the vital community infrastructure needed to support a viable community will keep pace with the expected population growth. It is essential that thought is given to community infrastructure at an early stage and that the needs of the current community, the capacity of existing services and the anticipated needs of new residents are taken into account.
- 5.2.6 This was very much reflected in the results of the household survey. Concerns about the capacity of doctors was mentioned 349 times with responses using the word surgery 124 times. In addition, concerns over dentists (195), educational provision (293) and parking (83) were raised. Many responses also raised the need for a new medical centre offering services in addition to the present GP surgery.
- 5.2.7 The precise detail of community infrastructure provision required to support the allocated growth through the GNLP will be determined through the Local Plan process. The current Local Plan policy requires some specific infrastructure from development (e.g. recreation) and developers then pay Community Infrastructure Levy (CIL) to cover other infrastructure requirements. It is rare for the developer to provide the infrastructure themselves. On larger developments the developer would usually make land available for the relevant infrastructure provider.
- 5.2.8 However, the Town Council has been mindful throughout the Neighbourhood Plan process that uncertainty around infrastructure provision is unsettling for the community and also that large scale new community infrastructure can take time to be agreed both in terms of the exact provision and how it is funded. The Town Council believes that developers should work proactively to ensure that the timing of new infrastructure coincides with the timing of growth and is planned well in advance rather than seen as an afterthought and this is an important element of **Policy RWH5** below.

RWH5: Community infrastructure and growth

New development will be supported if it can be demonstrated that sufficient supporting infrastructure (physical¹³, medical¹⁴, educational¹⁵, green¹⁶, and digital¹⁷) will be made available to meet the needs of that development.

Where an infrastructure deficit currently exists, new development should not exacerbate that deficit. Infrastructure providers, in liaison with developers, should be able to demonstrate that there are definitive plans in place to increase the capacity and provision of relevant infrastructure ahead of any unmet need being generated by new development taking place. Where a need for new infrastructure is identified to meet the needs of new development, developers should provide for or support the delivery of it in order to maintain the quality of life for the community.

New community infrastructure

5.2.9 The Neighbourhood Plan is able to influence provision and there is community support for shared spaces and shared facilities in order to maximise access. Community Infrastructure provision that provides for usable and adaptable spaces that would suit the needs of a range of potential services providers will be supported.

5.2.10 Where, as a result of new development land or buildings are to be made available for community use this will be supported. The Town Council would be keen to consult with the local community on specific proposals to ensure that the most appropriate community use for the land or buildings is identified. Where proposals come forward for existing buildings, or land in current community use, which seek to widen the scope of community uses available these will also be supported.

5.2.11 The NPPF states that planning policies should promote social integration including opportunities for meetings between people who might not otherwise come into contact with each other and to provide the social, recreational, and cultural facilities and services that the community needs. Plans should guard

¹³ Physical – drainage, sewerage, water supply, highways.

¹⁴ Medical – GP surgeries, health and social care provision, dentists.

¹⁵ Schools, nursery, early years provision.

¹⁶ Open spaces, play areas, informal green areas.

¹⁷ Broadband, mobile phone signal.

against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. Facilities and services should be able to develop and modernise and be retained for the benefit of the community.

POLICY

RWH6: New community infrastructure

Proposals that provide for community space(s), that support health and social care services, new or improved education provision, meeting spaces, community cafés and other community infrastructure will be supported in principle.

Where development proposals result in land or buildings being offered for community uses, consultation with the community will be carried out to establish the most appropriate community uses for that land or building.

Proposals that would enable the wider future community use of existing buildings will be supported.

Existing community facilities

5.2.12 In addition, existing community facilities (meeting places, sports venues, cultural buildings, places of worship, educational services) will be protected from development that may reduce their community value. It is accepted that the needs of service users may change over time and therefore some existing services may no longer be viable later in the Plan period, in their current form. **Policy RWH7** below does not seek to protect unviable services in perpetuity but requires that the lack of viability be demonstrated and for alternative configurations of provision to be investigated before alternative proposals are approved.

RWH7: Protection of existing community facilities

Proposals that would result in the loss of an existing community building or facility (either through redevelopment or change of use) will be supported where:

- a. It can be demonstrated that the need for the building, use or facility no longer exists, or
- b. It can be demonstrated that the facility is no longer considered viable by the owner and that the community have been previously offered the chance to buy or lease the building, use or facility at market rates in order to keep it in community use, or
- c. It can be demonstrated that suitable alternative provision exists in an equally or more accessible location elsewhere in the town and that the capacity of the alternative provision is sufficient to accommodate community requirements currently provided by the existing building, use or facility, or
- d. Where the existing provision will be lost as a result of new development, suitable alternative provision will be delivered by the new development.

Sport and recreation

5.2.13 With the expected number of new dwellings to be built within the parish up to 2038 to be over 700 dwellings, there will be a need for new open space to be provided within new developments to meet the recreational, amenity and wellbeing needs of residents.

5.2.14 Open space should be fundamental in planning for new development. Open space, which includes all open space of public value, can take many forms, from formal sports pitches to open areas within a development, linear corridors, and country parks. It can provide health and recreation benefits to people living and working nearby; have an ecological value and contribute to green infrastructure as well as being an important part of the landscape and setting of built development, and an important component in the achievement of sustainable development. It is for local planning authorities to assess the need for open space and opportunities for new provision in their areas. Planning policies should aim to achieve healthy, inclusive, and safe places, which promote social interaction and opportunities for meetings between people who may not otherwise come into contact with each other.

- 5.2.15 It is acknowledged that smaller developments may generate very little green space and therefore it may not be practicable or desirable for on-site provision to occur; in such cases a contribution towards off-site provision in line with South Norfolk Council's adopted open space standards will be made.
- 5.2.16 For larger developments the quantity of open space provided should be sufficient to meet the needs of the intended residents but also the quality of the space is important. New high-quality open spaces should be designed with the end users in mind; they should be easily accessible from all parts of the development they are intended to serve. They should be usable and well-designed spaces with community safety embedded into the design with good natural surveillance and waste facilities. Where spaces are intended for general use, they should be designed for a range of age groups. Other spaces may be required to meet a specific identified need and will be tailored to a specific age group.
- 5.2.17 Access to a high-quality network of open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Planning policies should be based on up to date and robust assessments of the need for sport and recreation facilities (including quantitative and qualitative deficits or surpluses) and opportunities for new provision. Information gained from these assessments should be used to determine what sport and recreational provision is needed.
- 5.2.18 The NPPF advises at paragraph 99 that existing sport and recreational buildings and land including playing fields should not be built on unless it can be demonstrated that it is surplus to requirements, it can be replaced by equivalent or better provision or the proposed development is for alternative sports and recreation provision, the benefits of which clearly outweigh the loss of the current or former use.
- 5.2.19 Community consultation highlighted support for new or improved sports provision, children's play areas, as well as a range of indoor and outdoor meeting places and spaces. It is important that any new provision meets the needs of the intended users and that appropriate changing facilities, storage for equipment and parking is available. New sports provision should be easily accessible to all users whether arriving on foot, by bicycle, public transport or the private car.

RWH8: New play areas, open spaces, and sports provision

Proposals for new or improved sports and leisure facilities in Harleston, such as new sports pitch provision and multi-use all weather games areas, will be supported. Particular support will be given to proposals that provide facilities for:

- New children's play areas and spaces.
- Allotments.
- Community Orchards.
- New wildlife areas.
- Outside meeting spaces.

New sports and leisure facilities should be located within easy access of the community that they serve. Such facilities should be easily accessible by pedestrians and cyclists and provide for sufficient car parking.

Local Green Spaces

5.2.20 The National Planning Policy Framework 2021, at paragraphs 101-103 introduces the concept of Local Green Spaces which can be identified through neighbourhood plans by local communities and allows green areas identified as being of particular importance to be protected. Paragraph 102, sets out 3 broad criteria for identifying and designating such spaces as follows:

'The Local Green Space designation should only be used when the green space is:

- a) in relatively close proximity to the community it serves.*
- b) demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field) tranquillity and richness of its wildlife: and*
- c) local in character and not an extensive tract of land'.*

5.2.21 The NPPF at paragraph 103 then goes on to state that 'policies for managing development within a Local Green Space should be consistent with those for green belts' and therefore affords them a very high level of protection. It is also clear that the designation of Local Green Spaces should not be used as a mechanism to try to block or resist development on agricultural land immediately adjacent to village development boundaries and that a successful designation must meet the criteria outlined above.

- 5.2.22 Such spaces can be viewed locally as equally as important as the landscape setting of an area. Such spaces are green spaces found within the built-up area that contribute to the character of a settlement. These can vary in size, shape, location, ownership and use but such spaces will have some form of value to the community particularly for benefits to mental and physical health and wellbeing and help define what makes that specific settlement what it is.
- 5.2.23 The Neighbourhood Plan household survey included a question on Local Green Spaces and asked the community to identify spaces that would meet the criteria and should be protected because of their value to the local community. Over 21 different spaces were identified through the survey results.
- 5.2.24 The candidate spaces and some additional spaces identified by the Steering Group were assessed against the NPPF criteria. The result is the 23 spaces shown in figure 15 and listed within **Policy RWH9**. Assessments for each one against the criteria set out in the NPPF have been carried out and these are shown in **Appendix D**.

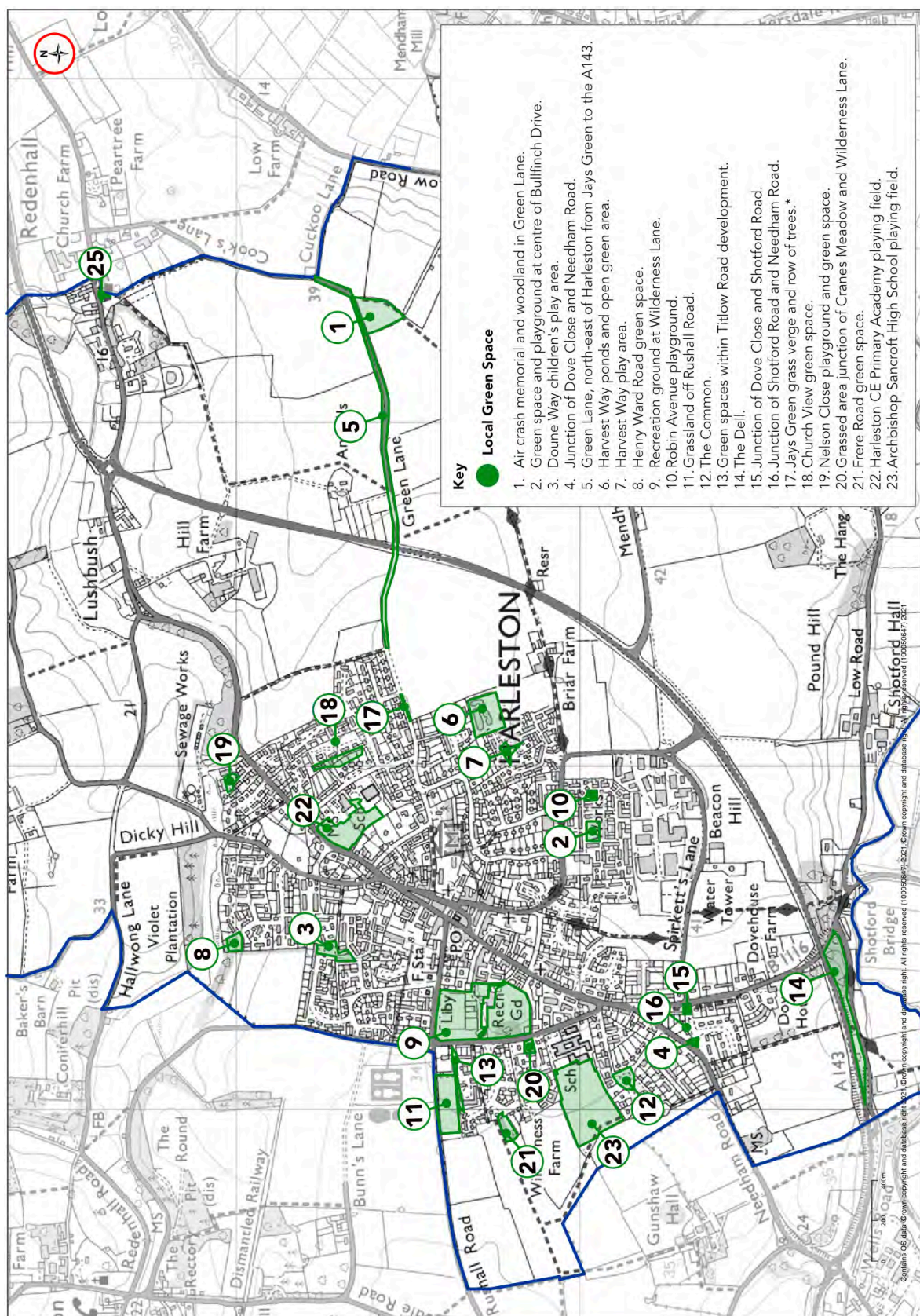


Figure 15: Local Green Spaces (source: Parish Online, with own annotations). Blue line denotes parish boundary. See Appendix D for detailed site maps.

RWH9: Local Green Spaces

The following areas are designated as Local Green Spaces for special protection (as shown on figure 15):

1. Air crash memorial and woodland in Green Lane.
2. Green space and playground at centre of Bullfinch Drive.
3. Doune Way children's play area.
4. Junction of Dove Close and Needham Road.
5. Green Lane, north-east of Harleston from Jays Green to the A143.*
6. Harvest Way ponds and open green area.
7. Harvest Way play area.
8. Henry Ward Road green space.
9. Recreation ground at Wilderness Lane.
10. Robin Avenue playground.
11. Grassland off Rushall Road.
12. The Common.
13. Green spaces within Titlow Road development.
14. The Dell.
15. Junction of Dove Close and Shotford Road.
16. Junction of Shotford Road and Needham Road.
17. Jays Green grass verge and row of trees.*
18. Church View green space.
19. Nelson Close playground and green space.
20. Grassed area junction of Cranes Meadow and Wilderness Lane.
21. Frere Road green space.
22. Harleston CE Primary Academy playing field.
23. Archbishop Sancroft High School playing field.

* Identification of these spaces as Local Green Spaces would not preclude pedestrian or cycle access across these routes. It is recognised, that pedestrian and cycle links need to be provided to allow access to the Briar Farm site which will cross the verge at Jays Green.

The playing fields identified in 22 and 23 are considered important for the well-being of the pupils. However, should the schools wish to expand or alter in the future, the change of use of playing fields for educational provision to enable this to occur would be supported providing the loss resulting from the proposed development would be replaced by equivalent or better provision of playing fields in terms of quantity and quality in a suitable location easily accessible to pupils.



5.3 Town centre, business and employment

Objective 4: To reinforce the important function of Harleston Town centre as a viable, successful, and attractive centre for residents and visitors.

Harleston town centre

- 5.3.1 The town centre of Harleston originally developed around the triangular area forming the extent of the historic market area, bounded by the Thoroughfare, Broad Street and Exchange Street. The width and alignment of the streets vary, with small alleyways and yards often tightly enclosed with converted commercial buildings.
- 5.3.2 There are different configurations for roads close to the core triangle. The two sides of the 'triangle' are different. London Road leading to The Thoroughfare is relatively straight, but the subtle curve as it approaches the Market Place creates interesting views. It is quite narrow, although the exact building line varies. To the east movement is through a succession of spaces with focal points at the narrowest ends, and broad building frontages at the widest ends. Broad Street widens out at its southern end and branches into Church Street to the west, and then Old Market Place to the east broadens out with buildings and the narrow Mendham Lane leading off in the Southeast corner. As mentioned in earlier sections most of the town centre is included within the Conservation Area designation with a high-quality streetscape and public realm.
- 5.3.3 The NPPF encourages planning policies and decisions to support the role that town centres play at the heart of local communities by taking a positive

approach to their growth, management and adaptation. Policies should allow town centres to diversify and grow in a way that can respond to rapid changes in retail and leisure industries and allow a suitable mix of uses including housing that reflects its distinctive character.

- 5.3.4 The Neighbourhood Plan household survey asked residents what they most valued about Harleston town. The results revealed that the town centre, particularly the number of independent and local shops, post office and the bank, were highly valued by local people together with the free parking and easy access. There were some concerns raised about traffic in the town centre, which is not unusual in historic market towns. The results of the business survey carried out in February 2021, revealed that Harleston Town Centre is largely a pleasant and popular place to do business.
- 5.3.5 During the COVID-19 pandemic, town centres and retail/leisure businesses have had difficult trading conditions to contend with. The demise of businesses in a town centre will be harmful to the appearance and economic fabric of the town. It is recognised that it is not possible to require a business to stay open or indeed to require that other businesses are represented in the town. To preserve the town centre and to retain the footfall required for independent shops there is a need to retain a diverse mix of shops to make people want to return to the town in the future. Independent shops rely on offering a specialist or niche product to attract customers. Encouraging new independent shops is a challenge but would retain the attractive character of the town. However, to ensure that the vitality and viability of the town centre is maintained and enhanced, town centre planning policies need to be flexible to enable businesses to thrive.
- 5.3.6 The NPPF defines the main town centre uses as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs etc.); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

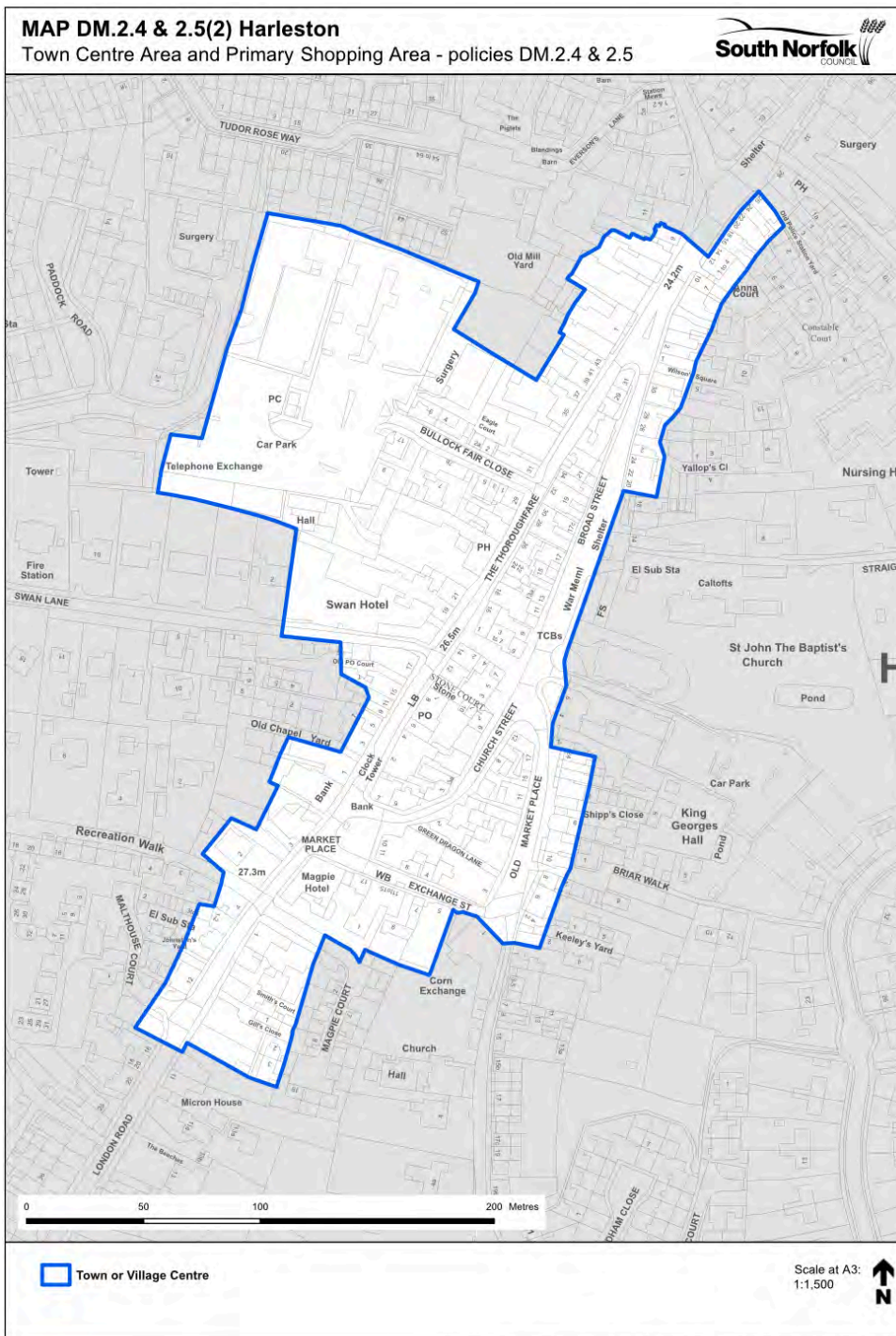


Figure 16: Map showing Town Centre Area (policies DM.2.4 & 2.5, South Norfolk Council). Source: South Norfolk Council, Development policies document maps 2015,¹⁸ with Primary Shopping Area removed.

¹⁸ <https://www.southnorfolkandbroadland.gov.uk/downloads/file/246/development-management-policies-document-maps>. Accessed 25.06.21.

RWH10: Town centre vitality and viability

In order to reinforce and underpin the important function of Harleston Town centre as a viable and attractive commercial centre, proposals for new retail, leisure, and town centre uses will be supported within the identified Town Centre Area as defined in the South Norfolk Development Management Policies Document 2015 (figure 16).

The retention of existing retail uses within the town centre will be supported. Proposals that would involve the change of use of an existing town centre building, to a non-town centre use (B2/B8) within the Town Centre Area will not be supported.¹⁹

Outside of the Town Centre Area, development proposals that involve the change of use from Employment Use Classes E(g), B2 and B8 into a retail or leisure use will not be supported.²⁰

Proposals for residential development at first floor level above existing retail uses e.g. 'Living over the Shop' will be supported.

Town centre enhancement

- 5.3.7 Another key element of the importance of a town centre, which goes beyond the retail offer, is ensuring that the town centre remains an attractive place for people to spend their time. Measures that make the physical environment more attractive and offer a range of spaces to enable people to sit, relax, interact will add to the attractiveness and vitality of the town. Town centre enhancements measures that would improve the overall safety for all users of the town centre and make it a more attractive area for pedestrians and cyclists, or users of public transport are all elements that can contribute to improving town centre attractiveness.
- 5.3.8 It is recognised that any future proposals for town centre enhancement should be the subject of full consultation with local residents by the appropriate authority.

¹⁹ Use Classes are defined as follows: B2 - General Industrial; B8 - Storage and Distribution

²⁰ Use Classes are defined as follows: E(g) Uses which can be carried out in a residential area without detriment to its amenity: E(g) (i) - Offices (administrative and operational); E(g) (ii) Research and development of products or processes; E(g) (iii) Industrial processes.

RWH11: Town centre enhancement

Development proposals that would result in the enhancement of the town centre including creating an attractive public realm, improving Harleston's aesthetic qualities and including the creation of spaces for local people to meet and socialise and for use by visitors to the town, will be supported.

Measures to improve the safety of pedestrians and cyclists will be supported.

Development proposals should be consistent with the principles laid out in the Redenhall with Harleston Design Guidance and Code.

Small scale retail

5.3.9 With the level of new housing growth proposed for the town in the emerging Local Plan up to 2038, it is likely that some new residential developments will be of a sufficient size that they may require some small-scale retail provision within the development, particularly those sites that are allocated in the emerging Local Plan. Alongside their principal shopping role, neighbourhood shopping 'parades' perform important social functions. Local shops can undertake several roles and it has been identified by the Association of Convenience Stores²¹ that these include social hubs, personalised service providers and community cohesion as essential characteristics of neighbourhood provision. They would also minimise the need for residents to travel into the town centre for small purchases.

5.3.10 Where small-scale retail provision to meet day to day needs is proposed as a consequence of new development it will be supported in principle. Such retail would need to be well located within the site, easily accessible by pedestrians and with suitable provision for all users and visitors including car and cycle parking.

²¹ T Hastings (2011) 'Re-asserting a sense of place: the community role of small shops' on behalf of the Association of Convenience Stores.

RWH12: Small scale, day-to-day retail in new developments

Where major new housing development is proposed, the inclusion of provision for small scale new retail including convenience shops, that would meet the day-to-day needs of residents in those new development areas will be supported. Such provision should be of a scale proportionate with the size of the development proposed and should be located to be easily accessible from all areas of the development by pedestrians and cyclists.

Objective 5: To support new employment opportunities and encourage existing underused or unused employment sites to move forward.

Employment sites

5.3.11 The NPPF states that planning policies and decisions should help create the conditions in which businesses can expand and invest and adapt. Weight should be given to the need to support economic growth and productivity taking into account local business needs. In rural areas planning policies should enable the sustainable growth of all types of business both through the conversion of existing buildings and well-designed new buildings. The use of previously developed land and sites that are well related physically to existing settlement should be encouraged.

5.3.12 The Adopted Joint Core Strategy identified specific sites for employment or mixed-use development. These are:

- HAR5 – mixed-use including employment uses, retail including a food store at Station Hill.
- HAR6 – employment uses B1 and B2 – offices, industrial use north of Spirketts Lane.
- HAR7 – employment uses B1, B2 and B8 – offices, industrial use and storage and distribution south of Spirketts Lane.

5.3.13 The emerging Greater Norwich Local Plan, has allocated employment on a further site:

- GNLP2136 – mixed use development including 0.8ha of retail or employment land

5.3.14 The emerging GNLP seeks to roll these allocations forward and does not make further employment provision for the plan period up to 2038. The

Neighbourhood Plan also does not propose to make any additional allocations for employment or business uses but where proposals for such uses as identified above come forward, they would be directed to those existing allocations insofar as room is available.

POLICY

RWH13: Existing employment sites

Proposals for new employment development Use Classes B2, B8 and E(g) will be expected to conform with the employment allocations identified in the Adopted Local Plan.

The expansion of existing businesses including small scale extensions will be supported provided they do not have a significant adverse impact upon the character of the area, adjoining uses, or the amenity of local residents, either through their built form, proposed use or traffic generated.

Live-work units

5.3.15 Whilst the immediate effects of the COVID-19 pandemic will be felt during the early part of the Neighbourhood Plan period, it is clear that the needs and desires of both employers and employees are changing. With the large scale 'working from home' brought about by the pandemic, employers are reassessing their accommodation needs and it may be that the demand for smaller business units and office space becomes more prominent. In addition, the boom in online shopping through the pandemic has increased the prominence of storage and distribution for online retailers including warehousing developments.

5.3.16 In addition, employees who may be working part or fulltime from home for some time to come have been assessing whether their current residential accommodation is satisfactory for home working and there is potential demand for more bespoke live-work units to satisfy creative or small-scale manufacturing businesses. Live-work space is defined as 'flexible units that accommodate both functions'²².

²² Robert Cowan (2005), 'The Dictionary of Urbanism'.

RWH14: New live-work units

Proposals for appropriately located live-work units will be supported provided they are of a size and scale appropriate to the character of the area; they have good accessibility to the town centre particularly pedestrian and cycle links, and they would not adversely affect the amenity of adjoining users. Proposals should include the provision of sufficient car parking, consistent with the adopted Norfolk County Council parking standards, to accommodate the use proposed, so as not to create new or additional parking problems, especially in the town centre.



5.4 Access

Objective 6: To ensure new developments provide transport connections both to the town and to the wider countryside and to encourage safe and healthy access for pedestrians and cyclists within new development.

- 5.4.1 Harleston's strategic links are provided by the A143. This primary road used to run through the centre of the town until the by-pass in 1981. There is no longer rail service. Harleston initially developed around a triangular area, which is likely to have defined the extent of the historic market area. The emphasis of the town, even following various highway improvements, is still north-south. Off the main north-south axis of principal thoroughfares there are a number of small alleyways and yards often tightly enclosed with converted commercial buildings, although in some cases these now also provide useful pedestrian access to newer development. There are different configurations for roads close to the core triangle. London Road is relatively linear and quiet narrow, but it meanders as it approaches the Market Place providing evolving views. Broad Street widens out at its southern end and branches into Church Street to the west. Old Market Place to the east broadens out with buildings and leads into the narrow Mendham Lane to the south-east.
- 5.4.2 Public transport, particularly bus transport is viewed by local residents as poor with a relatively poor choice of routes and times. There are three local bus services which serve Redenhall with Harleston Parish. Service 581 travels to Beccles from Diss via Harleston. Service 84 runs to Norwich via Hempnall and Service 38A travels from Harleston to Norwich via Long Stratton. Accessibility within the town itself for pedestrians and cyclists is generally viewed more positively with a number of pleasant and direct routes around the town and between housing areas and the town centre.

- 5.4.3 As with many market towns, Harleston does have its share of traffic issues. Congestion in the town centre can occur at peak times and when HGVs are delivering to town centre businesses. The historic core of the town can become difficult to navigate which is not unusual for an historic town whose original street pattern was designed to accommodate considerably less and substantially different traffic levels and transport modes. Some pavements cannot accommodate the requirements of mobility guidelines.
- 5.4.4 Whilst concerns over traffic congestion, speeding and unregulated parking are often issue of concern to local communities, the planning process and Neighbourhood Plans more specifically are limited in the ability to address many transport issues as their policies are only enacted where development occurs. Neighbourhood Plan policies therefore cannot address issues such as speeding, congestion or nuisance parking where these are already existing problems but may be able to influence such issues in the future and ensure that new development does not exacerbate existing problems or cause new ones.
- 5.4.5 Government guidance in respect of plan making and transport issues tends to focus on promoting sustainable transport. Plans are urged to consider at an early stage the impacts of development on transport networks, realise opportunities for improvement, promote walking and cycling and public transport use and ensure that any adverse impacts of traffic are mitigated. It is also acknowledged that the pattern of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 5.4.6 The government advises that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, which can help to reduce congestions and emissions and improve air quality and public health.

RWH15: Traffic generation and safety

Proposals should maximise opportunities for sustainable transport, including walking and cycling, to the town centre, prioritising these modes as far as possible.

Within proposals for major development, consideration should be given both to the levels of traffic generated by the proposal and the wider impacts of this traffic. Measures should be included to address and mitigate potential impacts upon highway and pedestrian safety as well as those on traffic flows elsewhere in the town.

Development impacts that cannot be mitigated and which would result in an unacceptable increase in traffic generation, or which would be detrimental to highway safety will not be supported.

Walking and cycling

- 5.4.7 Government guidance encourages development proposals to provide for high quality walking and cycling networks and supporting facilities such as cycle parking. Such networks should be comprehensive and provide not only for recreational routes but also for meaningful routes that can realistically be used for commuting to work or school. In addition, new routes should connect to the existing network and be suitable for use by people with disabilities and reduced mobility. New cycling and pedestrian routes should be safe, secure, and attractive, minimise the scope for pedestrians and cyclists and respond to the character of the area and any relevant design standards.

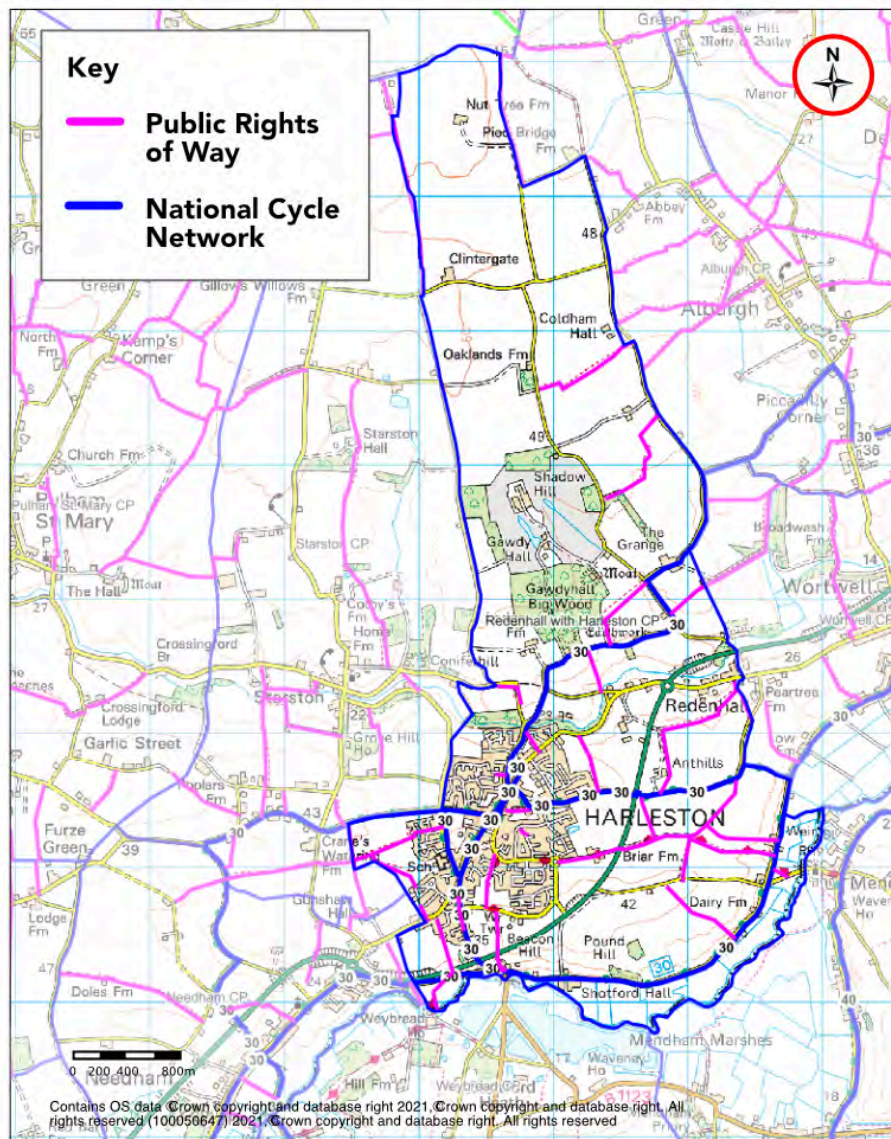


Figure 17: Public Rights of Way and the National Cycle Network (source: Parish Online, with own annotations). Blue line denotes parish boundary.

RWH16: Pedestrian and cycle connectivity

All new developments should contribute to the health and wellbeing of residents by increasing levels of walking and cycling through the provision of safe and attractive pedestrian and cycle routes and crossings within the site, that are suitable for all users, including those with wheelchairs/mobility scooters and buggies.

Large scale new developments should contain more than one point of access for pedestrians and cyclists and improve community cohesion and integration by providing good connections to the town centre, the rest of the town and to new and existing services.

New routes should form a cohesive network for users and allow for access both within the town but also to the wider countryside, where opportunities should be taken to maintain and connect to existing green corridors in order to provide interconnecting pathways for circular walks where possible.

Development proposals should be consistent with the principles laid out in the Redenhall with Harleston Design Guidance and Code.

Public Rights of Way

- 5.4.8 The Neighbourhood Plan household survey revealed that Redenhall with Harleston residents attached considerable value to public footpaths and cycle routes. The most popular were the routes that provided access into the countryside and routes within the Waveney valley were highly valued.
- 5.4.9 The NPPF advises that planning policies and decisions should protect and enhance Public Rights of Way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. Opportunities to improve facilities for walkers and cyclists in the parish would be supported. Proposals that are likely to require the re-routing of Public Rights of Way should be discussed with Norfolk County Council at an early stage
- 5.4.10 The NPPF also advises that new development layouts should be designed to allow for easy pedestrian and cycle connections within and between neighbourhoods, and also into the wider countryside.

- 5.4.11 The parish is relatively well served by footpath including The Angles Way, a promoted long-distance trail between Thetford and Great Yarmouth, which lies across the southeast of the parish.

POLICY

RWH17: Protection and enhancement of existing Public Rights of Way

Where development proposals are likely to affect an existing Public Right of Way, these should take account of its route and incorporate it into the overall layout of the scheme. Where this is not considered possible, this will need to be justified. Where Public Rights of Way may be unavoidably impacted or lost, appropriate diversions or new routes should be provided that are safe, equally accessible, and convenient for users.

Existing Public Rights of Way which are incorporated into new developments, including bridleways and footpaths, should be protected and enhanced. Enhancement can take the form of new routes, connections, improved surfaces and/or signage increasing access to the countryside and connectivity between communities.

Parking

- 5.4.12 Government guidance recognises that there continues to be a demand for parking in both residential and non-residential developments. The NPPF makes it clear that parking standards for residential and non-residential development should only be set where there are clear and compelling reasons for doing so that are necessary to manage the local road network. Parking provision for developments in South Norfolk will be made in order to satisfy the relevant adopted standards of South Norfolk Council as local planning authority.
- 5.4.13 Adequate and well-maintained parking provision is an important element of new development, whether it is for a single dwelling or for a major housing scheme or business premises. The Neighbourhood Plan encourages sustainable transport options; however, it is also a reality that private cars will be used to access services and employment either within or beyond the town.
- 5.4.14 Allocated parking on new residential estate should discourage indiscriminate and on-kerb parking. As demand for electric vehicles is expected to increase over the plan period, opportunities should be taken to encourage the installation of electric charging points both in residential and non-residential developments.

5.4.15 In larger housing developments, unless parking provision is well designed it can either dominate or detract from the overall visual appearance of that development. Where parking is to be provided it should be an integral part of the design and layout and it should also be designed to meet the needs of residents it is intended to serve.

POLICY

RWH18: Parking

Parking provision (including cycle parking and motorcycles) for all new development must be in accordance with the adopted parking standards of Norfolk County Council, take account of the guidance contained in the Manual for Streets, and conform to the principles set out in the Redenhall with Harleston Design Guidance and Code.

Residential parking

Parking in new housing developments should be located to be discreet, accessible, and appropriate to the character of the proposed development.

Taking into account the proposal and its location, individual parking provision should include adequate off-street parking for the size of the dwelling and take account of the number of bedrooms proposed for that dwelling.

Communal parking areas should be well located so as not be too disconnected from the dwelling, promote natural surveillance, security, and include for provision for electric car charging.

Non-residential parking

Non-residential development including commercial, retail and leisure development should provide adequate parking for the intended users of that development, including staff and customers, to avoid creating parking problems such as parking on pavements and green verges.



5.5 Natural environment

Objective 7: To protect and enhance the landscape setting of the town and the important natural assets of the surrounding rural parish, now and in the future.

Landscape

5.5.1 Redenhall with Harleston sits within two landscape character types. These are Character Area A5 Waveney Rural River Valleys Landscape Character type and Character Area B4 Waveney Tributary Farmland as set out in the South Norfolk Landscape Character Assessment, reviewed in 2012. The first area is so named due to its proximity and relationship with the broad, flat valley of the River Waveney, whilst the northern part of the parish is identified as the Waveney Tributary Farmland.

5.5.2 The key characteristics of the Rural River Valleys landscape character type are:

- Wide, flat, valley floodplains.
- Long views within the valley, but restricted views looking out.
- Willow pollards and lines of poplars, reeds and marshes.
- River crossings such as fords and old bridges.
- Grazing in the flood plain (usually cattle).
- Round towered churches and mills.
- Scattered farmsteads and few 'market towns'.
- Materials such as red brick and features such as Dutch gables.
- Wetland and heathland habitats with wet pasture.²³

²³ South Norfolk Landscape Character Assessment, <https://www.southnorfolkandbroadland.gov.uk/downloads/download/308/south-norfolk-landscape-character-assessments>. Accessed 25.06.21.

5.5.3 The key characteristics of the Waveney Tributary Farmland Landscape

Character Type are:

- A large-scale open landscape on the higher ground with some distant views. Pockets of enclosure and intimacy associated with the tributaries.
- Narrow streams, drainage channels (within grass verges) ponds and moats are characteristic. Ditches occur along roadsides and in places divide fields.
- Predominantly arable farmland with a varied field pattern. Fields are small to the south of the character area, larger on the higher plateau areas.
- Mature hedgerow trees are very distinctive especially large mature oaks.
- Hawthorn/ blackthorn hedges divide fields.
- Scattered blocks of woodland with some larger blocks having SSSI designations.
- Pockets of parkland and remnant parkland occur.
- Diversity of ecological assemblages including grassland, wet habitats, woodland, some of which are SSSI.
- A peaceful and rural landscape.

5.5.4 The Rural River Valleys Landscape Character Type covers 9.8 per cent of South Norfolk's land area at 8,937 hectares. The River Valleys throughout Norfolk have been identified as important landscape areas due to their landscape character and quality since the 1998 Norfolk Structure Plan and policies reflecting this have been included in the various iterations of South Norfolk Local Plans since that time. Policies have required that new development should respect, conserve and, where possible, enhance the landscape character of its immediate and wider environment. Additionally, development has not been permitted where it would significantly harm the identified landscape character of an area.

5.5.5 The integrated 'landscape character area' based policy approach is in line with current practice throughout Norfolk and elsewhere in England. These areas have been identified successfully by examined policies which have designated them as 'important landscape areas' on the basis of the high number and significance of the 'landscape assets' they contain and their overall contribution to providing variety within the South Norfolk context'. These can be summarised as follows:

- Very distinctive character and strong sense of place.
- Large number of important/rare features, including landmark features such as windmills, round towered churches and mills, as well as diverse habitats of wetland, woodland and heathland.
- Grazed, pastoral valleys floors contrast strongly with the arable

dominated farmland of the majority of the district.

- Largely intact rural character, which in places is highly tranquil and undisturbed.
- Intimate and enclosed landscape with an overall small-scale character.

5.5.6 This Neighbourhood Plan recognises the intrinsic value and special qualities of this area of landscape and proposes to ensure that distinctive features of the Rural River Valleys and Waveney Tributary Farmland Landscape Character types are protected.

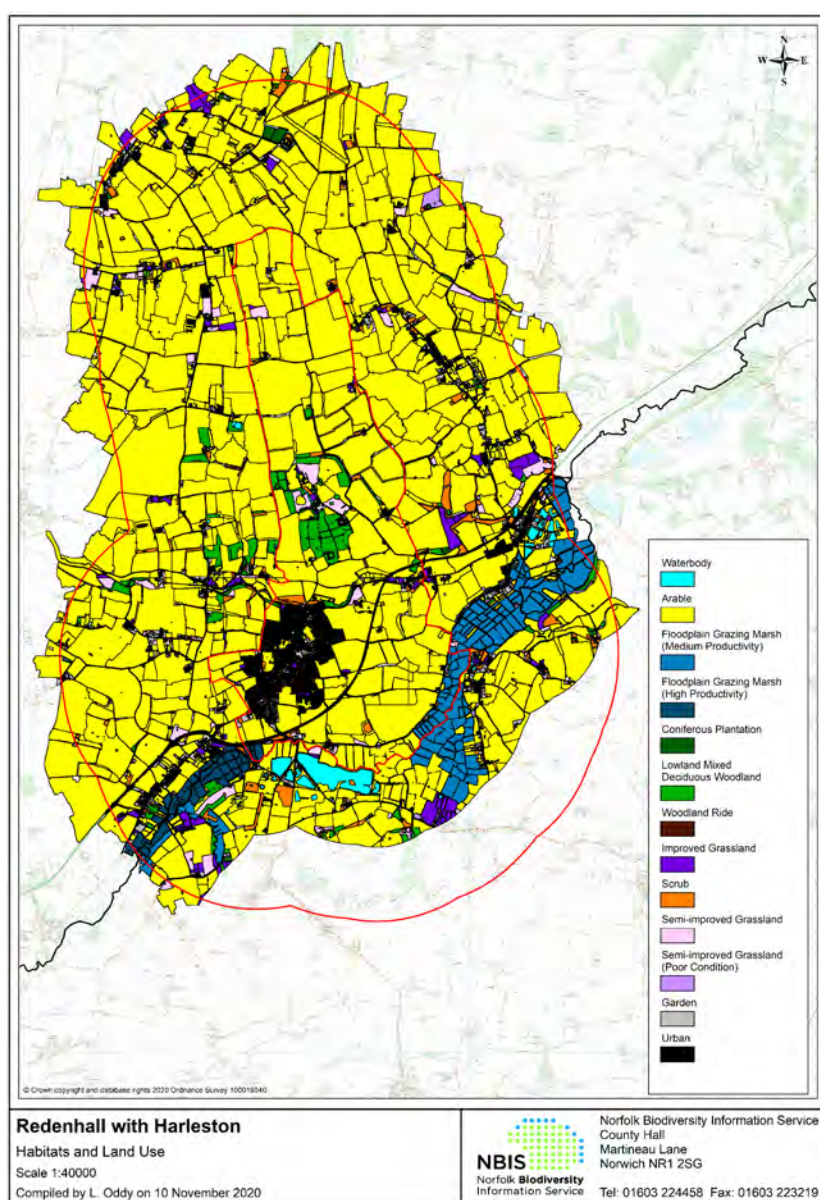


Figure 18: Habitats and land use (source: Norfolk Biodiversity Information Service).

5.5.7 The transition between rural landscape character and the urban form of the edge of the town is important not only for its landscape value appearance but because of the visual gateway it provides to the appearance of the edge

of the town. Six important entrances have been identified through consultation, that provide important 'green gateways' to the town due to the soft edge they provide between urban area and the surrounding rural landscape character. The undeveloped approach to the town from the neighbouring parish of Starston, is identified within the Starston Neighbourhood Plan as a 'strategic gap'. The maintenance of soft entrances to Town gateways 1 and 2 identified in Figure 19 and listed in RWH19, and of the important public view identified as 13 in Figure 20 and in RWH20, are consistent with the maintenance of this 'strategic gap'. The Starston Neighbourhood Plan can be found at: www.starstonvillage.co.uk/starston/neighbourhood-plan

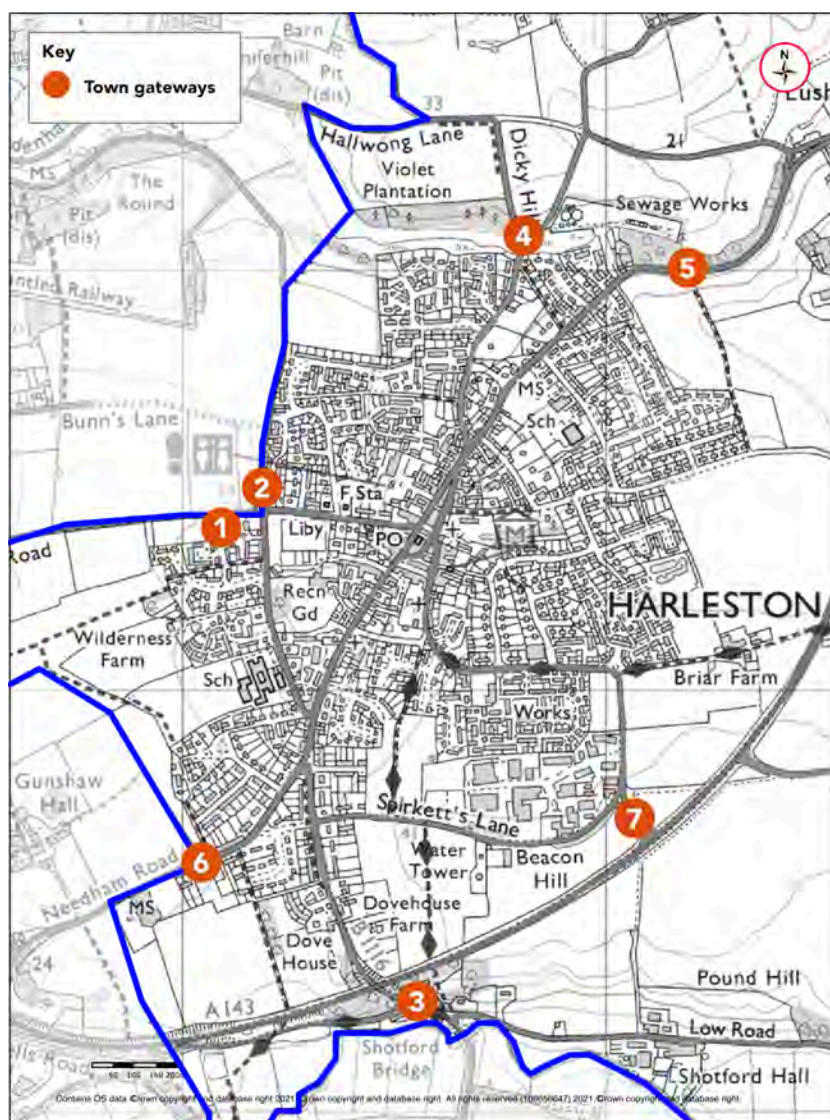


Figure 19: Town gateways (source: Parish Online, with own annotations). Blue line denotes parish boundary.

RWH19: Landscape character and town gateways**Landscape**

The visual scenic value of the landscape and countryside in the Neighbourhood Plan Area outside the defined settlement boundary will be protected from development that may adversely affect this character.

Where a development would include any parts of the neighbourhood area that have sensitive features typical of the Rural River Valleys and the Waveney Tributary Farmland Character Areas, such as long tree belts, mature hedges, mature oaks, ponds, moats, wet meadow, wet pasture and heathland, these should be incorporated into the design and layout of development proposals such that the locally characteristic patterns can be retained within new land uses.

Town gateways

Proposals that would enhance the visual appearance of a natural asset in the parish or an entrance or 'gateway' to the town will be supported, however where 'green' gateways or substantially undeveloped entrances currently exist, these should be maintained as 'soft' entrances to assist with rural to urban transition. The following areas are identified as an important 'soft' gateway to be maintained (figure 19):

1. From Rushall Road joining up with the junction at Wilderness Lane.
2. From The Street, Starston to its junction with Rushall Road, Wilderness Lane and Swan Lane.
3. The approach from Weybread to the south, from Shotford Bridge up Shotford Hill.
4. The approach from the north leading to Station Hill.
5. The eastern approach to the town from Redenhall roundabout.
6. The approach from Needham Roundabout past The Cherry Tree.
7. The approach from A143 into Mendham Lane.

Where gateway enhancements are proposed, schemes should be designed to ensure that gateway enhancements do not detract from highway safety and visual amenity and should minimise the need for additional lighting.

Opportunities to improve the public realm at entrances to the town, through the use of appropriate hard or soft landscaping measures will also be supported where they include the use of vernacular materials and native planting.

Important public views

5.5.8 Opinions were sought on important views and vistas into and out of the town through a specific question in the Neighbourhood Plan household survey. Unsurprisingly views into or across the Waveney valley were very popular with respondents into and out of the town. These have been mapped and are shown on figure 20 below.

5.5.9 The Town Council were mindful that any policy which sought to protect these views should focus on those that are 'important' to the overall landscape character of the parish and which can be enjoyed from publicly accessible locations, e.g., footpaths, public highway, or an existing open space. Many of the vistas offer an immediate contrast, separation and sense of freedom from the pressures of the world within very short distances from home. These locations offer easy access to countryside experiences, especially for people with limited mobility, with the associated benefits to health and well-being from engaging with the natural world and countryside.

5.5.10 Harleston, lying in a distinct local meteorological area, has particularly exceptional skies, by both day and night, an essential component of the many local vistas. Relatively low light pollution in its surroundings means that star-filled skies, rare over much of England, can be readily enjoyed. Ensuring light pollution is avoided and limited throughout the parish is an important consideration.

5.5.11 Taking all of this into account, the following views have been identified as 'important public views' in **Policy RWH20** below:

1. View from the top of Dicky Hill from the linking footway looking east along Hallwong Lane: This view from a vantage point at the top of Dicky Hill looks along a footway heading east along Hallwong Lane, towards the Beck. It is surrounded by a vista of green fields, trees and hedges providing a peaceful rural view accessible from the northern section of Harleston

2. View from footpath 7 to the south of Gawdy Wood, towards Redenhall: This view forms part of a longer walk from the town. The view, opening up for the walker reaching the top of the hill, is to the south over the valley of The Beck and the hamlet of Lushbush.

3. View from Grange Farm towards St Mary's Church, Redenhall: This view looking south provides a high vantage point across farmland towards the focal point of St Mary's Church, Redenhall

4. **View from Greenlands Barn towards Grange Farm:** This view looks across the Gawdy Hall Estate and woodland, providing an unspoilt rural vista

5. **View from beside the A143 near the Redenhall roundabout towards St Mary's Church, Redenhall:** A point some 200 metres east of the Redenhall roundabout provides an advantageous viewpoint across the Beck which features the silhouette of St Mary's Church, Redenhall.

6. **View from the top of the footpath joining Jays Green and Redenhall Road, towards Lushbush:** This is the first point accessible to walkers on the eastern side of the town which affords a wide rural view, looking north towards the Gawdy Hall Estate and Lushbush.

7. **View from Green Lane, east of the A143, near Anthills looking north towards the Gawdy Hall Estate:** This is a wide vista, embracing distant views of St Mary's Church and the skyline. It is close to the town, giving walkers who wish to walk further afield a peaceful stretch of traffic-free roadway which provides them with the opportunity to fully appreciate Harleston's rural setting.

8. **Views from the top of Cuckoo Lane/Green Lane, there is a panoramic view encompassing the Waveney Valley, Wortwell Marshes, and St. Mary's Church, Redenhall.** It is a particularly important location, being relatively free of light pollution, and one from which excellent views of the night sky and stars can be enjoyed.

9. **View from the Angles Way towards Mendham Mill:** This view looks across the Waveney Valley, above the marshes adjacent to the River Waveney, from the Angles Way where it descends towards the valley floor, towards Mendham Mill.

10. **View from Mendham Bridge northwards across the marshes towards the valley ridge:** The view is of undulating landscapes, wooded in places, and an unspoilt rural skyline by day and night. This was the location of an observation post during WWII.

11. **View from near The Hang towards the River Waveney:** This is representative of views of the river which extend along the length of Low Road across the grazing marshes of the River Waveney floodplain. These marshes and the view across their length offer important opportunities to appreciate the significant bird populations associated with them.

12. View from footpath 33, from Needham Road looking to the south west to the A143 crossing, towards the Waveney Valley: This view gives an easily accessible rural experience for residents in the south west of the town. Where the path descends steeply down to and across the A143 Harleston bypass, there is a narrow view to the Ocean Pit in the vicinity of Shotford Bridge and the floodplain of the River Waveney lie below.

13. View from footpath 28, from The Common to Rushall Road, looking north towards Starston: The viewpoint is easily reached from the western part of the town via a footpath and offers accessible and extremely popular long views of Harleston's western and northern landscapes, and exceptional view of Harleston's spectacular skylines

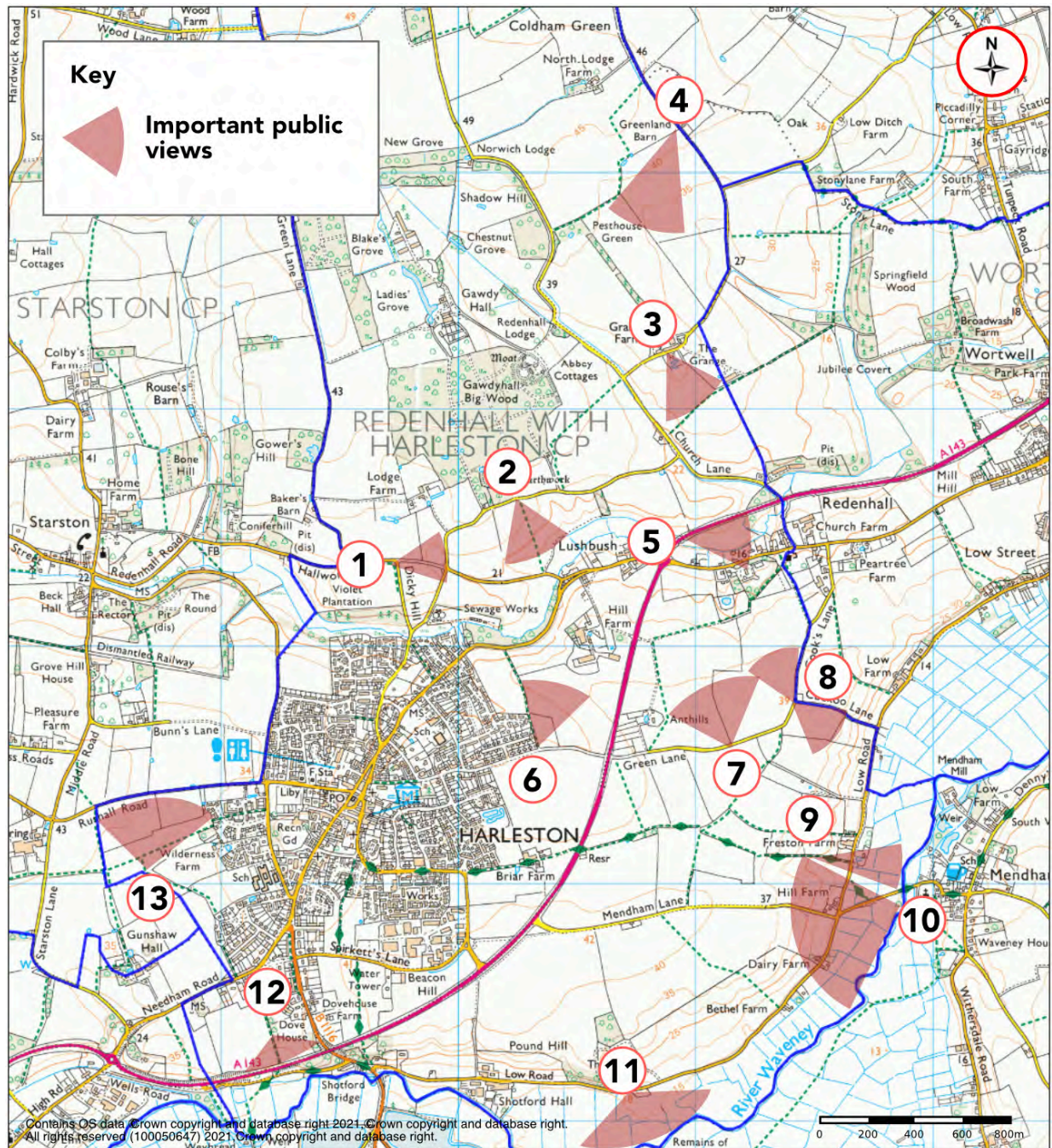


Figure 20: Important public views (source: Parish Online, with own annotations). Blue line denotes parish boundary.

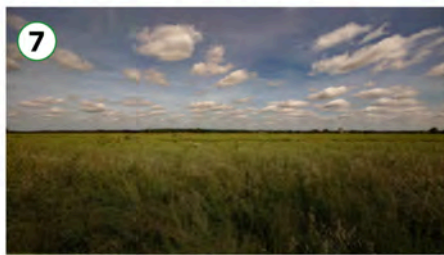
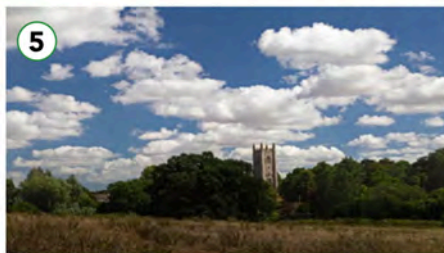


Figure 21: Important public views (source: Ian Carstairs).

RWH20: Important public views

The following views and vistas as shown in figures 20 and 21 are identified as important public local views. Development proposals within or which would affect an important public local view should take account of the view concerned. Developments, which would have an unacceptable adverse impact on the landscape or character of the view concerned, will not be supported.

1. View from the top of Dicky Hill from the linking footway looking east along Hallwong Lane.
2. View from footpath 7 to the south of Gawdy Wood, towards Redenhall.
3. View from Grange Farm towards St. Mary's Church, Redenhall.
4. View from Greenlands Barn towards Grange Farm.
5. View from beside A143 near the Redenhall roundabout towards St. Mary's Church, Redenhall.
6. View from the top of the footpath joining Jays Green and Redenhall Road, towards Lushbush.
7. View from Green Lane, east of A143, near Anthills towards the Gawdy Hall Estate.
8. Views from the top of Cuckoo Lane/Green Lane, a panoramic view encompassing the Waveney Valley, Wortwell Marshes, and St. Mary's Church, Redenhall.
9. View from the Angles Way towards Mendham Mill.
10. View from Mendham Bridge across the marshes towards the valley ridge.
11. View from near The Hang towards the River Waveney.
12. View from footpath 33, from Needham Road to the A143 crossing, towards the Waveney Valley.
13. View from footpath 28, from The Common to Rushall Road, towards Starston.

Wildlife and habitats

5.5.12 In terms of nature conservation sites, the parish contains a number of nationally designated nature conservation sites. These include Gawdy Hall Big Wood, Harleston Site of Special Scientific Interest which is located to the north of Harleston town. This site consists of a large area of ancient woodland on

poorly-drained chalky boulder clays, typical of South Norfolk.²⁴ A SSSI is a formal national conservation designation.

5.5.13 There are three County Wildlife sites in Redenhall with Harleston parish, which are non-statutory designations but recognise the high value of a site for wildlife. These are:

- **CWS 79 Blake's and Ladies Grove** – this site consists of two areas of broad-leaved woodland along the western edge with a large area of parkland on the east side.
- **CWS 80 Shadow Hill and Chestnut Grove** – this site is largely an area of old parkland but contains small fragments of possible ancient woodland.
- **CWS 81 Gawdy Hall Wood (part)** – this is a small area of woodland which contains an ancient moat, earthbanks and two ponds. It stands immediately to the south of Gawdy Hall Big Wood SSSI and is separated from it by a dry ditch.

²⁴ Gawdyhall Big Wood Harleston Citation, Natural England www.naturalengland.org.uk. Accessed 13.11.2020.

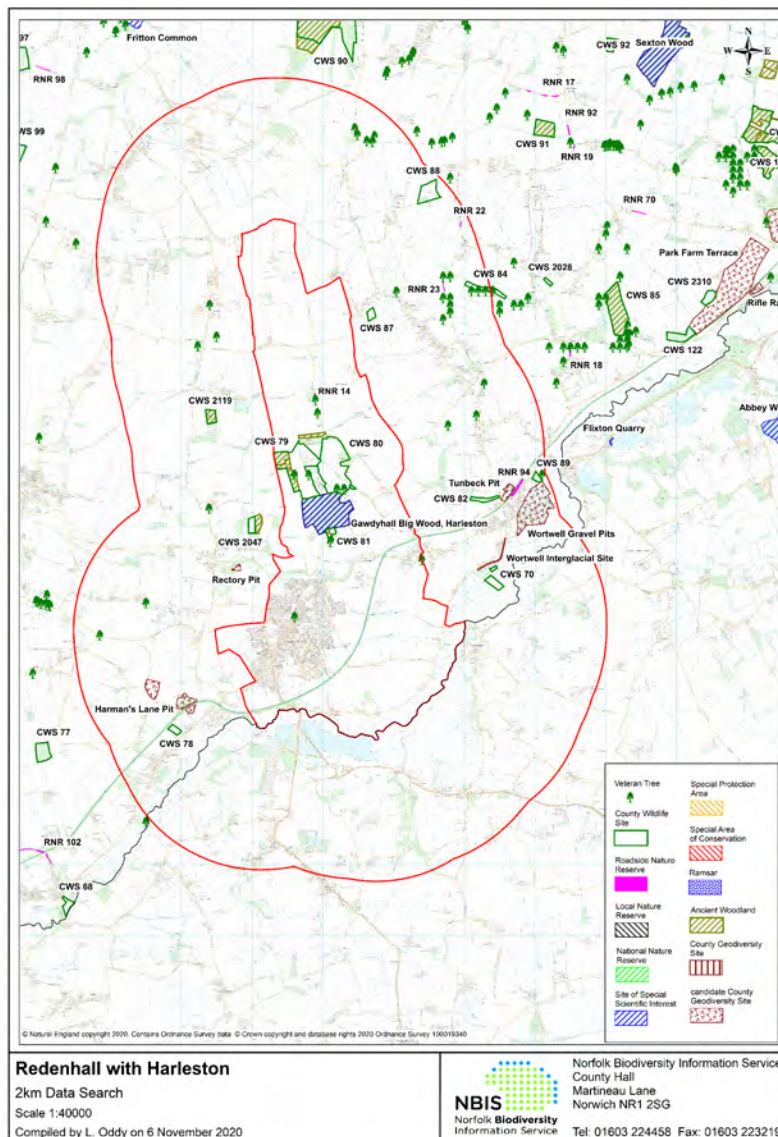


Figure 22: Natural habitats.
Source: Norfolk Biodiversity Information Service.

5.5.14 Nationally designated sites are protected through national planning policy in the NPPF and also in specific legislation. However, there is often less protection for locally designated sites or non-designated local sites which have a wildlife value. **Policy RWH21** below seeks to protect locally designated sites such as County Wildlife Sites from development that would damage their wildlife value.

5.5.15 There are a number of veteran trees and areas of ancient woodland in the parish. A veteran tree is one that is of interest biologically, aesthetically or culturally because of its age, or a tree in the ancient stage of its life or trees that are old relative to others of the same species. Ancient woodland takes

hundreds of years to establish and is defined as an irreplaceable habitat.²⁵ The policy also seeks to protect veteran trees.

5.5.16 Parts of Redenhall with Harleston parish are in SSSI Impact Risk Zones for Gawdy Hall Big Wood Harleston SSSI, Pulham Market Big Wood SSSI, Fritton Common SSSI, Metfield Meadow SSSI and Flixton Quarry SSSI. The Impact Risk Zones (IRZs) are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks to SSSIs posed by development proposals. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.²⁶ Planning applications in these areas need to be assessed for the likely impact on the SSSIs.

5.5.17 The policy also refers to 'wildlife corridors' which is a term used to refer to any linear feature in the landscape that can be used for the migration or dispersal of wildlife. Such corridors allow for the linking of habitats and reduce the isolation of populations. Linear features may vary and may also not be continuous however patches of natural habitat can benefit wildlife and occasionally the term 'steppingstones' is used to refer to them. The role of wildlife corridors is assuming greater importance and opportunities should be taken to create them as a consequence of new development.

²⁵ www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences retrieved. Accessed 13.11.2020.

²⁶ https://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf. Accessed 27.11.2020.

RWH21: Natural assets

Development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors. Proposals should retain existing features of biodiversity value, where possible to do so, (including ponds, trees (including veteran trees), woodland, hedgerows, and verges, as well as include new features such as Street Trees, new ponds and hedges).

Development proposals should conform to the principles set out in the Redenhall with Harleston Design Guidance and Code.

Development proposals will be supported where they provide a net gain in biodiversity through, for example:

- a. the creation of new natural habitats.
- b. the planting of additional trees and hedgerows and restoring and repairing fragmented biodiversity networks.
- c. repairing and connecting fragmented habitats to create new wildlife corridors.

Where loss or damage is unavoidable, the benefits of the development proposals must be demonstrated clearly to outweigh any impacts and the development shall provide for appropriate replacement planting or appropriate natural feature on site together with a method statement for the ongoing care and maintenance of that planting. Where development proposals cause damage to identified natural features or designated wildlife sites such as County Wildlife Sites, wildlife corridors around the interruption will be constructed.

New tree planting should be of a scale, location and type which adds value, and with a view to optimising benefits to wildlife. New and replacement planting should be of appropriate species and landscape maintenance and management plans should be agreed in writing with the Local Planning Authority. Planting plans should take account of the expected eventual size of the tree including future shading and the relationship with surrounding buildings. The design of gardens should take account of the contribution gardens can make to enhancing wildlife and include trees and hedgerows in boundary treatments, where appropriate. Tree species selection should take into account the warming climate.

Proposals for new buildings (including non-residential development) should incorporate measures to protect and enhance wildlife species including the

incorporation of wildlife friendly measures e.g., swift bricks, hedgehog doors and insect bricks etc, new garden hedgerows and trees.

Climate change and flood risk

5.5.18 The period for this Neighbourhood Plan looks ahead to 2038. When looking into the future it is difficult not to consider the issues of climate change and future sustainability taking account of flood risk. Government guidance encourages the planning system to support the transition to a low carbon future in a changing climate. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience, encourage the re-use of existing resources, including the conversion of existing buildings and support renewable and low carbon energy.

5.5.19 Unsurprisingly given the prominence of low carbon and the future sustainability of the planet in the media, the length of the plan period of the Neighbourhood Plan and the likelihood of significant technological improvements during that period, many neighbourhood plans include planning policies that seek to reduce green-house gas emissions by controlling the location, orientation and design of new development. Some also include policies to increase the supply and use of renewable low carbon energy and heat.

5.5.20 In March 2021, consultants AECOM were commissioned to produce a Design Code for Redenhall with Harleston. The report recommends technologies that could be incorporated in buildings and at broader Parish design scale as principles. Use of such principles and design tools should be encouraged in order to contribute towards a more sustainable environment. Energy efficient or eco design combines all around energy efficient appliances and lighting with commercially available renewable energy systems, such as solar electricity and/or solar/ water heating. Starting from the design stage there are strategies that can be incorporated to incorporate technologies such as passive solar heating, cooling and energy efficient landscaping which are determined by local climate and site conditions.

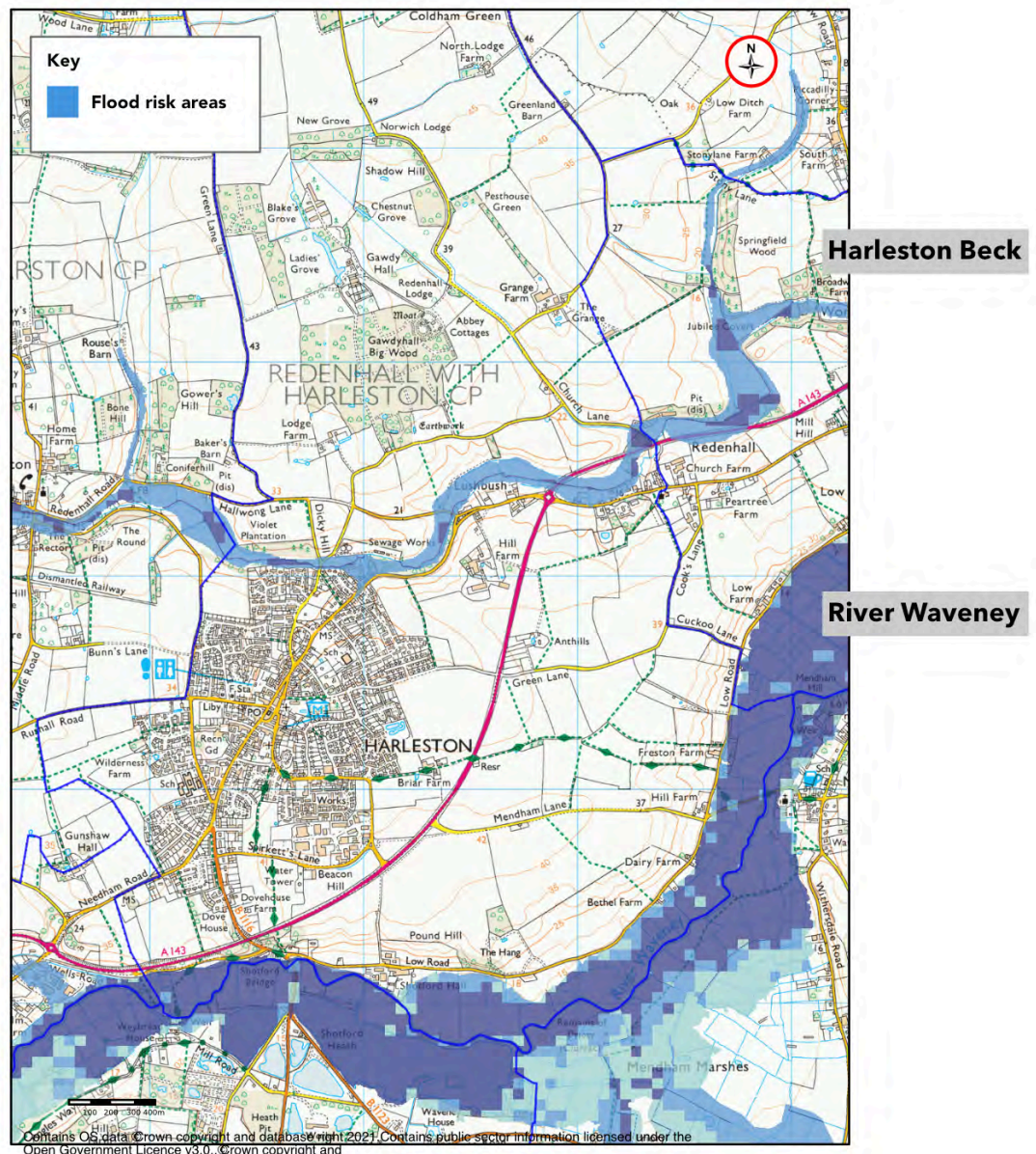
5.5.21 The following **Policy RWH22** has been devised in the light of the consultation responses, taking into account the increasing prominence of climate change and low carbon issues. It also has regard to the Written Ministerial Statement dated 25 March 2015 which makes it clear that it is not appropriate to refer to

any additional local technical standards or requirements relating to the construction or performance of new dwellings in neighbourhood plans.

Localised flooding

5.5.22 The two key pieces of blue infrastructure within the parish of Redenhall with Harleston are the River Waveney to the south and Harleston Beck to the north. The majority of the parish is largely located within Flood Zone 1 of the Environment Agency's Flood Risk categorisation which indicates it is at a low risk of flooding. There are however regular incidences of flooding within the town, including the town centre which are largely the result of surface water drainage issues rather than river-based flooding. These have been identified and are shown in figure 24.

Figure 23:
Flood risk
areas (source:
Parish Online,
with own
annotations).
Blue line
denotes parish
boundary.



5.5.23 These incidences of localised flooding are occurring more and more frequently as the climate and weather patterns change. It is therefore important to ensure that the occurrence of new development does not exacerbate existing flooding or drainage problems or lead to new ones either through surface water run off or displacement. Proposals for all new development should include appropriate drainage details that conform to the relevant standards of the Lead Local Flood Authority (LLFA).

5.5.24 The use of Sustainable Urban Drainage Systems (SUDs) is now commonly promoted by the County Council as Local Lead Flood Authority due to their benefits not only to flood relief but also in preventing pollution and their potential to benefit wildlife. **Policy RWH22** below has been constructed with this mind.

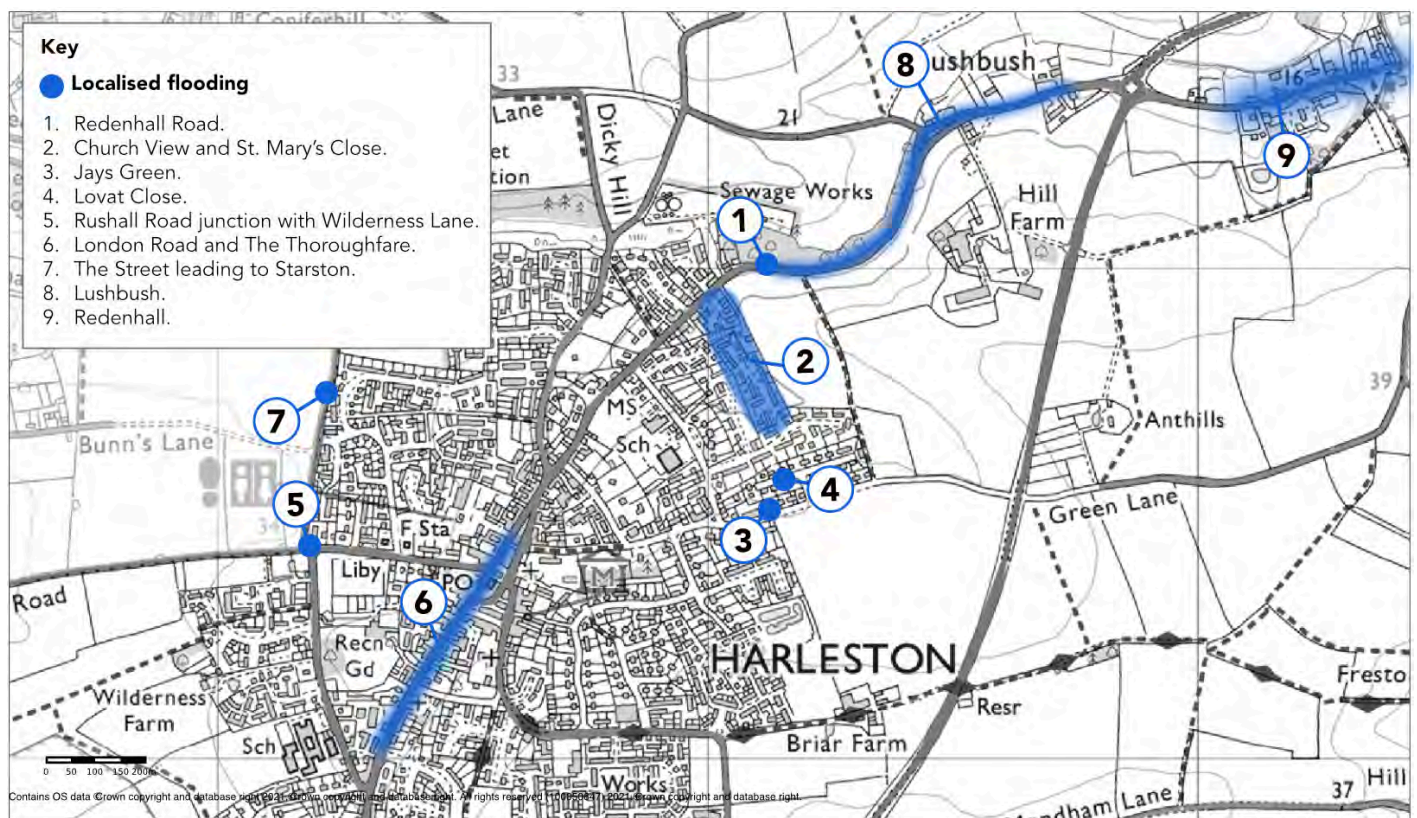


Figure 24: Localised flooding (source: Parish Online, with own annotations). Blue line denotes parish boundary.

RWH22: Climate change and flood risk**Climate change and sustainability**

Proposals are encouraged to include features in their design that would increase energy efficiency and reduce carbon emissions.

Development proposals should conform to the principles set out in the Redenhall with Harleston Design Guidance and Code.

Particular encouragement is given for the inclusion of the following features/mechanisms based on currently available technology:

- Electric charging points in both residential and non-residential developments and located adjacent to the primary parking space.
- Photovoltaic panels on all suitable roofs.
- Energy storage equipment.
- Building orientation to take account of local climatic conditions.
- Air/ground source heat pumps, where appropriate.
- Rainwater harvesting/capture.
- Grey water recycling.
- Passive solar gain.
- Low energy/down lighting (for safety and security).
- Passive ventilation.²⁷
- Thermal mass.²⁸
- On site energy generation, such as solar panels in both residential and non-residential developments.
- Movement activated street lighting.

Encouragement is also given to the incorporation of any future technological advances which would increase energy efficiency and reduce carbon emissions, which may have become available prior to new development.

In addition to the use of technology, encouragement is also given for tree planting schemes which can help to mitigate the impacts of climate change through carbon capture and reduce the risk of flooding through direct interception of rainfall, infiltration and slowing the flow of floodwaters.

Localised flooding

All new development (including minor development) is required to use appropriate sustainable drainage systems (including SuDS and drainage lagoons), wetland and water features, to protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits.

All development will be expected to demonstrate how it can mitigate its own flooding and drainage impacts, avoid increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates.

New development should not exacerbate existing surface water or foul drainage problems. The following are identified as areas of localised flooding (figure 24):

1. Redenhall Road.
2. Church View and St. Mary's Close.
3. Jays Green.
4. Lovat Close.
5. Rushall Road junction with Wilderness Lane.
6. London Road and The Thoroughfare.
7. The Street leading to Starston.
8. Lushbush
9. Redenhall.

Amenity and pollution

5.5.25 The NPPF requires that planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site and wider area to impacts that could arise from the development. Such effects can be in terms of noise and air pollution, dust and vibration issues.

5.5.26 The A143 forms part of the eastern boundary edge of the town and it is likely that future expansion of the town to the east will bring development closer to the A143. It is therefore important that the design of new development close to the A143 takes account of the potential impacts of this proximity to the road on the living conditions of future residents in terms of potential impacts from noise and air pollution in particular. The design of any development in this location should include a substantive landscape barrier which would perform a number of functions – the creation of a soft green edge to the town, a noise barrier, to act as mitigation against air pollution as well as providing informal recreational benefits such as dog walking.

27 Allowing fresh air into a building whilst removing stale air.

28 The ability of material to absorb and store heat energy.

RWH23: Landscaping buffers and pollution

Development proposals should conform to the principles set out in the Redenhall with Harleston Design Guidance and Code.

Proposals for new development should mitigate against pollution problems. This includes the pollution of existing water courses from surface water run off as well as air and noise pollution from increased traffic movements associated with new development, and light pollution.

Major developments close to the A143 should consider the potential noise and air pollution impacts from the A143 and reflect this in the layout of their schemes. They should contain substantial green buffers and tree planting between proposed residential developments and the A143 to allow for a soft edge to the development, provide recreational walks for residents and to provide mitigation against air and noise pollution from the A143, for those residents.



6. Implementation

Implementation

- 6.1 The Redenhall with Harleston Neighbourhood Plan has been developed to assist with the planning of sustainable growth across the town for a period up to 2038. The implementation of the Redenhall with Harleston Neighbourhood Plan will require the co-ordinated input and co-operation of relevant statutory and non-statutory agencies, private sector organisations and the local community.
- 6.2 The policies in this document shape the way in which development happens within the town of Harleston. Some policies included within the Redenhall with Harleston Neighbourhood Plan have a delivery element, often a requirement of development or 'planning obligation'. Planning obligations, (often referred to as section 106 agreements) are legal agreements negotiated between the Council and a developer or landowner (usually in the context of a planning application). Planning obligations are typically used to ensure that new developments:
- comply with planning policy - for instance, by requiring affordable housing or public open space to be provided; and
 - do not impose undue burdens on existing facilities - for instance, by requiring financial contributions to increase/improve local services such as schools, libraries or transport.
- 6.3 In order to see delivery realised, it will require the Town Council and partner organisations to be proactive in getting the best results for the town of Harleston. Working in partnership with South Norfolk Council and Norfolk County Council will be particularly important regarding strategic matters such as addressing traffic and highway safety issues for new developments.
- 6.4 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, to help deliver infrastructure to support the development of the area. South Norfolk Council has an adopted CIL Policy in place for the District and once the Neighbourhood Plan is 'made,' Harleston Town Council will benefit from 25% of the levy revenues arising from development that takes place in the parish. This revenue will be used to fund projects identified in the Neighbourhood Plan as well as other community priorities that may be identified during the plan period.

Monitoring

- 6.5 A formal review process in consultation with the local community and South Norfolk Council should be undertaken by the Town Council at a minimum of every five years, to ensure that the Neighbourhood Plan is still current and remains a positive planning tool to deliver sustainable growth. In order to determine when a review is necessary, the Town Council will monitor development in the parish along with local and national planning policy and the appropriate legislative context. It is anticipated the Redenhall with Harleston Neighbourhood Plan will require review during its life and that it will be the role of the Town Council to update the Neighbourhood Plan at the appropriate time.
- 6.6 Any review will provide an opportunity to reassess the town's housing and economic markets and to resolve some of the bigger issues surrounding development in and around the town.
- 6.7 The Town Council will report annually on the implementation of policies. This will be done at the Annual Town Meeting and the minutes will be available to view on the Town Council website.



Appendix

Appendix A: Steering Group Members

The Redenhall with Harleston Neighbourhood Plan Steering Group included the following members:

- **John Archer**, local resident
- **Trevor Graham**, Chair of the Town Council
- **Michael Hardy**, Town Councillor
- **Carolyn Malinowski**, Vice-chair of the Town Council and Chair of the Neighbourhood Plan Steering Group
- **Andrew Newby**, local resident and Vice-chair of the Neighbourhood Plan Steering Group
- **Matt Scade**, Town Councillor
- **Robin Twigge**, local business owner

There were also Steering Group contributions from **Clive Attwood**, **Peter Metcalf**, **Lizzy Pegg** and **Sara Whiting**.

Photos taken and supplied by Steering Group Members and **Ian Carstairs**, with thanks.

Supported by:

- **Clare Crane** – Town Clerk
- **Lynda Ling** – Former Town Clerk
- **Emma Harrison** – Independent consultant (data and environmental assessment) for the Neighbourhood Plan
- **Rachel Leggett** – Project Manager and independent consultant (consultation and layout) for the Neighbourhood Plan
- **Andrea Long** – Independent consultant (policy) for the Neighbourhood Plan

Appendix B: Potential community projects

- a. The expressed wish for more community indoor and outdoor space. The Town Council will examine this issue as further plans are made for development.
- b. The expressed wish for the parish to be defined as a Nature Recovery Zone. The Town Council will further investigate the potential for this project within wider environmental and planning work, working with a range of stakeholders and the local community.

Appendix C: Justification for Non-designated Heritage Assets

The table below outlined the justification for the inclusion of important character buildings and historic features. The criteria is based on the 'Local Heritage Listing: Historic England Advice Note 7', page 9.

1. Spigot mortar base	
On the Recreation Ground, which is owned by the Town Council	
Age	WWII, built in 1941.
Rarity	Fairly rare now.
Group value	NA.
Archaeological interest	A group of young aspiring archaeologists helped to take part in a dig at the site of a WWII weapon in Harleston in 2016. The Waveney Valley Community Archaeology group were excavating around the spigot mortar position which can be seen poking out of the earth at the recreation ground. The dig showed the concrete structure was found to have had a wooden fence around it.
Historic interest	WWII interest. Concrete base with a spigot that comes up which an anti-tank mortar gun fits onto. There were 2 in Harleston in case there was an invasion, to stop the advance of enemy or tanks.
Landmark status	Historical association with WWII.



Figure 25: Spigot mortar base and tank trap.

2. Pillbox, London Road

In the private garden of The Beeches, 13 London Road

Age	WWII, 1939-1945. A common 1940 type 22 pillbox is situated on the left-hand side of the drive to The Beeches, 13 London Road, and is partially demolished. The present owner is keen to preserve it.
Rarity	Fairly rare.
Architectural and artistic interest	NA
Group value	NA
Archaeological interest	NA
Historical interest	Historical from WWII.
Landmark status	NA



Figure 26: Pillbox, London Road.

3. Milestone built into the wall on Redenhall Road

Boundary of the property, formerly a coal yard

Age	19th Century milestone. Carved stone post by the B1134 (was A143), by number 23 in wall, on north-side of road. Erected by an unknown authority in the 19th Century.
Rarity	Very rare.
Architectural and artistic interest	NA
Group value	One of 12 surviving milestone along the Beccles to Scole Road.
Archaeological interest	NA
Historical interest	Marker for a route, Bungay 7 miles and Scole 8 miles.
Landmark status	NA



Figure 27: Milestone built into the wall on Redenhall Road.

4. Former Police Station and Jail on Redenhall Road

24 and 26 Redenhall Road, at the back of BUPA Dental Care building

Age	1892.
Rarity	Fairly rare.
Architectural and artistic interest	NA
Group value	NA
Archaeological interest	NA
Historical interest	Was a police headquarters which held a police station and lock up of two cells (now one remaining), brick built. Yard at the back was an exercise yard. Used to have adjoining stables for the police horses and traps.

Landmark status

NA



Figure 28: Former Police Station and Jail on Redenhall Road.

5. Five 3-storey Victorian properties

30 – 38 (even) London Road

Age	Mid-19th Century.
Rarity	Unusual for Harleston.
Architectural and artistic interest	Striking architectural grey brick, 3-storey town houses. Unusual for their time in Harleston.
Group value	5 terraced properties on London Road.
Archaeological interest	NA
Historical interest	Mentioned by Nikolaus Pevsner (German-British art historian and architectural historian).
Landmark status	Landmark in the town, because they are strikingly different from other properties in the town.



Figure 29: Five 3-storey Victorian properties, 30 – 38 (even) London Road.

6. Five pairs of semi-detached Edwardian 3-storey properties

11 – 29 (odd) on Station Road

Age	1906.
Rarity	Unusual for Harleston.
Architectural and artistic interest	Art and craft cottage look, with timber ornament to the porches and mock timber framing.
Group value	5 pairs of semi-detached properties on Station Road.
Archaeological interest	NA
Historical interest	Example of Edwardian architectural style.
Landmark status	NA



Figure 30: Five pairs of semi-detached Edwardian 3-storey properties, 11 – 29 (odd) on Station Road.

7. Cast iron cart weighbridge in the carriageway of Exchange Street

Adjacent to Rackham Funeral Directors

Age	1850s.
Rarity	Fairly rare.
Architectural and artistic interest	Cast iron cart weighbridge, with machinery in the adjacent Funeral Directors.
Group value	NA
Archaeological interest	NA
Historical interest	The weighbridge was used to weigh corn brought into Harleston by farmers, with samples being available to prospective buyers in the nearby Corn Hall, and it is a surviving reminder of Harleston's place as a centre for this trade.
Landmark status	An emblem of Harleston's origins as a central market for local farmers.



Figure 31: Cast iron cart weighbridge in the carriageway of Exchange Street.

8. Harold's or Herolf's stone in Stone Court

Owned by the owner of the adjoining Post Office

Age	Ancient.
Rarity	Unique.
Architectural and artistic interest	NA
Group value	NA
Archeological interest	Glacial erratic.
Archival interest	An important historic feature in the town.
Historical association	Claimed to be the stone on which the Danish chieftain Harold/Herolf stood to apportion land to local guilds. Local stories suggest that the town of Harleston is named after this stone.
Landmark status	Important as marking the long history of the town and the historical name origin of Harleston.



Figure 32: Harold's stone in Stone Court.

9. WWI air crash memorial in Church Lane, Redenhall	
On the Gawdy Hall estate	
Age	20th July 1917.
Rarity	Marker for a specific plane crash.
Architectural and artistic interest	NA
Group value	NA
Archaeological interest	NA
Historical interest	Memorial to the 2nd Lieutenant Joseph Leo Philips of the Royal Flying Corps whose airplane crashed at this spot in 1917. He was taken to the Norfolk and Norwich Hospital but died later that day. He was 21 years old, from Canada. Buried in Norwich.
Landmark status	Marker for a specific plane crash.



Figure 33: WWI air crash memorial in Church Lane, Redenhall.

10. WWII air crash American memorial in Green Lane	
Age	WWII, 11th April 1945. Memorial dedicated in 2011.
Rarity	Marker for a specific plane crash.
Architectural and artistic interest	NA
Group value	NA
Archaeological interest	NA

Historical interest	446th Bomb Group USA, mid-air collision between 42-51909 and 42-50790 on 11th April 1945, 2 miles south of Harleston. No survivors and both aircraft were destroyed.
Landmark status	Marker for a specific plane crash.



Figure 34: WWII air crash American memorial in Green Lane.

11. The Former Cherry Tree Public House (now Momiji restaurant) 74 London Road	
Age	Recorded as an inn since 1786, previously a farmhouse.
Rarity	One of the few surviving inns of great age in Harleston.
Architectural and artistic interest	Timber framed.
Group value	NA
Archaeological interest	NA
Historical association	Originally a farmhouse and part of the Dove House Estate, when converted to an inn it catered for the droving trade generated by the livestock market at the Bullock Fair ground. It remained an inn from 1786 until recently.
Landmark status	NA



Figure 35: The Former Cherry Tree Public House (now Momiji restaurant).

12. Stone Villa 66 London Road	
Age	1889.
Rarity	Unique features.
Architectural and artistic interest	Stone features around the mullioned windows, at the portico, at the edges of the front walls and under the roofline.
Group value	NA
Archaeological interest	NA
Historical association	Built by a local stone mason who occupied it, and who used to carve and store gravestones in an area adjacent to the house.
Landmark status	NA



Figure 36: Stone Villa.

13. Holly House 65 London Road	
Age	The current property was built in the 1860s.
Rarity	Unusual due to the side yard having being preserved.
Architectural and artistic interest	<p>The space at the side was used by the owner, a builder and carter, to store his cart and stable his horse. The boards are still on the yard floor where the cart would have stood.</p> <p>The house still has many original features, including the front door bell pull, parquet flooring in the hallway, the back door and porch, and chamfered detailing on plaster and woodwork.</p>

Group value	NA
Archaeological interest	NA
Historical association	The house was built by a local builder, who was the first town councillor with a trade background at a time when they were made up of landowners and professional men.
Landmark status	NA



Figure 37: Holly House.

Appendix D: Justification for Local Green Spaces

The tables and maps below outline the justification for the inclusion of each Local Green Space identified. The criteria are based on paragraphs 101-103 of the National Planning Policy Framework (July 2021).

1. Air crash memorial and woodland	
Description: Memorial woodland seat and signs in memory of a World War II airborne crash between two aircraft. Privately owned, Whipps Farm.	
In reasonably close proximity to the community it serves	Along the popular Green Lane walking and cycling route beyond the A143.
Demonstrably special to a local community and holds a particular local significance	Created by local people and commemorates a tragic accident.
Local in character and is not an extensive tract of land	Local in character. Small grass verge and woodland, not an extensive tract of land.



Figure 38: Air crash memorial and woodland.



2. Green space and playground at centre of Bullfinch Drive

Description: Green space and playground. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves

In the middle of new estate, surrounding by housing.

Demonstrably special to a local community and holds a particular local significance

Popular with families and dog walkers, surrounded by housing. There is a waiting list to obtain a new allotment.

Local in character and is not an extensive tract of land

Important facility for the community and not an extensive tract of land.



Figure 39: Green space and playground at centre of Bullfinch Drive.



3. Doune Way children's play area	
Description: Children's playground playground. Owned by South Norfolk Council.	
In reasonably close proximity to the community it serves	Green part of the housing estate used by the local community.
Demonstrably special to a local community and holds a particular local significance	Well-used by children and families, important green area on the estate. There is a waiting list to obtain a new allotment.
Local in character and is not an extensive tract of land	Important facility for the community and not an extensive tract of land.



Figure 40: Doune Way playground.



4. Junction of Dove Close and Needham Road

Description: Two green spaces on either side of the junction of Dove Close and Needham Road. Owned by Highways?

In reasonably close proximity to the community it serves

Part of the entrance to the housing estate.

Demonstrably special to a local community and holds a particular local significance

These are green areas with large mature trees giving a pleasant view at the entrance to a housing development. There is a waiting list to obtain a new allotment.

Local in character and is not an extensive tract of land

Important facility for the community and not an extensive tract of land.



Figure 41: Junction of Dove Close and Needham Road.



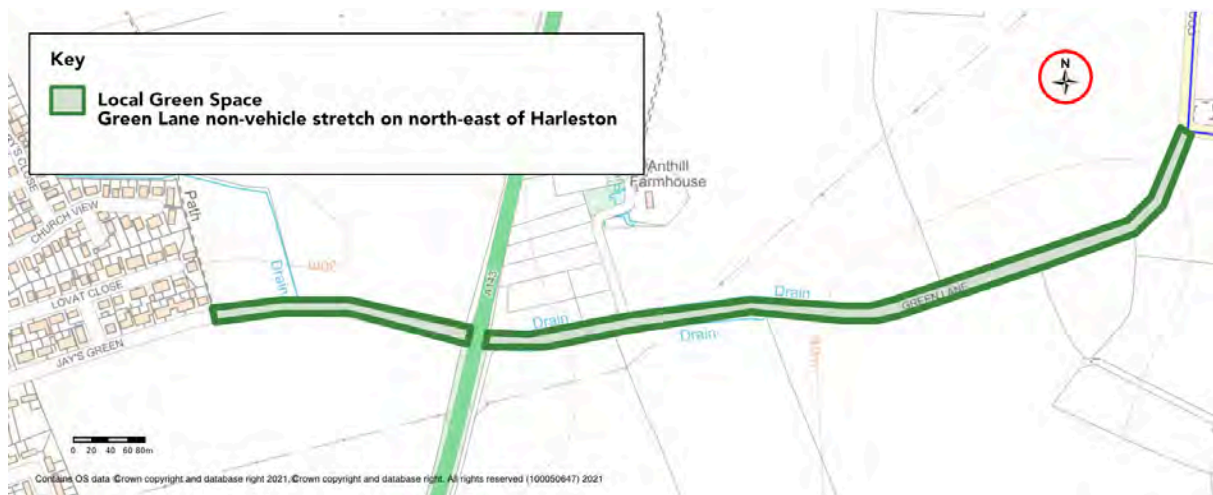
5. Green Lane non-vehicle stretch on north-east of Harleston

Description: At the end of Jays Green on Green Lane, there is a gate across the road and then the lane continues for pedestrians and cyclists as far as the A143. It is part of National Cycle route 30. Across the A143, the lane continues as a minor road past the air crash memorial (see separate entry) to the junction at the top of the junction of Cook's Lane and Cuckoo Lane, with views of Redenhall Church. Owned by Highways.

In reasonably close proximity to the community it serves	The route heads out from Jays Green, past the northern boundary of the proposed Briar Farm development, joins up with road Cook's Lane.
Demonstrably special to a local community and holds a particular local significance	Popular with dog walkers, families and cyclists. One of the best paths adjacent to the town. Trees provide a wildlife corridor. In 1980s trees were planted by the Town Council's tree warden along the route and elsewhere.
Local in character and is not an extensive tract of land	A path for the local community, not an extensive tract of land.



Figure 42: Green Lane non-vehicle stretch on north-east of Harleston.



6. Harvest Way ponds and open green area	
Description: Ponds and open green area alongside Harvest Way. In private ownership.	
In reasonably close proximity to the community it serves	Part of the Harvest Way development, with fields to the east.
Demonstrably special to a local community and holds a particular local significance	Green space for Harvest Way development.
Local in character and is not an extensive tract of land	Green space for the development, not an extensive tract of land.



Figure 43: Harvest Way ponds and open green area.



7. Harvest Way play area

Description: Green space at centre of housing estate including a children's playground, additional mown space and a mature hedge with large trees. Privately owned.

In reasonably close proximity to the community it serves	In the centre of housing on the Harvest Way estate.
Demonstrably special to a local community and holds a particular local significance	Used by families and residents.
Local in character and is not an extensive tract of land	Important green space in the middle of the development, not an extensive tract of land.



Figure 44: Harvest Way play area.



8. Henry Ward Road green space

Description: Green space with mature trees backing onto country. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves

On the edge of Henry Ward Road, adjacent to houses. Close to Maltings Drive area. Only green space in the area.

Demonstrably special to a local community and holds a particular local significance	Popular with the community for recreation. There is a waiting list to obtain a new allotment.
Local in character and is not an extensive tract of land	Important facility for the community and not an extensive tract of land.



Figure 45: Henry Ward Road green space.



9. Recreation ground, Wilderness Lane

Description: Principal green space and leisure area for Harleston, with outdoor facilities football, bowls, tennis, BMX track, outside gym equipment, MUGA, plus children's playground and leisure centre, including the Town Council offices. Owned by Redenhall with Harleston Town Council.

In reasonably close proximity to the community it serves	Adjacent to the town centre, serves the whole town.
Demonstrably special to a local community and holds a particular local significance	Very heavily used on daily basis.
Local in character and is not an extensive tract of land	An important green space for the town centre. Not extensive tract of land.



Figure 46: Recreation ground, Wilderness Lane.



10. Robin Way playground	
Description: Children's playground. Owned by the Sancroft Square Management Company Ltd.	
In reasonably close proximity to the community it serves	Surrounded by houses off Robin's Avenue.
Demonstrably special to a local community and holds a particular local significance	Well used by children and families from the local area.
Local in character and is not an extensive tract of land	Important green area for the estate. Not an extensive tract of land.



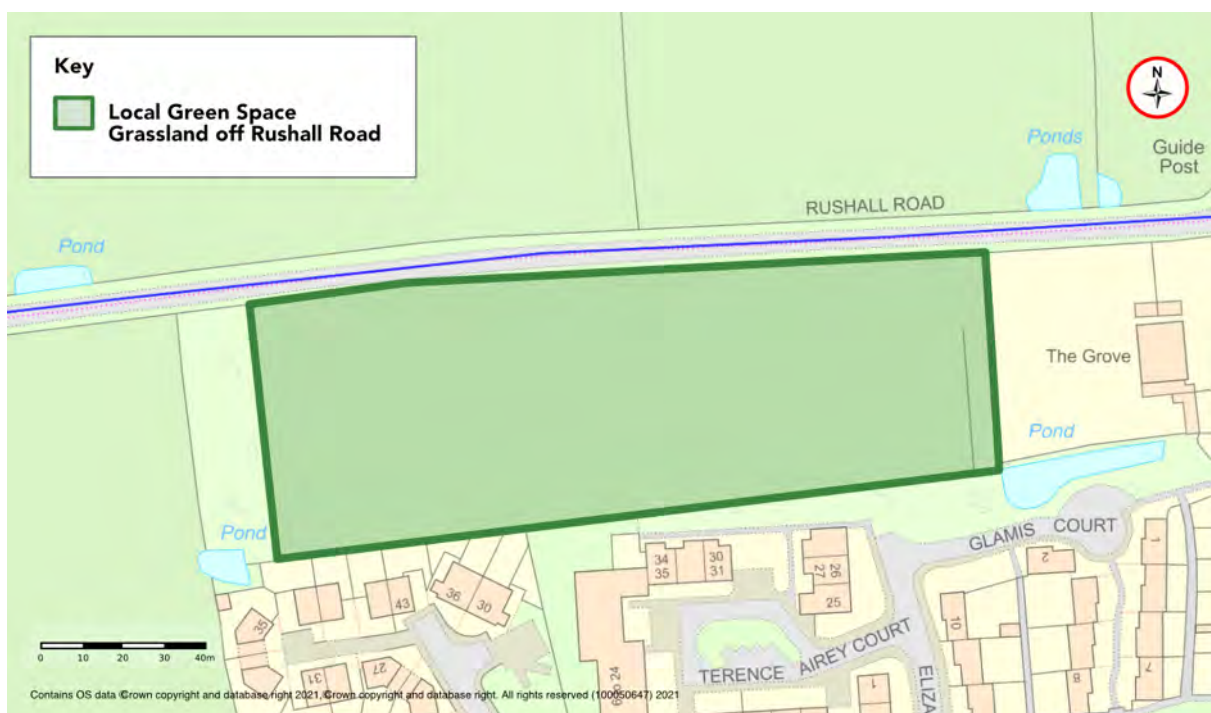
Figure 47: Robin Way playground.



11. Grassland off Rushall Road	
Description: Grassland adjoining Rushall Road to the south, containing trees and hedges. Owned by South Norfolk Council and leased to a farmer.	
In reasonably close proximity to the community it serves	Between Rushall Road and the housing on Titlow Road and Glamis Court.
Demonstrably special to a local community and holds a particular local significance	This is an area which provides an attractive open aspect to this entrance to the town, lined with trees and hedges, and which provides habitats for wildlife.
Local in character and is not an extensive tract of land	Important green entrance to the town. Not an extensive tract of land.



Figure 48: Grassland off Rushall Road.



12. The Common

Description: Common, grassed area with mature trees. Owned by Gawdy Hall estate. The Common is Registered Common Land, protected for public enjoyment under the provisions of the Countryside and Rights of Way Act (2000).

In reasonably close proximity to the community it serves

Surrounded by housing.

Demonstrably special to a local community and holds a particular local significance

Key feature of the neighbourhood. Used be a pond in the centre. Forms a tranquil space for the housing surrounding the space.

Local in character and is not an extensive tract of land

Important part of the local character of the area.
Not an extensive tract of land.



Figure 49: The Common.



13. Green spaces within the Titlow Road development	
Description: Playground and duck pond in Titlow Road area. Owned by Saffron Housing.	
In reasonably close proximity to the community it serves	Green space within the estate, surrounded by houses.
Demonstrably special to a local community and holds a particular local significance	Popular with families and dog walkers.
Local in character and is not an extensive tract of land	Green space as part of the estate. Not an extensive tract of land.



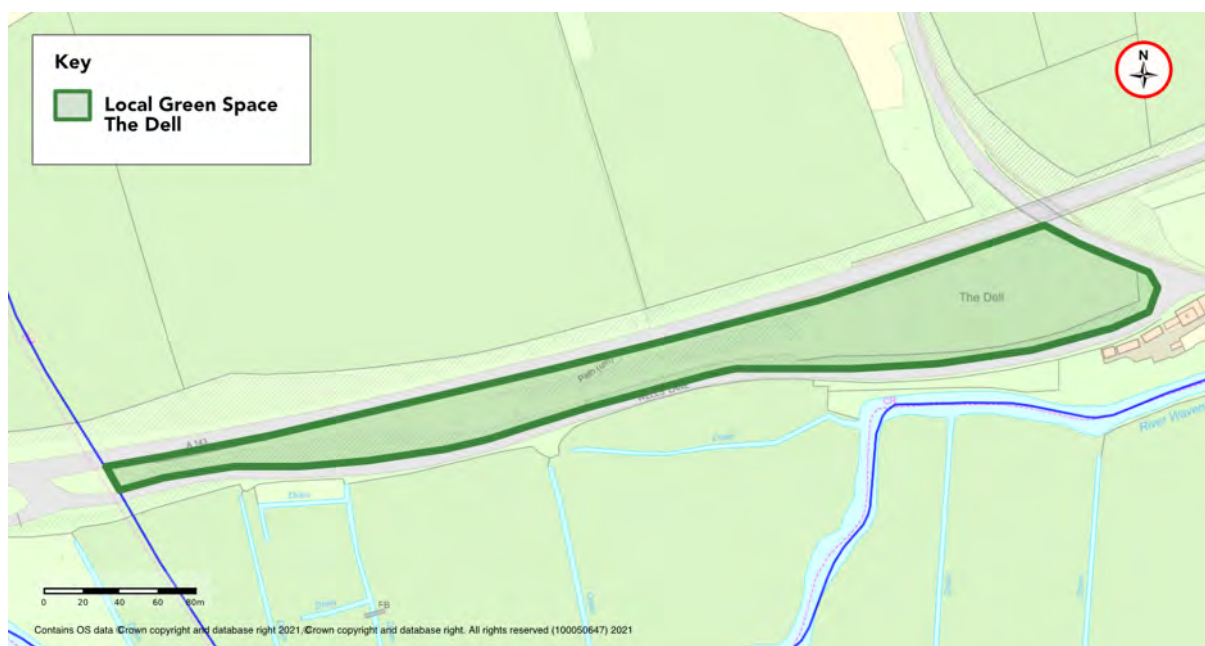
Figure 50: Green spaces within the Titlow Road development.



14. The Dell	
Description: The Dell, adjoining Wells Lane, sloping wooded area. Owned by Highways.	
In reasonably close proximity to the community it serves	Angles Way goes through the area, well used footpath from Harleston to the Waveney and Needham.
Demonstrably special to a local community and holds a particular local significance	This is a wooded area which provides a pleasant green backdrop to Wells Lane, which is a road taken by local residents wishing to walk into Needham.
Local in character and is not an extensive tract of land	Green aspect between Well's Lane and A143. Not an extensive tract of land.



Figure 51: The Dell.



15. Junction of Dove Close and Shotford Road	
Description: At the entrance to Dove Close from Shotford Road, an area of grass with two large trees. Owned by Highways.	
In reasonably close proximity to the community it serves	At the entrance to the housing development.
Demonstrably special to a local community and holds a particular local significance	This gives a pleasant open and tranquil view when approaching Dove Close and contains several trees. There is a waiting list to obtain a new allotment.
Local in character and is not an extensive tract of land	Provides green entrance to the housing development. Important facility for the community and not an extensive tract of land.



Figure 52: Junction of Dove Close and Shotford Road.



16. Junction of Shotford Road and Needham Road

Description: Green spaces on west side of the junction of Shotford Road and Needham Road, containing trees. Owned by Highways.

In reasonably close proximity to the community it serves

Part of the southern end of the entrance to the Harleston town. Junction of two roads.

Demonstrably special to a local community and holds a particular local significance

The space has two large trees, providing an attractive green area which softens the junction between two busy roads.

Local in character and is not an extensive tract of land

Part of the green aspect of the southern entrance to the town. Not an extensive tract of land.



Figure 53: Junction of Shotford Road and Needham Road.



17. Jays Green grass verge.

Description: Grass verge along southside of Jays Green. Owned by Highways?

In reasonably close proximity to the community it serves

South of housing estate and north of Briar Farm proposed development.

Demonstrably special to a local community and holds a particular local significance

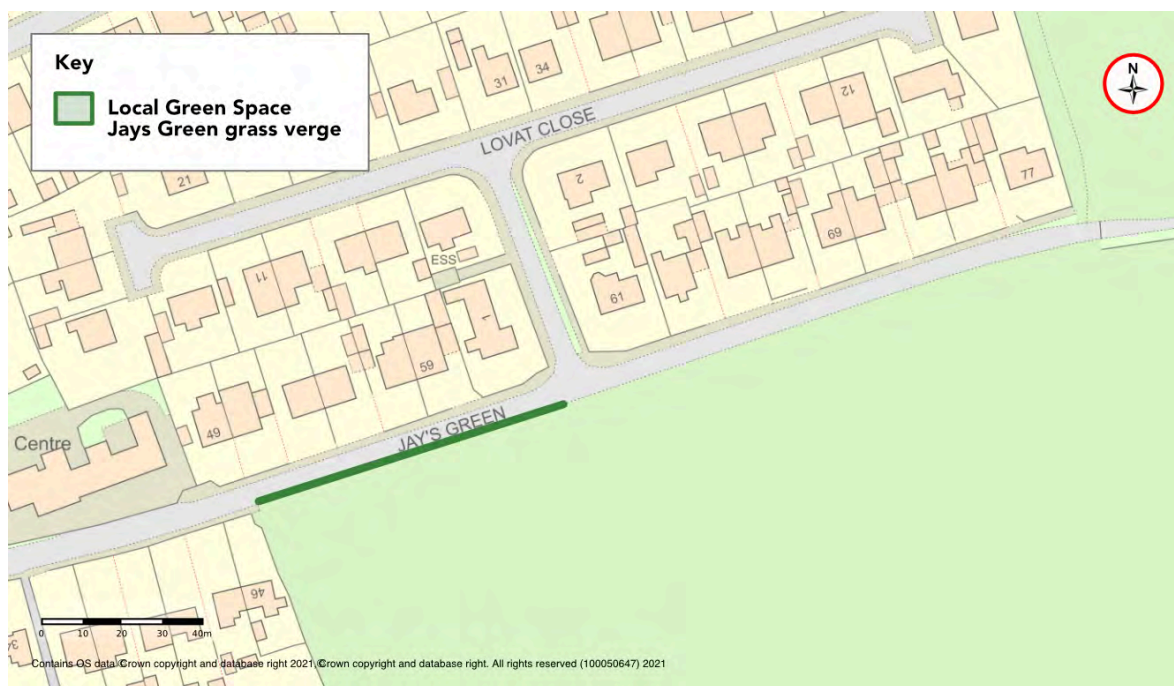
Green buffer between current housing development and proposed housing development. Part of the green aspect of the area. Well maintained in parts with seat. Part of the route to Green Lane walking path.

Local in character and is not an extensive tract of land

Green aspect of the area. Not an extensive tract of land.



Figure 54: Jays Green grass verge.



18. Church View green space

Description: An area of mown grass with several trees situated between Church View and houses on St. Mary's Close. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves

The area is opposite a street of houses on Church View.

Demonstrably special to a local community and holds a particular local significance

It gives the residents of those houses a green and pleasant open aspect.

Local in character and is not an extensive tract of land

An important green space for the surrounding houses, not an extensive tract of land.



Figure 55: Church View green space.



19. Nelson Close playground and green space

Description: Playground and mown green space at the centre of Nelson Close, a modern development. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves	It is a central feature of the housing development on Nelson Close.
Demonstrably special to a local community and holds a particular local significance	A green space which gives a pleasant open view to the residents of the surrounding houses.
Local in character and is not an extensive tract of land	The only green space in the development, not an extensive tract of land.



Figure 56: Nelson Close.



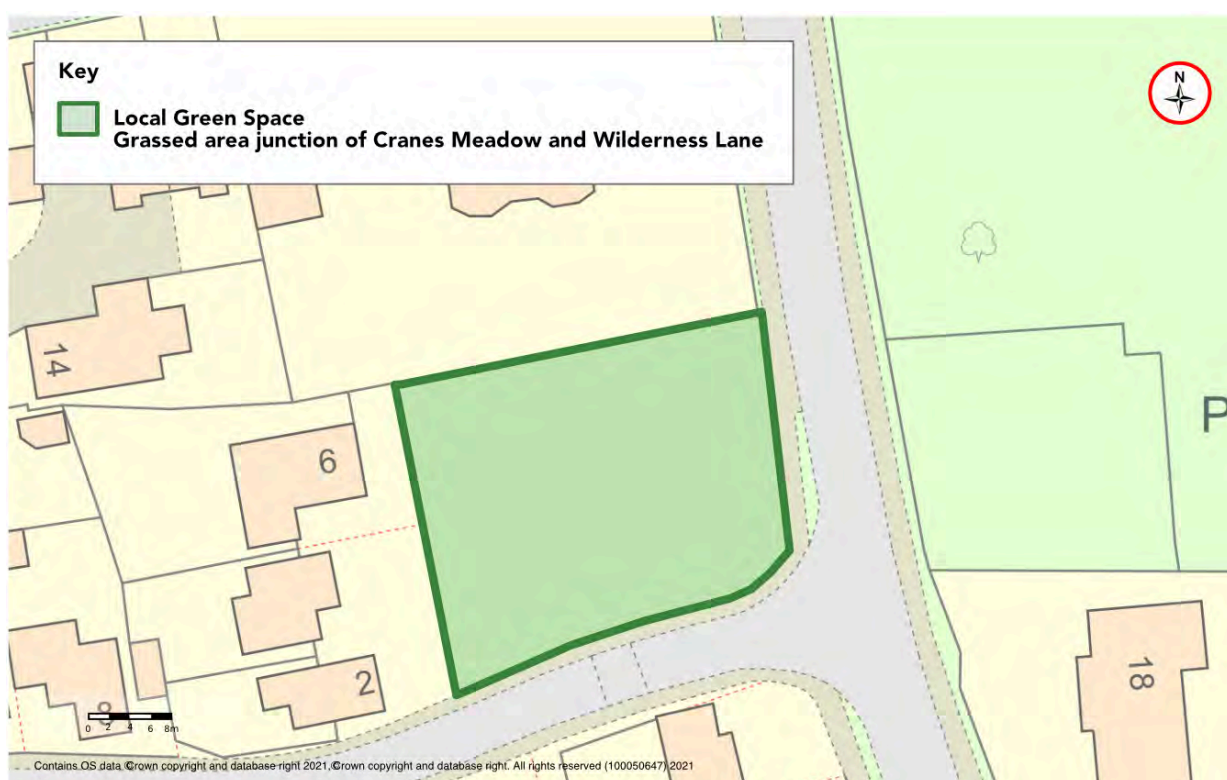
20. Grassed area junction of Cranes Meadow and Wilderness Lane

Description: Grassy area with attractive hedges at the junction of Cranes Meadow with Wilderness Lane. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves	The area is at the entrance to the houses on Cranes Meadow and provides an open green area at this approach.
Demonstrably special to a local community and holds a particular local significance	Well used by children and families.
Local in character and is not an extensive tract of land	Local to Cranes Meadow. Not an extensive tract of land.



Figure 57: Grassed area junction of Cranes Meadow and Wilderness Lane.



21. Frere Road

Description: Mown grass with mature trees, woodland area at back and scrubland area. A pond within the scrubland is hidden by undergrowth. Owned by South Norfolk Council.

In reasonably close proximity to the community it serves

Adjoins Frere Road and within easy reach of Titlow Road, Kerridge Way and Elizabeth Walk.

Demonstrably special to a local community and holds a particular local significance

Well-used by children and dog walkers.

Local in character and is not an extensive tract of land	Local to the surrounding streets. Not an extensive tract of land.
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Figure 58: Frere Road.



22. Harleston C.E. Primary Academy playing field	
Description: School playing field. Owned by Norfolk County Council.	
In reasonably close proximity to the community it serves	Yes, adjoins the primary school.

Demonstrably special to a local community and holds a particular local significance	This is a grassed area which serves the school as a playground, and for school events, as well as being used for sports including as a football pitch. There is a woodland area available to be used by the schoolchildren and adds an extra dimension to their days.
Local in character and is not an extensive tract of land	Important for local school children and not an extensive tract of land.



23. Archbishop Sancroft High School playing field	
Description: School playing field. Owned by Norfolk County Council.	
In reasonably close proximity to the community it serves	Yes, adjoins the High School.
Demonstrably special to a local community and holds a particular local significance	This is a grassed area which is used by the school as a playground and for school events. There is a football pitch which is used by the schoolchildren and by Harleston Football Club for training.

Local in character and is not an extensive tract of land

Important for local school children and not an extensive tract of land.



Figure 59: Archbishop Sancroft High School playing field.



Appendix E: Glossary

Glossary of terms used and/or relevant to the Redenhall with Harleston

Neighbourhood Plan and supporting submission documents. Definitions are taken directly from the glossary of the National Planning Policy Framework July 2021, , except where stated.

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20 per cent below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of Plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing** is that sold at a discount of at least 20 per cent below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20 per cent below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.

Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Build to Rent: Purpose built housing that is typically 100 per cent rented out. It can form part of a wider multi-tenure development comprising either flats or houses but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more and will typically be professionally managed stock in single ownership and management control.

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g., they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.

Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Non-strategic policies: Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

Non-designated heritage asset: Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'. A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process. *(Definition from <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#non-designated-heritage-assets>)*

Older people: People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Primary shopping area: Defined area where retail development is concentrated.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Strategic environmental assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic policies: Policies and site allocations, which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Strategic policy-making authorities: Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

Use Classes Order: National classification of land uses as contained within The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) (No. 2) Order 2021 (source: www.legislation.gov.uk).

Wildlife corridor: Areas of habitat connecting wildlife populations. Windfall sites: Sites not specifically identified in the development plan.



Redenhall with
Harleston
NEIGHBOURHOOD
PLAN

Redenhall with Harleston Neighbourhood Plan – Submission Version**Reg. 16 Response from South Norfolk Council**

Section of document	Comments
<p>Policy RWH7: Protection of Existing Community Facilities</p>	<p>As noted previously by South Norfolk Council, during the Reg. 14 consultation, criterion (b) of this policy seeks to impose a condition that cannot be implemented through a planning policy. Planning policy sets out requirements for the development and use of land, whereas this criterion relates to the ownership of property.</p> <p>Although it is noted that the Neighbourhood Plan seeks a stronger directive for the community ownership of facilities, the Government's Assets of Community Value legislation provides the legal framework within which communities have the opportunity to bid for the purchase of a community asset.</p> <p>In addition, to ensure that the policy is unambiguous and that decision makers are able to clearly apply it in the consideration of development proposals (in accordance with NPPF paragraph 16 (d)), the Council feels it is necessary to include an explanation within the supporting text as to how this policy should operate alongside Policy 3.16 ('Improving the level of community facilities') of South Norfolk Council's Development Management Document (2015).</p>
<p>Policy RWH9: Local Green Spaces</p>	<p>The Council notes the amendment that has been made to this policy in response to previous comments relating to the designation of school playing fields.</p> <p>Despite these amendments, the Council would raise again that school playing fields are not considered to be suitable for listing as proposed Local Green Space. The Council's concern is that, with the inclusion of these elements, it would not be appropriate to make the plan due to inconsistency with the NPPF and the related requirements of section 8(2)(a) of Schedule 4B of the Town & Country Planning Act 1990.</p> <p>In his report of April 2020 into the proposed Taverham Neighbourhood Plan (adopted May 2021), the independent examiner appointed made the following comments regarding school playing fields that were proposed as Local Green Spaces:</p> <p>'(...)Site Nos. 14, 26, 30 and 32 are all school playing fields (...).Paragraph 94 (now Para. 95) of the NPPF states that local planning authorities should give great weight to the need to create, expand or alter schools through the preparation of plans, and the designation of the respective playing fields as Local Green Spaces could place limitations on the possible future expansion of the schools concerned (...). I therefore recommend modification PM7(a) to delete (these) proposed Local Green Spaces (...) from the Policy and accompanying material in the draft Plan.'</p>

Section of document	Comments
<p>Policy RWH10: Town Centre Vitality and Viability</p>	<p>South Norfolk Council re-iterates its comments made during the Reg. 14 consultation stage that this policy would benefit from the introduction of a minimum marketing period, in order to reduce the possibility of there being long term vacant units within the town.</p> <p>The Council suggests a minimum period of six months, in line with its minimum marketing period under Policy 3.16 ('Improving the Level of Local Community Facilities') of the Development Management Policies Document (2015).</p> <p>As currently worded, this policy would result in undue restrictions being placed on vacant town centre buildings that could potentially be brought back into appropriate use.</p> <p>In addition, excessive restrictions can prevent the effective use of land. Preventing the effective use of land is contrary to paragraph 119 of the NPPF which states that:</p> <p>'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'</p>
<p>Policy RWH12: Small Scale, Day to Day retail in New Developments</p>	<p>The Council would simply note that, outside of the town centre, the authority would only expect larger, more strategic schemes to support an element of retail provision and that this would need to be additionally determined by a consideration of retail provision within the wider area. Therefore, whilst the Council does not object to the policy, it would simply note that the provision of retail on this basis would not be viable in the majority of circumstances.</p>



Equalities and Communities Impact Assessment

Name of Officer/s completing assessment: Richard Squires

Date of Assessment: 02/12//2021

1. What is the proposed Policy (please provide sufficient detail)?

For the purposes of the assessment the term 'Policy' relates to any new or revised policies, practices or procedures under consideration.

The **Redenhall with Harleston Neighbourhood Plan** is a community-led document for guiding the future development of the parish. It concerns the use and development of land between 2022 and 2038. It is the first Neighbourhood Plan that has been developed by and for the communities of Redenhall and Harleston. Once the Plan is made (adopted), it will become part of the statutory Development Plan for South Norfolk, and South Norfolk Council will use it (alongside documents making up the Local Plan) to determine planning applications covered by the neighbourhood area. The Town Council will also use the Plan to respond to planning applications.

The Neighbourhood Plan has been developed under the Localism Act (2012) and the Neighbourhood Planning (General) Regulations 2012 (as amended), giving communities the right to shape future development at a local level. The Redenhall with Harleston Neighbourhood Plan will complement existing local and national planning policy, providing a valuable level of local detail attained through consultation with residents and businesses, as well as through desk-based research.

The Neighbourhood Plan incorporates an overall vision for the parish, a series of objectives on different themes, and a range of policies that seek to achieve these objectives. The Plan was developed over a period of one year before being submitted to South Norfolk Council in November 2021, and the process has involved an exhaustive programme of evidence gathering and community and stakeholder involvement. South Norfolk Council will shortly be considering the submitted documents to ensure they meet certain criteria, before progressing the Plan to a Regulation 16 consultation. Following this, the Plan will undergo an independent examination, a referendum and (if successful) its final adoption.

The Neighbourhood Plan vision is as follows:

'Harleston will continue to be a small, thriving and attractive market town with a community feel. It will have a range of housing types and tenures to suit all ages and incomes, supported by appropriate infrastructure and employment opportunities. Development will be sustainable, well designed, and suitably located, integrated and connected. The surrounding area will remain rural, and the natural environment and local heritage will be protected. The area will continue to be a desirable place to live, work and visit for current and future generations.'

The objectives that seek to achieve this are split amongst the themes of:

- Housing and the built environment
- Community infrastructure
- Town centre, business and employment
- Access

- Natural environment

The Neighbourhood Plan also incorporates a Design Guide and Code.

2. Which protected characteristics under the Equalities Act 2010 does this Policy impact:
(indicate whether the impact could be positive, neutral, or negative)

Protected Characteristic	Positive Impact	Neutral Impact	Negative Impact
Age	✓		
Disability	✓		
Race		✓	
Sex		✓	
Religion or Belief		✓	
Sexual Orientation		✓	
Marriage/Civil Partnership		✓	
Pregnancy/Maternity		✓	
Gender Reassignment		✓	

3. Which additional Communities characteristics does this policy impact?

Protected Characteristic	Positive Impact	Neutral Impact	Negative Impact
Health	✓		
Place inc. Rurality	✓		
Low Income and Poverty	✓		

4. What do you believe are the potential equalities impacts of this policy?

Please include:

- Partnership organisations worked with in the development of this policy
- Evidence gathered to inform your decision
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be positive, neutral, or negative and impact groups differently

Like most Local Plan documents that are concerned with the development and use of land, the Protected Characteristics that are most impacted are Age and Disability. The former due to the pressures facing young people being able to afford housing in the community, and access employment locally, for example. Elderly people face issues such as being able to down-size to smaller, more suitable homes and being able to access community facilities. The Neighbourhood Plan takes measures to address these issues, primarily through Policy RWH1 (Housing mix), which supports a range of housing which would provide for the needs of these different groups within the community. In addition, Policies RWH5, RWH6 and RWH7 seek to protect existing and address the need for new community infrastructure (including medical, educational, green etc.).

The Neighbourhood Plan includes statements of evidence and justification alongside each of the proposed policies, explaining how public consultation with residents, as well as factual research, has informed the policy being proposed. One of the supporting documents published alongside the Neighbourhood Plan is a Consultation Statement which provides more detail of how and when public consultation and engagement was carried out, what the results of this were, and how these results have impacted subsequent development of the policies.

A Neighbourhood Plan Steering Group was formed by the Town Council to lead on the project with the help of external consultants. Throughout the process the steering group ensured that the local community and stakeholders were kept informed of the process and were able to get involved in the development of the Neighbourhood Plan. Stakeholder bodies that were consulted included Norfolk County Council, neighbouring parish and town councils, the Environment Agency, Natural England, Historic England, and South Norfolk Council, amongst others.

Communications methods used during the process included a local Neighbourhood Plan website; the parish magazine; Facebook; posters; flyers; A-boards; local radio etc. During the plan process, several public and stakeholder engagement methods were utilised, including online mapping, Zoom meetings, a business survey, a household survey and a face-to-face exhibition. This culminated in a statutory, pre-submission Neighbourhood Plan consultation that took place with the community and stakeholder bodies prior to the Plan being submitted to the Council.

The engagement and consultation process allowed the emerging policies to be discussed, tested and updated with local residents and stakeholders, before the draft Plan was finalised for submission.

Support has been provided by South Norfolk Council, in the form of officer guidance, but also through a grant award. Financial support was also provided by the national support body, Locality.

5. What do you believe are the potential communities impacts of this policy?

Please include:

- How the policy can meet agreed priorities
- Evidence gathered to inform your decision
- Partnership organisations worked with in the development of this policy
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be positive, neutral, or negative and impact groups differently

As explained above, the overall intention of the Neighbourhood Plan (as demonstrated by the Vision) is to encourage sustainable development and seek to benefit the entire community. The Neighbourhood Plan is required to demonstrate its contribution to sustainable development (encompassing economic, environmental and social sustainability). This is addressed in detail within the Basic Conditions Statement, which is one of the additional, supporting documents that the Parish Council is required to submit alongside its Neighbourhood Plan.

The following summary of how the Neighbourhood Plan contributes to sustainability is an excerpt from the Basic Conditions Statement:

‘The plan has been formulated with Sustainable Development at its heart. The embedded theme of sustainability is reflected in the overarching vision for the plan, which reflects the three distinct strands of sustainability – economic, environmental, and social.’

The Basic Conditions Statement also assesses the Plan against the National Planning Policy Framework Sustainable Development Objectives. The following illustrates those Neighbourhood Plan objectives and policies that help to address the social sustainability objective within the NPPF:

NNPF 2021:

A social objective: to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future

generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;

Contribution through Redenhall with Harleston Neighbourhood Plan Objectives and Policies :

Objective 1: To ensure that new housing development is of an appropriate mix that meets the current and future needs of the town.

Objective 2: To achieve high quality, well-designed and environmentally sustainable development which complements the distinctive character and heritage of Redenhall with Harleston.

Objective 3: To ensure that the provision of community infrastructure meets the needs of needs of the whole community and keeps pace with new housing growth.

Objective 4: To reinforce the important function of Harleston Town Centre as a viable, successful, accessible, and attractive centre for residents and visitors.

Objective 5: To support new employment opportunities and encourage existing underused or unused employment sites to move forward.

Objective 6: To ensure new developments provide transport connections both to the town and the wider countryside and to encourage self and healthy access for pedestrians and cyclists within the development

RWH1 Housing Mix

This policy sets out the preferred mix of housing to be provided in new developments.

RWH2 High quality design

This policy requires that all new development should be consistent with the principles laid out in the Design Guidance and Code which is a supporting document to the Neighbourhood Plan.

RWH5 Community Infrastructure and Growth

This policy supports new development where it can be demonstrated that the community infrastructure to support that growth can be made available.

RWH6 New community infrastructure

This policy supports the provision of new community infrastructure . Where new buildings and land are to be offered to the community, consultation will be carried out to establish the most appropriate use.

RWH7 Protection of existing community facilities

This policy seeks to protect existing community infrastructure from development proposals that would result in their loss, subject to criteria.

RWH8 New play areas, open spaces and sports provision

This policy supports the provision of new play areas, open spaces, and sports provision. It identifies 5 specific priorities.

RWH9: Local Green Spaces

This policy identifies a number of Local Green Spaces within the Neighbourhood Plan area which are to be protected in accordance with the NPPF.

RWH10 Town centre vitality and viability

This policy seeks to reinforce the important function of the town centre as a viable and attractive commercial centre. It seeks to retain retail uses within the town centre and supports residential development at first floor level

RWH11 Town centre enhancements

This policy supports development proposal that would result in the enhancement of the town centre including creating an attractive public realm and the creation of attractive spaces for use by local people and visitors

RWH12. Small scale , day to day retail in new developments

This policy supports the provision of small-scale retail in new development to meet the day to day needs of residents.

RWH14 Live work units

This policy provides support for new live-work units subject to criteria

RWH15 Traffic Generation and safety

This policy seeks to ensure that new development maximises the opportunities for sustainable transport including walking and cycling and that it does not result in unacceptable impacts on highway safety.

RWH16 Pedestrian and cycle connectivity

This policy supports the health and well-being of residents by encouraging the increase of walking and cycling levels and encouraging access into the countryside.

RWH17 Protection and enhancement of existing public rights of way

This policy seeks to protect and enhance existing public rights of way.

RWH18 Parking

This policy sets out the parking considerations to be taken into account for new developments.

6. How is it proposed that any identified negative impacts are mitigated?

Please include:

- Steps taken to mitigate, for example, other services that may be available
- If a neutral impact has been identified can a positive impact be achieved?
- If you are unable to resolve the issues highlighted during this assessment, please explain why
- How impacts will be monitored and addressed?
- Could the decision/policy be implemented in a different way?
- What is the impact if the decision/policy is not implemented?

This assessment does not identify any particular negative impacts or equalities-related issues concerning the Redenhall with Harleston Neighbourhood Plan. This is due, in large part, to the fact that the statutory planning process requires an assessment of the proposed plan's contribution to sustainable development as a matter of course. Neighbourhood Plans are required by law to have undergone appropriate community and stakeholder consultation, and to demonstrate that policies are evidenced, justified, deliverable, and sustainable.

If successful, and once made by South Norfolk Council, the Neighbourhood Plan will primarily be monitored by Harleston Town Council, but the District Council will also be able to assess its

implementation from a development management point of view and the determination of planning applications within the parish.

Signed by evaluator: **Richard Squires**

Signed by responsible head of department: **Helen Mellors**

Please send your completed forms to the equalities lead (Victoria Parsons) to be reviewed and stored in accordance with our legal duty.

REVIEW DATE - _____

(See Page 2 for details of reviews. Please send a copy of the reviewed document to Victoria Parsons)

Update to the Local Development Scheme

Report Author(s): Paul Harris
Place Shaping Manager
(01603) 430444
paul.harris@southnorfolkandbroadland.gov.uk

Portfolio: Policy and External Affairs & Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

Amendments to the current Local Development Scheme to reflect changes to the timetable for the South Norfolk Village Clusters Housing Allocations

Recommendations:

1. Cabinet to recommend that Council approves the proposed amendments to the current Local Development Scheme

1. Summary

- 1.1 The Local Development Scheme (LDS) sets out the timetable for preparing new local plans and summarises what they are to contain. This report sets out amendments to the timetable for the production of the South Norfolk Village Clusters Housing Allocations document and introduces proposals for the production of the East Norwich Masterplan SPD.
- 1.2 It is anticipated that the South Norfolk Village Clusters Housing Allocations document will be adopted by the end of 2023 and the East Norwich Masterplan SPD between September and November 2022.

2. Background

- 2.1 It is a legislative requirement for the Council to publish a Local Development Scheme and to keep this up to date under section 15 of the Planning and Compulsory Purchase Act, as amended by the Localism Act. The last update to the LDS was agreed in May 2021 and set out the timetable for the production of the Greater Norwich Local Plan and South Norfolk Village Clusters Housing Allocations Plan. This LDS can be viewed at:
<https://www.southnorfolkandbroadland.gov.uk/downloads/file/3630/south-norfolk-council-local-development-scheme-may-2021>
- 2.2 Policy 7.1 of the Greater Norwich Local Plan (GNLP) identifies East Norwich as a strategic regeneration area. It also sets out that the land adjoining the railway between the Deal Ground and Carrow Works would be redeveloped as part of the wider East Norwich strategy growth area masterplan supplementary planning document (SPD). The East Norwich Strategic Growth Area is defined in Map 9, page 100, of the GNLP. Due to the cross boundary nature of the site, an SPD for the whole area would need to be progressed jointly by Norwich City Council, South Norfolk Council and the Broads Authority.
- 2.3 Consultants Avison Young, Allies and Morrison, Hydrock and RPS were appointed by a public-private partnership including a number of key stakeholders including Norwich City Council, Homes England, Norfolk County Council and landowner interests to prepare a masterplan for the area. South Norfolk are not a funding partner but officer representatives from South Norfolk form part of the wider East Norwich Partnership Board.

3. Current position/findings

- 3.1 The adopted LDS projected publication of the proposed submission version of the document under regulation 19 in March 2022 and Submission of the document for Independent examination in July 2022.
- 3.2 Due to the volume of representations received during the recent Regulation 18 public consultation on the draft plan, the detailed content of some of those representations and the further technical work that needs to be carried out it is necessary to reconsider the timetable for the production of the VCHAP.

- 3.3 The new timetable for the Village Clusters document projects publication of a Regulation 19 consultation in June/July 2022 and Submission to the Secretary of State for independent examination in November/December 2022. Subject to any further consultation on Inspector's main modifications, this is expected to allow for adoption of the document by the end of 2023.
- 3.4 An update report on the progress of the VCHAP was reported to the Regulation and Planning Policy Committee on 30 November 2021. This is included as a background paper to this report.
- 3.5 The Stage 1 masterplan was reported to Norwich City Council's Cabinet on 17 November 2021. The purpose of the Stage 1 masterplan is to provide a clear understanding of the development potential of the East Norwich regeneration area, including assessment of the appropriate mix of land uses, infrastructure requirements, abnormal development costs and viability.
- 3.6 Following the agreement of Norwich City's Cabinet, work will shortly begin on Stage 2 (testing and refinement) of the Masterplan production, which is intended to lead into the production of the supplementary planning document referred to in Policy 7.1 of the Greater Norwich Local Plan.
- 3.7 It is intended that the Stage 1 Masterplan will be reported to the meeting of South Norfolk's Regulation and Planning Policy Committee on 25 January 2022. It is intended that the refined Stage 2 Masterplan will be reported to South Norfolk's Regulation and Planning Policy Committee and Cabinet for agreement prior to consultation beginning on any joint SPD.
- 3.8 It is currently proposed that consultation on the SPD takes place for a minimum of 6 weeks during the months of April and June 2022, to be adopted between September and November 2022 in line with the adoption of the GNLP.
- 3.9 The proposed updates to the LDS were considered by the Regulation and Planning Policy Committee on 30 November 2021. The Committee resolved to advise Cabinet to recommend that Council approves the proposed amendments to the current Local Development Scheme.

4. Proposed action

- 4.1 To ensure that the latest timetable for the production of the South Norfolk Village Cluster Housing Allocation Document is properly reflected in the LDS, and to ensure that the production of the East Norwich Masterplan is properly reflected, it is recommended that the LDS be updated in accordance with the current timetable for production of the Village Cluster Housing Allocation Plan and East Norwich Masterplan.

5. Other options

- 5.1 Failure to update the LDS may result in non-compliance with the Localism Act, with implications for the soundness and legal compliance of the Local Plan document.

6. Issues and risks

- 6.1 **Resource Implications** –production of the South Norfolk Village Clusters Housing Allocation Document is being undertaken within existing officer resources, supported by input from technical consultees. A dedicated budget has been made available for the Village Clusters document for 2020/21 and 2021/22, this is being utilised to provide necessary external support including the production of technical reports and the procurement of an online consultation platform. It is likely that elements of this dedicated budget will need to be rolled forwards into 2022/23 to reflect the revised timetable for the production of the plan.

The East Norwich Masterplan is funded by a public-private partnership led by Norwich City Council. South Norfolk Council is not a funding partner. Officer representation on the officer partnership board is being met within existing officer resources. Additional South Norfolk officer resource would be needed to support the consultation and adoption of the SPD.

- 6.2 **Legal Implications** – Not having an up-to-date LDS would conflict with the Localism Act (2011) and result in emerging Local Plan documents not being ‘sound’ and legally compliant.
- 6.3 **Equality Implications** – the LDS is not a policy, but is the document that sets out the timetable for the production of Development Plan Documents. As such, it does not itself impact on equalities. The timetable allows sufficient time for community engagement, as required under the Council’s Statement of Community Involvement (SCI). The Development Plan Documents will themselves be subject to equalities impact assessment.
- 6.4 **Environmental Impact** – none.
- 6.5 **Crime and Disorder** – none.
- 6.6 **Risks** – In addition to those risks identified above, it is possible that additional technical/planning issues arise during the production of the Village Cluster Housing Allocation Plan or finalisation of the East Norwich Masterplan. Any changes to the timetable, would necessitate further changes to the LDS and would be reported in due course.

7. Conclusion

- 7.1 For the reasons set out within this report it is necessary to update to LDS to reflect the amended timetable for the production of the South Norfolk Village Clusters Housing Allocation Plan, and to reflect the proposed timetable for the production of the East Norwich Masterplan SPD.

8. Recommendations

- 8.1 Cabinet to recommend that Council approves the proposed amendments to the current Local Development Scheme

Background papers

[Greater Norwich Local Plan Strategy](#)

[Greater Norwich Local Plan Sites Plan](#)

[South Norfolk Regulation and Planning Policy Committee 30 November 2021](#)

DRAFT Local Development Scheme for South Norfolk

November 2021



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1. Introduction

- 1.1 The Council is required to prepare a *Local Development Scheme* (LDS) under the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). The LDS is essentially a project plan which identifies, amongst other matters, the Development Plan Documents which, when prepared, will make up the Local Plan for the area. It must be made publicly available and kept up-to-date. This enables the public and stakeholders to find out about emerging planning policies in their area, the status of those policies, what the documents will contain, and the timescales for their production.
- 1.2 In addition to providing information about the development plan documents in preparation, this LDS also provides detail about the preparation of Supplementary Planning Documents (SPDs), and adopted local development documents, to provide a full account of the planning policies operating in South Norfolk. This document also refers to key documents supporting the production of the Local Plan.
- 1.3 The South Norfolk LDS does not cover the Broads Authority areas within South Norfolk, as the Broads Authority is a Local Planning Authority in its own right and produces its own LDS.

2. The Adopted Local Plan

Development Plan Documents (DPDs)

- 2.1 Development Plan Documents or DPDs, now more usually called 'Local Plans', are the formal policy documents which make up the statutory development plan for South Norfolk. Once adopted, these have full legal weight in decision making. The Council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the policies in the development plan, unless material considerations indicate otherwise.
- 2.2 The currently adopted development plan for South Norfolk comprises the following documents:
- *Joint Core Strategy for Broadland, Norwich and South Norfolk* (the JCS), adopted in March 2011, with amendments adopted January 2014;
 - *South Norfolk Site Specific Allocations and Policies Document*, adopted October 2015;
 - *South Norfolk Development Management Policies Document*, adopted October 2015;
 - *Wymondham Area Action Plan*, adopted October 2015;
 - *Long Stratton Area Action Plan*, adopted May 2016;
 - *Cringleford Neighbourhood Plan*, made February 2014;
 - *Mulbarton Neighbourhood Plan*, made February 2016; and
 - *Easton Neighbourhood Plan*, made December 2017;

Further details on the above can be found in Appendix 2.

- 2.3 Each document (apart from Neighbourhood Development Plans) must be prepared in accordance with a nationally prescribed procedure set out in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and be independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be adopted by the Council and come into force.
- 2.4 Certain other documents must be published alongside each Development Plan Document, including:
- a *sustainability appraisal (SA) report* of the DPD at each stage (a *sustainability appraisal scoping report* is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will

- use);
- a *policies map*, setting out the DPD's policies and proposals on a map base (if relevant);
- a *statement of consultation* summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
- copies of any representations made;
- any other supporting documents considered by the council to be relevant in preparing the plan;
- an *adoption statement* and *environmental statement* (when the plan is adopted).

Supplementary planning documents (SPDs)

- 2.5 Supplementary planning documents (SPDs) help to support and explain in more detail how the Council will implement particular policies and proposals in the local plan. SPD can also take the form of masterplans or detailed design briefs for sites allocated in the Local Plan. SPDs can be reviewed frequently and relatively straightforwardly to respond to change.
- 2.6 The National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) state that SPDs should be used '*where they can help applicants make successful applications or aid infrastructure delivery*', and should not be used to add unnecessarily to the financial burdens on development. SPDs should clarify and amplify existing policy, not introduce new policy or include excessively detailed guidance.
- 2.7 Current SPDs adopted by the Council are:
 - *South Norfolk Place-Shaping Guide SPD (September 2012);*
 - *Guidance for the delivery of a Food and Agriculture Hub for Broadland and South Norfolk SPD (July 2014); and*
 - *Guidelines for Recreation Provision in New Residential Developments SPD (September 2018)*

3. The LDS Programme

- 3.1 With an adopted Local Plan for the whole of South Norfolk's planning authority area, the focus is now on maintaining an up to date Plan in accordance with Government requirements. The focus of this work is on the replacement of the oldest part of the Local Plan, the JCS, with a new Greater Norwich Local Plan (GNLP). As well as replacing the JCS the GNLP will also allocate the sites to deliver future growth, replacing sections of the South Norfolk Site Specific Policies and Allocations Document, and potentially some elements of the Wymondham and Long Stratton Area Action Plans, The South Norfolk Development Management Policies Document and some Neighbourhood Plan.
- 3.2 The LDS also reflects the production of the South Norfolk Village Clusters Housing Allocations (VCHAP) Document. During production of the Regulation 18 draft GNLP it became apparent that the choice of sites available in the village clusters across South Norfolk was not producing the potential options that would successfully address the requirements in those settlements. Some parishes had few sites submitted, often detached from the settlement or with other issues raised via the initial Housing and Economic Land Availability Assessment (HELAA), consequently leading to a potentially greater concentration of development in other settlements. With its more extensive rural area, significantly larger number of small settlements/parishes, and consequently larger requirement for village cluster allocations than Broadland, the work to address the Village Clusters in South Norfolk is now being undertaken in a separate document. The overall strategic requirements, including the total number of new dwellings to be allocated in the Village Clusters, will continue to be set out in the GNLP
- 3.3 The profiles and timetables for the GNLP and VCHAP are set out in Section 4 below.

4. Local Development Document Profiles

Document Title	Greater Norwich Local Plan (GNLP)
Role and content	<p>To provide the strategic vision, objectives and strategy for future development of the Greater Norwich area, to accommodate objectively assessed needs for growth and to identify specific sites for development in the period to 2038.</p> <p>The areas to which the policies apply will be shown on the Policies Map.</p> <p>The GNLP provides the strategic context for the preparation of any lower level policy documents prepared by the three constituent district planning authorities, such as Development Management Policies or Area Action Plans.</p>
Status	Development Plan Document/Local Plan
Conformity	The document must conform with the National Planning Policy Framework (NPPF) and should also accord with standing advice in national the Planning Practice Guidance (PPG) and other Government Policy Statements.
Geographical coverage	The three districts of Broadland, Norwich and South Norfolk, excluding the parts of those districts falling within the Broads Authority Executive Area.
Joint working arrangements (if any)	The plan will be prepared jointly with Broadland District and Norwich City councils, working with Norfolk County Council.
Relationship with adopted local plan(s)	<p>The GNLP will supersede</p> <ul style="list-style-type: none"> a) the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk (adopted March 2011, amendments adopted 2014); and b) elements of the South Norfolk Site Specific Allocations and Policies Document (October 2015); and c) those other documents identified in the LDSs for Norwich City and Broadland District Councils <p>The Wymondham Area Action Plan (October 2015), the Long Stratton Area Action Plan (October 2015) and the South Norfolk</p>

	<p>Development Management Policies Document (October 2015) will not be superseded, although there may be elements of the GNLP that add to, amend or replace parts of those documents.</p> <p>The GNLP will be a component of the overall South Norfolk Development Plan, in conjunction with the retained documents and any 'made' Neighbourhood Plans.</p>
<p>Evidence required <i>May include selective reviews of the evidence base already in place for the adopted Local Plan and new or updated studies where necessary.</i></p>	<p>Includes (but may not be limited to):</p> <ul style="list-style-type: none"> • Strategic Housing Market Assessment (SHMA); • Housing and Economic Land Availability Assessment (HELAA); • New Settlement Topic Paper • Employment, Town Centre and Retail Study; • Viability Study • Infrastructure study; • Health Impact Assessment; • Strategic flood risk assessment (SFRA); • Water Cycle Study; • Landscape Character Assessment; • Green infrastructure study; and • Sport and recreation study. <p>The plan must be accompanied by a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) which will draw on, and themselves be part of, the evidence base</p>
<p>Production milestones (Timetable consistent with that for Norwich City and Broadland District Councils)</p>	
Commence document production.	December 2015
Call for sites – invitation to put forward specific development sites for inclusion in the GNLP.	May-July 2017
Commission, prepare and publish evidence studies required to support the GNLP.	March 2016 – January 2019

Publish initial Growth Options and Site Proposals (Regulation 18) for consultation.	January-March 2018
Publish the New, Amended and Small Sites (Regulation 18) for consultation.	October – December 2018
Publish Draft Plan (Regulation 18) for consultation.	January – March 2020
Publish Pre-Submission Plan (Regulation 19)	February – March 2021
Formal submission of GNLP to Secretary of State (Regulation 22).	July 2021
Public Hearings start	January - March 2022
Adoption of the Greater Norwich Local Plan.	September - November 2022
Arrangements for Production and Review	
South Norfolk Governance	Led by Place Shaping Agreement at each stage through Cabinet. Full Council approval at Regulation 22 and adoption.
How will stakeholders and the community be involved?	The Council will accord with the approved Statement of Community Involvement (SCI)
How will the document be reviewed?	<p>The document will be monitored and reviewed as part of the Annual Monitoring Report process.</p> <p>In accordance with the NPPF, Local Plans should be reviewed every 5 years. Such a review will need to determine whether any significant matters have arisen, for example through changes to national policy or the identification of additional development needs, that mean the Plan needs to be updated or replaced.</p> <p>The current timetable proposes adoption of the GNLP in September – November 2022, approximately 5 years from commencement of plan production. Consequently, the first review is scheduled for late 2027.</p>

Document Title	South Norfolk Village Clusters Housing Allocations document
Role and content	To allocate housing sites in the South Norfolk village cluster settlements, sufficient to meet the minimum requirements set out in the Greater Norwich Local Plan (GNLP).
Status	Development Plan Document/Local Plan
Conformity	The document must conform with the National Planning Policy Framework (NPPF) and the GNLP and should also accord with standing advice in national the Planning Practice Guidance (PPG) and other Government Policy Statements.
Geographical coverage	<p>Village Cluster parishes in South Norfolk Council, excluding the parts of those parishes falling within the Broads Authority Executive Area.</p> <p>Village Cluster parishes are all parishes, except: Chedgrave; Colney; Costessey; Cringleford; Diss; Easton; Framingham Earl; Framingham Pigot; Hethersett; Hingham; Loddon; Long Stratton; Poringland; Redenhall w Harleston; Trowse w Newton; and Wymondham. The document also excludes housing sites in: parts of Roydon and Heywood that relate to the settlement of Diss; parts of Tharston & Hapton that relate to the settlement of Long Stratton; and parts of Caistor St Edmund & Bixley and Stoke Holy Cross that relate to the settlement of Poringland/Framingham Earl.</p>
Joint working arrangements (if any)	None.
Relationship with adopted local plan(s)	The South Norfolk Village Clusters Housing Allocations document will supersede elements of the South Norfolk Site Specific Allocations and Policies Document (October 2015).
Evidence required <i>May include selective reviews of the evidence base already in place for the adopted Local Plan and new or updated studies where necessary.</i>	<p>Will include:</p> <ul style="list-style-type: none"> • Housing and Economic Land Availability Assessment (HELAA) <p>The document will draw largely on the evidence base that supports the strategic policies in the GNLP but will in certain instances require specific updates/additional work. This includes (but may not be limited to):</p> <ul style="list-style-type: none"> • Strategic Housing Market Assessment (SHMA); • Viability Study; • Infrastructure study; • Health Impact Assessment; • Strategic flood risk assessment (SFRA); • Water Cycle Study; • Landscape Character Assessment; • Green infrastructure study; and

	<ul style="list-style-type: none"> • Sport and recreation study. <p>The plan must be accompanied by a Sustainability Appraisal (SA) and Habitats Regulation Assessment (HRA) which will draw on, and themselves be part of, the evidence base</p>
Production milestones	
Commence document production.	January 2020
Call for sites – invitation to put forward specific development sites for inclusion as part GNLP Regulation 18.	January to April 2020
Publish Draft Plan (Regulation 18) for consultation.	June 2021
Publish Pre-Submission Plan (Regulation 19)	June/July 2022
Formal submission of GNLP to Secretary of State (Regulation 22) .	November/December 2022
Public Hearings start	April 2023
Adoption of the South Norfolk Village Clusters Housing Allocations Plan.	October 2023
Arrangements for Production and Review	
South Norfolk Governance	<p>Led by Place Shaping</p> <p>Agreement at Regulation 18 and 19 through Cabinet. Full Council approval at Regulation 22 and adoption.</p>
How will stakeholders and the community be involved?	The Council will accord with the approved Statement of Community Involvement (SCI)
How will the document be reviewed?	<p>The document will be monitored and reviewed as part of the Annual Monitoring Report process.</p> <p>In accordance with the NPPF, Local Plans should be reviewed every 5 years. Such a review will need to determine whether any significant matters have arisen, for example through changes to national policy or the identification of additional development needs, that mean the Plan needs to be updated or replaced.</p>

Document Title		East Norwich Masterplan
Role and content		A supplementary planning document (SPD) for the East Norwich Strategic Regeneration Area to support policy in the GNLP for the coordinated redevelopment of the site and delivery of transformational change of this key area of Norwich.
Status		Non-statutory supplementary planning document.
Conformity		The document must conform with the National Planning Policy Framework (NPPF), the relevant site allocation policy of the GNLP and should also accord with standing advice in national the Planning Practice Guidance (PPG) and other Government Policy Statements.
Geographical coverage		East Norwich sites including the Deal Ground, Utilities Site, May Gurney and Carrow Works identified on East Norwich masterplan map ¹ . This includes land with the local planning authority areas of Norwich City, South Norfolk and the Broads Authority.
Joint working arrangements (if any)		A public-private partnership board has been formed to support the delivery of this ambitious and long-term project – The East Norwich Partnership. The partnership is led by Norwich City Council and includes representatives from Homes England, South Norfolk Council, Norfolk County Council, the Broads Authority, New Anglia Local Enterprise Partnership, Network Rail and the landowners.
Relationship with adopted local plan(s)		The East Norwich Masterplan will be adopted as an SPD by Norwich City, South Norfolk Council and the Broads Authority to support policies set out in the emerging GNLP.
Evidence required <i>May include selective reviews of the evidence base already in place for the adopted Local Plan and new or updated studies where necessary.</i>		The East Norwich Masterplan SPD is based on a specific masterplan study commissioned by Norwich City Council on behalf of the public-private partnership board. A number of board members have contributed financially to the production of the Study.
Production milestones		

¹ [East Norwich regeneration: Project overview | Norwich City Council](#)

Completion of Masterplan	March 2022
Public Consultation (Regulation 12)	April - June 2022 (Minimum 6 weeks)
Adoption (Regulation 14)	September - November 2022
Arrangements for Production and Review	
South Norfolk Governance	Led by Place Shaping Agreement at Regulation 18 and 19 through Cabinet. Adoption by Full Council.
How will stakeholders and the community be involved?	The Council will accord with the approved Statement of Community Involvement (SCI)
How will the document be reviewed?	The document will be monitored and reviewed as part of the Annual Monitoring Report process. In accordance with the NPPF, Local Plans should be reviewed every 5 years, this will include the overarching allocation policy for East Norwich within the GNLP. Such a review will need to determine whether any significant matters have arisen, for example through changes to national policy or the identification of additional development needs, that mean the policy needs to be updated or replaced and by association whether any changes would be needed to the East Norwich masterplan.

5. Other documents related to the Development Plan Documents

- 5.1 Various other documents are required alongside the local plan, but do not form part of it. A **Statement of Community Involvement (SCI)** shows how the council intends to involve the community in plan preparation and planning decision making. The South Norfolk SCI was updated in June 2019 to reflect changes to national legislation and will be kept under regular review.
- 5.2 To ensure that plans and policies are effective, an **Annual Monitoring Report (AMR)** must also be prepared to record progress on implementing the local plan and whether local plan targets are being met. From 2011, the AMR for South Norfolk has been incorporated within a combined monitoring report for the Joint Core Strategy prepared jointly by the Greater Norwich authorities.

- 5.3 The **Norfolk Strategic Planning Framework (NSPF)** is a non-statutory strategic policy statement which sets broad targets and priorities for the next round of statutory Local Plans for individual districts and wider areas in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate. Consultation on the initial NSPF took place from July-September 2017, and the document was subsequently endorsed by all of the Norfolk authorities. During 2019 it was updated to reflect the requirements of the revised NPPF, in particular (a) so that it fulfils the remit of a 'Statement of Common Ground' and (b) so that it reflects the new 'standard' housing methodology and Version 2 was endorsed by all of the authorities in late 2019. In order to keep the document relevant and up to date, Version 3 of the NSPF has been prepared and is currently in the process of being individually endorsed by all relevant partner organisations.
- 5.4 Local Planning Authorities must to publish and maintain a statutory **Brownfield Land Register**. The register is intended to include details of any previously developed land suitable for housing, which is capable of accommodating five or more dwellings. The first Register was prepared for December 2017 and will be reviewed annually thereafter. The Brownfield Register is prepared jointly by the Greater Norwich authorities.

Appendix 1: South Norfolk Local Development Scheme Timetable – November 2021

South Norfolk Local Development Scheme Timetable - November 2021

	2021												2022												2023												
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
Greater Norwich Local Plan																																					
South Norfolk Village Clusters Housing Allocations Document																																					
East Norwich Masterplan SPD																																					
Policies Map - Update																																					

- Legend
- Preparation of document/evidence gathering to inform Reg.18 consultation
 - Regulation 18 (or equivalent for SPD) Consultation
 - Pre-Submission Publication of Plan (Regulation 19)
 - Submission to Secretary of State for Independent Examination (Regulation 22)
 - Examination
 - Adoption of Plan

Appendix 2: The Adopted Local Plan and Neighborhood Plans

Several planning documents are already in place to guide the council's decisions on planning applications: together these form the existing adopted Local Plan for South Norfolk. As these documents are already in use, they are not part of the formal LDS schedule set out in Appendix 1.

The documents making up the Local Plan must conform to national planning policy in the National Planning Policy Framework (NPPF), supported by national Planning Practice Guidance (PPG).

The Local Plan documents fit into a hierarchy with broad, strategic policies at the top and more detailed policies interpreting the strategic approach at a district or smaller area level.

For the Greater Norwich area (which includes South Norfolk), the adopted ***Joint Core Strategy for Broadland, Norwich and South Norfolk*** (JCS) is at the top of the hierarchy. The JCS was adopted in March 2011, with amendments adopted in January 2014. It is a strategic planning document prepared jointly by the three constituent districts in Greater Norwich and provides a long-term vision, objectives and spatial strategy for development of the area to 2026.

The ***Site Specific Allocations and Policies Document*** identifies and sets out policies for site allocations in South Norfolk indicating where development is expected to occur between now and 2026. Alongside the Wymondham Area Action Plan, the Cringleford Neighbourhood Plan and the Long Stratton Area Action Plan, it responds to the requirement of the JCS to identify additional sites for approximately 16,000 new homes in the district by 2026, over and above existing housing commitments at the JCS base date of April 2008. It also identifies opportunities to accommodate the overall levels of growth in jobs and services anticipated over that period and to ensure that these can be delivered and located sustainably. It will also help to deliver the community facilities and green infrastructure and elements of the sustainable transport network required to support new development as it occurs, in accordance with the JCS.

The ***Development Management Policies Document*** sets out a range of more detailed policies applying throughout South Norfolk which will be used in the council's assessment of development proposals and to guide future council decisions on applications for planning permission. Policies cover a range of topics, building on the national policy principles for sustainable development set out in NPPF and the strategic policies and objectives of the JCS. In certain cases, the policies also set out local criteria and standards for different kinds of development.

The ***Wymondham Area Action Plan*** guides development in the town up to 2026. The plan provides for at least 2,200 new homes and 20 hectares of employment land, in the context of: protecting and enhancing a 'Kett's Country Landscape' to strengthen the role of the Tiffney Valley; maintaining the strategic

separation between Wymondham and Hethersett; protecting the landscape setting of the town and abbey; and creating connections and linkages between green infrastructure.

The **Long Stratton Area Action Plan** will deliver at least 1,800 new dwellings, additional employment land, alongside the long- sought Long Stratton bypass to reduce congestion and pollution through the village in peak hours and improve connectivity along the A140 corridor.

The Localism Act 2011 allows for community led **Neighbourhood Development Plans** to be brought forward to complement the adopted Local Plan. There are existing Neighbourhood Plans for Cringleford, Mulbarton and Easton. The Poringland Neighbourhood Plan is proceeding to community referendum. The Long Stratton Neighbourhood Plan is proceeding to independent examination. Neighbourhood Areas, the first stage of developing a Neighbourhood Plan, have been formally agreed for the following: Dickleburgh; Diss & District (Diss, Burston & Shimpling, Roydon, Scole, and three parishes in Mid-Suffolk); Starston; Trowse w Newton; Tasburgh; Tivetshall and Wymondham.

Introduction of Monitoring Fees for S106 Agreements

Report Author(s): Stuart Pontin
Business Improvement Team Manager
01508 533796
Stuart.pontin@southnorfolkandbroadland.gov.uk

Portfolio: Planning

Ward(s) Affected: All

Purpose of the Report:

This report recommends the introduction of monitoring fees on developers in relation to developments granted planning permission, to cover the Council's cost of overseeing compliance with legal obligations under section 106 agreements. This proposal reflects the changes enacted by the Community Infrastructure Levy (Amendment) (England) (No2) Regulations 2019, which came into force on 1 September 2019.

Recommendations:

1. That the monitoring fees for section 106 agreements, as set out in Appendix 1, are adopted from 1 April 2022.

1. Summary

- 1.1 This report proposes the introduction of s106 monitoring fees on developers in relation to developments granted planning permission following the legislative amendments implemented by the Community Infrastructure Levy (Amendment) (England) (No 2) Regulations 2019, which came into force on 1 September 2019.

2. Background

- 2.1 The report reflects the monitoring fee reforms that have been ratified through legislation, Government consultation and Government practice guidance.

- 2.2 The Government's Technical Consultation on [Reforming Developer Contributions](#) (December 2018) notes at paragraph 55 that:

“...the Government proposes to specifically permit authorities to seek a monitoring fee through section 106 planning obligations. Any fee should be ‘proportionate and reasonable’ and reflect the actual cost of monitoring”.

- 2.3 [Regulation 10](#) of the amendment Community Infrastructure Levy Regulations 2019 inserted a new paragraph 2A to Regulation 122 of the Community Infrastructure Levy Regulations 2010. The inserted clause 2A specifies that the test laid out in Regulation 122 does not apply to planning obligations which require a sum to be paid to a local planning authority in respect of the cost of monitoring delivery of planning obligations, provided:

“(a) the sum to be paid fairly and reasonably relates in scale and kind to the development; and

(b) the sum to be paid to the authority does not exceed the authority's estimate of its cost of monitoring the development over the lifetime of the planning obligations which relate to that development”

- 2.4 The Government's [Planning Practice Guidance](#) on Planning Obligations explicitly states: “Authorities can charge a monitoring fee through section 106 planning obligations, to cover the cost of monitoring and reporting on delivery of that section 106 obligation”. It further outlines that monitoring fees can be used to monitor any type of planning obligation, for the lifetime of that obligation.

- 2.5 The Government Guidance further suggests that monitoring fees could be: a fixed percentage of the value of s106 obligations; a fixed monetary amount per agreement obligation; or authorities may set fees using alternative method. Provided always that “in all cases, monitoring fees must be proportionate and reasonable and reflect the actual costs of monitoring”.

3. Current position/findings

- 3.1 South Norfolk Council is currently actively monitoring 37 s106 agreements on commenced development sites, involving the monitoring of some 107 obligations with an approximate total of 513 triggers. Fees are generally not currently sought to cover the related costs of ensuring these obligations are complied with and fulfilled. Monitoring fees were charged in only two current instances, relating solely to Affordable Housing clawback clauses.
- 3.2 The monitoring of s106 agreements includes, but is not limited to: conducting site visits to determine progress, occupancy rates and occurrence of triggers; reviewing and formally approving schemes for affordable housing, open space, play areas and other on-site amenities; calculating financial contributions for off-site provisions and commuted sums for affordable housing clawbacks; raising invoices and following up overdue payments; ensuring contributions are spent within stipulated timescales and projects comply with legal obligations; issuing formal letters to developers confirming discharge of obligations; involvement in open space land transfers; working closely with developers and parishes with all matters relating to the s106; answering general enquiries and FOIs; annual completion of the Infrastructure Funding Statement.

4. Proposed action

- 4.1 The following charges are proposed to cover the costs involved in the monitoring of s106 agreements: £200 per obligation for developments of 1-10 dwellings, £300 per obligation for developments of 11-50 dwellings, £400 per obligation for developments of 51-200 dwellings, and £500 per obligation for developments of 201-400 dwellings.

4.1.1 Proposed monitoring fees summary table:

Development Size	1 – 10 Dwellings	11 – 50 Dwellings	51 – 200 Dwellings	201 – 400 Dwellings	400+ Dwellings or Multi-Phase/Strategic Site
Fee per Obligation	£200	£300	£400	£500	Bespoke
Maximum Total Fee	£2,000	£3,000	£4,000	£5,000	Bespoke

- 4.1.2 The charges proposed will be levied per obligation/infrastructure item. For example, there will be 3 x obligations charges for a s106 agreement that incorporates the following 3 obligations: 1. on-site affordable housing; 2. on-site green infrastructure; and 3. off-site open space commuted sum. Further examples are included in Appendix 3.
- 4.1.3 Based on the proposed tiered fees, the following typical total charges would be expected per agreement:

- 1-10 dwellings: £200 (1 obligation average)
- 11-50 dwellings: £900 (3 obligation average)
- 51-200 dwellings: £1,200 (3 obligation average)
- 201-400 dwellings: £1,500 (3 obligation average)
- 4.1.4 Appendix 2 includes a table set identifying the fee applicable per agreement, had the proposed monitoring charges been applied to the sites currently monitored in South Norfolk. Excluding sites over 400 dwellings, a total sum of £26,300 would have been received for the monitoring of these 31 agreements.
- 4.1.5 On major strategic housing sites, sites over 400 dwellings, or multi-phase s106 agreements, monitoring fees will be negotiated on a case-by-case basis. This allows parties to agree a charge in light of the potential numerous triggers, site-based complexities and significantly prolonged monitoring periods.
- 4.1.6 The Government's Planning Practice Guidance suggests the setting of a monitoring fee cap to ensure calculated fees are not excessive. An upper limit has therefore been incorporated into the suggested monitoring fees, calculated as 10x the applicable charge per obligation.
- 4.1.7 The monitoring charge will typically be payable on commencement of the development.
- 4.1.8 The monitoring fees levied will be reported in the annual Infrastructure Funding Statement.
- 4.2 The proposed fees are set at a nominal level, mitigating the potential of developer concerns. The proposed fees are at the lower end of the implemented fees among other proximate authorities, for example:
 - 4.2.1 £500/obligation is charged by Norfolk County Council.
 - 4.2.2 £412/trigger is charged by Suffolk County Council (N.B. a single obligation in South Norfolk s106 agreements typically has 3 triggers).
 - 4.2.3 £408/trigger is charged by East Suffolk Council.
 - 4.2.4 £250/agreement for 2-9 dwellings, £1,500/agreement for 10-49 dwellings and £3,000/agreement for 50+ dwellings is charged by South Cambridgeshire District Council.
- 4.3 Charges per agreement are not proposed as the degree of monitoring required directly correlates to the number of obligations included in the respective s106 agreement. For example, charging the same fee for an agreement containing one obligation versus five obligations is neither fair nor rational, and does not reflect the actual cost of monitoring. As such, charging per agreement would be contrary to the test laid out in the Community Infrastructure Levy Regulations 2019 (as amended).

- 4.4 The charges are tiered according to development size to ensure monitoring charges are reasonable and proportionate, and directly reflect the increased work involved in overseeing larger sites over extended time periods. A greater degree of monitoring is also required in the financial recording and spend allocation of the considerable commuted sums typically received from substantial development sites. The s106 agreements associated with these sites also tend to incorporate more triggers per obligation, complicating the respective monitoring and increasing the associated workload. Tiered costings therefore comply with the test provided by Regulation 10 of the 2019 amendments to the Community Infrastructure Levy Regulations.
- 4.5 Charges per trigger are not proposed. Charging per trigger complicates the calculation of fees causing difficulty for financial forecast, and also risks charging fees in excess of the actual cost of monitoring, contrary to legislation. In some instances, for example with the payment of off-site contributions on smaller sites, multiple triggers are included to alleviate the financial burden of a single lump sum; to then multiply the monitoring fee per trigger is potentially unreasonable. As highlighted in 4.4, the proposed tiered costings already acknowledge the greater number of triggers usually contained within obligations relating to larger sites.
- 4.6 In the Government's response to its technical consultation on reforming developer contributions, published June 2019, it details that for obligations where the district council is the local planning authority, but where obligations will require monitoring by the county council, "the Government considers that it is a matter for agreement between the district and county councils as to how the monitoring fee will be shared".
- 4.6.1 Norfolk County Council outline at paragraph 3.10 of their Planning Obligations Standards that a charge will generally be levied at a rate of £500 per obligation covering each infrastructure item sought. A charge per obligation/infrastructure item is similarly proposed in this report to avoid unfairly conferring liability on developers for both an overall agreement fee to the District Council, plus additional specific obligation fees to the County Council, potentially strictly double paying.
- 4.6.2 The maximum charge per obligation proposed in this report (applicable for developments of 201+ dwellings) is also set at £500 to avoid unreasonably exceeding the charge applied by Norfolk County Council.

5. Other options

- 5.1 A flat rate charge per obligation, applicable to all developments of up to 400 dwellings, could be applied. To ensure the fee levied complies with the amended Community Infrastructure Levy Regulations, this should be set at the lower limit of £200/obligation so that the fee is not unreasonably high in relation to smaller developments.

- 5.2 The fee relating to developments of 1-10 dwellings could be removed so that smaller scale developments are not burdened with liability for monitoring fees where the financial impact may be proportionately greater.

6. Issues and risks

- 6.1 **Resource Implications** – There are no immediate resource implications.

- 6.2 **Legal Implications** – The monitoring fees sought must comply with the legal test laid out in Regulation 10 of The Community Infrastructure Levy (Amendment) (England) (No 2) Regulations 2019. Specifically that the sum to be paid to the local planning authority fairly and reasonably relates in scale and kind to the development, and does not exceed the authority's estimate of its cost of monitoring the development over the lifetime of the planning obligations which relate to that development.

- 6.3 **Equality Implications** – No grounds have been identified that would require an equality impact assessment to be undertaken.

- 6.4 **Environmental Impact** – There are no immediate environmental implications.

- 6.5 **Crime and Disorder** – There are no crime and disorder implications.

- 6.6 **Risks** – There is a potential risk of developer concerns in response to the introduction of monitoring fees. This has been mitigated by proposing fees at a nominal level, that are proportionate to both development size and aggregate of obligations involved. Following the 2019 amendments to the Community Infrastructure Levy Regulations, the levying of monitoring fees is now explicit in law, diminishing potential disputes.

7. Conclusion

- 7.1 The implementation of s106 monitoring fees is proposed to cover the costs involved in overseeing compliance with obligations. Ensuring s106 obligations are fulfilled requires time and precision, and monitoring often occurs over substantial time periods where triggers are initiated pre-commencement and extend beyond completion.
- 7.2 The monitoring fees proposed will align the Council's practice relating to planning obligations with recent legislation and Government guidance.

8. Recommendations

That the monitoring fees for section 106 agreements, as set out in Appendix 1, are adopted from 1 April 2022.

Background papers

[The Community Infrastructure Levy Regulations 2010, Regulation 122](https://www.legislation.gov.uk/ukdsi/2010/9780111492390/regulation/122)

(<https://www.legislation.gov.uk/ukdsi/2010/9780111492390/regulation/122>)

[The Community Infrastructure Levy \(Amendment\) \(No 2\) Regulations 2019 \[September 2019\], Regulation 10](https://www.legislation.gov.uk/ukdsi/2019/9780111187449/regulation/10)

(<https://www.legislation.gov.uk/ukdsi/2019/9780111187449/regulation/10>)

[Government Response to Reforming Developer Contributions \[June 2019\]](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/806284/Developer_contributions_government_response.pdf)

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/806284/Developer_contributions_government_response.pdf)

[Norfolk County Council Planning Obligations Standards \[February 2021\]](https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/planning-obligations-standards-february-2021.pdf)

(<https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/planning/planning-obligations-standards-february-2021.pdf>)

[Planning Practice Guidance, Planning Obligations](https://www.gov.uk/guidance/planning-obligations)

(<https://www.gov.uk/guidance/planning-obligations>)

[Reforming Developer Contributions, Technical Consultation on Draft Regulations \[December 2018\]](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767292/CIL_Amendment_Regulations_Consultation_Paper.pdf)

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/767292/CIL_Amendment_Regulations_Consultation_Paper.pdf)

Appendix 1

Proposed monitoring fees:

Development Size	1 – 10 Dwellings	11 – 50 Dwellings	51 – 200 Dwellings	201 – 400 Dwellings	400+ Dwellings or Multi-Phase/Strategic Site
Monitoring Charge per Obligation Type	£200	£300	£400	£500	Bespoke
Maximum Total Fee per Agreement	£2,000	£3,000	£4,000	£5,000	Bespoke

Appendix 2

Monitoring fees that would have applied to the relevant 31 agreements currently monitored by South Norfolk Council (sites with <400 dwellings)

Number of Dwellings	Fee per Obligation	Number of s106 Obligations	Fee Charged
1	£200	1	£200
7	£200	1	£200
7	£200	1	£200
9	£200	1	£200
10	£200	1	£200
10	£200	1	£200
10	£200	1	£200
10	£200	2	£400
14	£300	1	£300
15	£300	2	£600
16	£300	2	£600
16	£300	2	£600
18	£300	3	£900
21	£300	1	£300
22	£300	2	£600
23	£300	3	£900
24	£300	6	£1,800
27	£300	2	£600
31	£300	5	£1,500
33	£300	4	£1,200
39	£300	3	£900
60	£400	4	£1,600
99	£400	2	£800
120	£400	3	£1,200
136	£400	2	£800
200	£400	2	£800
232	£500	2	£1,000
278	£500	4	£2,000
300	£500	2	£1,000
350	£500	5	£2,500
375	£500	4	£2,000

Total: £26,300

Appendix 3

Example total monitoring fee based on typical section 106 agreements:

Development Size (dwellings)	On-Site Affordable Housing	Affordable Housing Commuted Sum	On-Site Informal Open Space	On-Site Play	Other On-Site Amenity	Off-Site Commuted Sum	Facilities Commuted Sum	Total Fee
1 – 10	-	-	-	-	-	£200	-	£200
1 – 10	£200	-	-	-	-	£200	-	£400
11 – 50	£300	-	-	-	-	£300	-	£600
11 – 50	£300	-	£300	-	-	£300	-	£900
51 – 200	£400	-	£400	-	-	£400	-	£1,200
51 – 200	£400	-	£400	£400	-	£400	-	£1,600
201 – 400	£500	-	£500	-	-	£500	-	£1,500
201 – 400	£500	-	£500	£500	-	£500	-	£2,000
201 – 400	£500	£500	£500	-	-	£500	-	£2,000
201 – 400	£500	-	£500	£500	£500	£500	-	£2,500
201 – 400	£500	-	£500	£500	£500	-	£500	£2,500

Street naming and numbering policy

Report Author(s): Stuart Pontin
Business Improvement Team Manager
01508 533796
Stuart.pontin@southnorfolkandbroadland.gov.uk

Portfolio: Planning

Ward(s) Affected: All

Purpose of the Report:
To update the policy for street naming and numbering in South Norfolk Council

Recommendations:

1. Cabinet agrees the Street Naming and Numbering Policy as set out in appendix 1 with effect from 1 April 2022.

1. Summary

- 1.1 To update the street naming and numbering policy to clarify information needed with applications, the street naming conventions and to encourage engagement with Town and Parish Councils

2. Background

- 2.1 The Street Naming and Numbering Service maintains the Local Land and Property Gazetteer which is the only definitive source of property address data in England. Under national agreements, all addresses are created and maintained by Local Authorities in accordance with agreed standards (BS7666) and are uploaded on a daily basis to a national hub. Information is shared with a wide range of internal and external service providers and data sets are continually updated to ensure accuracy and matching.
- 2.2 Councils are the only body with the authority to create and amend addresses. (other than providing post codes the Royal Mail has no role in relation to addressing properties). As part of the street naming process, the Council does encourage developers to work with Town and Parish Councils in agreeing new street names. Information from the Gazetteer is used for services such as the Electoral Roll, Council Tax and Business Rates, Waste Collection, emergency services, Ordnance Survey and the Royal Mail.

3. Current position/findings

- 3.1 The Council's currently policy was adopted in 2017 and clarified the legislation used for the service. It also introduced charges for the service.
- 3.2 Following a review of the policy it is proposed to make minor changes to the text to policy to clarify information needed with applications, the street naming conventions and to encourage engagement with Town and Parish Councils in selecting new street names.
- 3.3 A copy of the amended street naming and numbering policy is attached at Appendix 1

4. Proposed action

- 4.1 It is proposed to implement the updated policy from that 1 April 2022.

5. Other options

- 5.1 The Council could continue with the current policy.

6. Issues and risks

- 6.1 The proposed updates to the policy clarify the street naming and numbering process and will reduce uncertainty should the Council need to enforce addressing issues in the future.

- 6.2 **Resource Implications** – There are no resource implications.
- 6.3 **Legal Implications** – There are no legal implications
- 6.4 **Equality Implications** – There are no equality implications
- 6.5 **Environmental Impact** – There are no environmental impact implications
- 6.6 **Crime and Disorder** – There are no crime and disorder implications
- 6.7 **Risks** – are there other risks associated with these proposals and how can these be mitigated?
7. **Conclusion**
- 7.1 The updated policy will add further clarity to the process
8. **Recommendations**
- Cabinet agrees the Street Naming and Numbering Policy as set out in appendix 1 with effect from 1 April 2022.

Street Naming and Numbering Policy

Summary

The document describes the Council's policy for its functions regarding Street Naming and Numbering and give details on our standards for street name plates.

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1 Introduction

- 1.1 Any new development or alterations to existing developments will require Planning and/or Building Regulations approval. This will also give rise for the need to name streets and number properties by the Council, the only authority with the powers to do these tasks.
- 1.2 The naming and numbering of streets and buildings is a Statutory Function of the Council and the Council has adopted Sections 17- 18 of the Public Health Acts 1925 and Sections 64 & 65 of the Towns Improvement Clauses Act 1847. The purpose of this control is to make sure that any new street names, building names and numbers are allocated logically with a view to ensuring, amongst other things, that emergency service vehicles are able to speedily locate any address to which they may be summoned; and the effective delivery of mail. The council has introduced a scale of charges for this function, under Section 93 of the Local Government Act 2003.

The charges cover:-

- Consultation and liaising with external organisations such as Royal Mail.
 - The process of naming or numbering of new properties (including conversions & alias).
 - Alterations in either name or numbers to new developments after initial naming and numbering has been undertaken.
 - Notifications to organisations listed in Section 3.5.
 - Confirmation of addresses.
- 1.3 These charges are to be paid in advance. Changes made without contacting the Council will not be entered onto either the National Gazetteer or the Postal Address file and therefore may not be registered with services and organisations listed in Section 3.5. Please see Section 11 for current fees.
- 1.4 The purpose of this document is to provide advice to developers and building occupiers on the naming and numbering policy of the Council. The Council is happy for developers or occupiers to propose names for consideration, and encourages early engagement with the parish or town council to discuss proposed names. Alternatively the council can contact the relevant parish or town council for their road name suggestions on the developer's behalf. It is suggested that more than one new name is submitted, and that the names proposed meet the criteria set out in Sections 4 – 6 below. The Council's decision ultimately is final.
- 1.5 It is recommended that parish and town councils consider proposals for streetnames in advance of developments commencing, ie. where local plan allocations, neighbourhood plan allocations or planning applications are approved and discuss these with developers.

2 Applying for a new address

- 2.1 Names for new roads should be jointly agreed between the developer and parish or town council
- 2.2 Applications should be made by individuals or developers covering all new buildings, including new houses, commercial or industrial premises,
- Or:
- Individuals or developers undertaking conversions of existing residential,

commercial or industrial premises which will result in the creation of new properties or premises.

- 2.3 Applications for new addresses should be submitted as soon as possible after planning permission has been granted. This is important, as utility companies are often reluctant to install services where an official address has not been allocated.
- 2.4 Applications can be made by completing the application form that can be downloaded from <https://www.southnorfolkandbroadland.gov.uk/planning/street-naming-numbering>.
- 2.5 The following information should be provided by the developer:
- A location plan clearly identifying the new scheme, in relation to any existing streets or means of access.
 - A detailed approved plan of the development (site layout plan) clearly marked with the plot numbers of the proposed scheme. This plan must indicate the postal delivery point for each property and the main entrance (if different) in relation to the adjacent highway.
 - An internal layout, if appropriate, for developments that are sub-divided at unit or floor level, e.g. a block of flats annotated with individual plot numbers. The main entrance to the flats shall be clearly marked in relation to the adjacent highway.
 - One set of central Eastings and Northings for each building
- 2.6 The completed form & plans should be sent to
streetnaming.snc@southnorfolkandbroadland.gov.uk or posted to Street Naming and Numbering
South Norfolk Council
Cygnet Court
Long Stratton
Norwich
NR15 2XE
- 2.7 Where possible, we are happy to take location plans and site layout plans from the associated planning application, but to do this, you must send us the appropriate planning application number & the correct approved drawing numbers.
- 2.8 Developers must be aware that marketing names for developments are not to be confused with street names. It should be made clear in the literature distributed to purchasers that marketing names for the development may not form part of the final official address for the property. The Council reserves the right in all circumstances to replace a marketing name with a street name of its choosing. If an application for naming and/or numbering is submitted at a late stage of the development, problems could arise, especially if the application is rejected and purchasers have bought properties marketed under an unofficial marketing title.

3 Procedure

- 3.1 Once an application for naming has been received, the Council will check that there is no duplication or similar existing street names within the geographic location.
- 3.2 The Council will check that the proposed street names accord with the General Naming Conventions, Street Naming Conventions and Building Naming and Numbering Conventions as outlined in Sections 4 – 6 of this document.

- 3.3 Where a name is not proposed by a developer, the Council will request the relevant Parish or Town Council to suggest street names. A temporary holding objection may be lodged by the Council in the meantime. We aim to have a reply back within 21 days.
- 3.4 For new streets the Council will inform the Royal Mail of the name(s) that has/have been agreed and the numbering of the properties on the street(s). The Royal Mail is responsible for allocating appropriate post code(s) & post town.
- 3.5 Please note that Royal Mail have strict criteria for issuing postal addresses that do not cover agricultural buildings and land, ancillary buildings and some public buildings.
- 3.6 The Council will also notify the following organisation of changes to property names, property numbering and new streets
- The Emergency Services
 - Norfolk County Council
 - The Valuation Office
 - Ordnance Survey
 - CNC Building Control
 - SNC Departments
- 3.7 We will not normally inform utility companies, they are commercial organisations and can obtain information from other sources.
- 3.8 Ultimately, the Council has the right to object to any name proposed for a new street by the owner or developer by giving notice of objection within one month. The proposer may then within 21 days after service of the notice of objection appeal to a Magistrates Court.

4 General Naming Conventions

- Street names should not be difficult to pronounce or awkward to spell.
- In order to avoid offence either by inclusion or exclusion of an individual's name, the name of living persons should be avoided. Where the naming is proposed posthumously, agreement from the person's family or estate administrators should be obtained by the applicant and a copy sent to the Council attached to the application. Only the first or last name will be used and not both to avoid the possible occurrence of future information coming to light that may taint that specific road name and give rise to costly street name procedures for both residents and council alike.
- The street names should, where possible, reflect the history or geography of the site or area.
- Street names that could be construed as advertising should be avoided.
- Street names that could be considered offensive must be avoided.
- The use of North, South, East or West (as in Norwich Road North and Norwich Road South) should be avoided when the road is in two separate parts. In such a case, one half should be completely renamed.
- Phonetically similar names within an area should be avoided (i.e. Norwich Road and Norwich Close, or Churchill Road and Birchill Road).

5 **Street Naming Conventions**

5.1 When naming new streets, the following conventions should be considered.

All new street names should end with one of the following:

- Avenue (for residential roads)
- Circus (for a roundabout only)
- Close (for a cul-de-sac only)
- Court (for a cul-de-sac only)
- Crescent (for a crescent shaped road)
- Drive (for residential roads)
- Gardens (for residential roads – subject to there being no confusion with local open space)
- Grove (for residential roads)
- Hill (usually for residential roads, particularly if there is a hill in the area)
- Lane (for development of a historic by-way or residential roads)
- Mead (for residential roads)
- Mews (for residential roads)
- Place (for residential roads)
- Rise (for residential roads)
- Road (for any thoroughfare)
- Row (for residential roads)
- Square (for a square only)
- Street (for any thoroughfare)
- Vale (for residential roads in exceptional circumstances)
- Walk (for residential roads in exceptional circumstances)
- Way (for major roads and residential roads)

5.2 All pedestrian ways should have the following suffixes:

- Walk
- Path
- Way

5.3 In addition to the above, we are happy to use historic names as the suffix for a road, such as Loke, Pightle, Drift and others with a Norfolk connection.

5.4 The use of names with royal connotations. The consent of the Lord Chamberlain's office must be received if a name with any reference to the royal family or the use of word 'Royal' is proposed.

6. **Building Naming and Numbering Conventions**

6.1 When naming / numbering a new building, the following conventions should be considered:

- Main roads should be numbered so that when travelling away from the centre of the settlement, odd numbers are on the left and even numbers on

the right

- A new street should be numbered with even numbers on one side and odd numbers on the other. A proper sequence should be maintained using all numbers without omissions.
- Properties (including those on corner sites) are numbered according to the street on which the main entrance is found. The manipulation of numbering in order to secure a "prestige" address or to avoid an address will not be sanctioned.
- For dwellings in existing unnumbered roads it is essential that they are officially allocated names, which are registered with the emergency services. Anyone wishing to change the name of an unnumbered property must also apply to this Council using the renaming application form (See Section 7).
- Where a property has a number, it must be clearly displayed. Where a name has been chosen for a property with a number, only the number will form part of the official address. The name cannot be regarded officially as an alternative. This is enforceable under Towns Improvement Clauses Act 1847.
- Where an existing street or similar is to be extended, it would normally be appropriate to continue to use the same street name. This would include the continuation of the street numbering.
- If a building has entrances in more than one street and is a multi-occupied building with each entrance leading to a separate occupier, then each entrance should be numbered in the appropriate road. Exceptions may be made, depending on circumstances, for a house divided into flats or with flat conversions
- The use of numbers followed by letters is permissible. These may be needed, for example, when one large property is demolished and replaced by a number of new properties. The Council is reluctant to renumber existing properties (see Section 7); therefore, the new premises will be given a number followed by a letter. This will be allocated by adding a letter to the lower of the two numbers on either side of the development. For example, a new property between 4 and 6 (evens only) would be allocated 4A, not 6A.
- The use of letters will not be sanctioned if the new development were to be situated before the numbering scheme commencing. For example, if 4 houses were built prior to the first property number 2, the new dwellings would not become 2A, 2B, 2C and 2D, but four individual property names would be requested.
- Private garages and ancillary buildings used for housing cars, etc, will not be numbered.

7 Changing a Property Name

7.1 Where there is no formal street numbering system a property name forms part of the postal address. Occasionally, requests are made to change this name.

7.2 In these cases, the owner should fill out an application form and send to the Council indicating:

- The existing house name, address and postcode.
- The proposed new name.
- A plan showing the exact location of the property.

- 7.3 A check will be made to ensure there is no other property in the geographic area with the name or similar name. It is normal practice to seek the views of Royal Mail for their advice on the proposed name. This may result in the proposal not being supported.
- 7.4 Once approved the council will inform Royal Mail of the revised name and appropriate other services will also be informed, see Section 3
- 7.5 We will accept only applications for renaming if you are the freeholder of the property. If you are the leaseholder, tenant, occupant or one of a number of occupants we will require written confirmation from the freeholder giving consent for the property to be renamed. Please note when you complete the application form you are confirming that you have the legal right to request renaming. It will be necessary to submit any written consent required at the same time the application is submitted.

8. Renaming and Renumbering of Existing Streets and Buildings

- 8.1 On rare occasions, it may be necessary to rename or renumber an existing street. This is usually only done as a last resort when:
- There is either no official name or there is confusion over a street's name and/or numbering
 - A group of residents are unhappy with their street name- (costs incurred by this process will be payable to the Council by each of the residents of the streets before the renaming is completed, please see section 11)
 - New properties are built and there is a need for other properties to be renumbered to accommodate the new properties
- 8.2 The number of named-only properties in a street is deemed to be causing confusion for visitors, delivery or emergency services.
- 8.3 Residents of the affected street will be consulted, and their views will be taken into account. We will also consult the Royal Mail.

9. Naming of unnamed roads

- 9.1 The Council has a duty to ensure all roads within the district are officially named.
- 9.2 If there are any unnamed roads within the district the Council will informally consult with the appropriate parish or town council to agree the name for such roads.
- 9.3 We will also informally consult parish or town councils where necessary when there is the need for local knowledge regarding anything to do with existing street names, e.g. where specified streets start and finish.
- 9.4 There are also many instances where a road has been formally named by the Council but does not appear on Royal Mail's Postal Address file. We will try and resolve these discrepancies wherever possible.
- 9.5 We will formally publicise in accordance with the Public Health Act 1925 any alteration of a name or any assigning of a name being proposed by the Council by order. Any person aggrieved may appeal to a Magistrates Court within 21 days of posting up of the notice.
- 9.6 In all cases we will keep the Royal Mail informed of any changes which need to be reflected in their Postal Address file.

10. Street Nameplates

- 10.1 Every street must be clearly signposted with nameplates positioned at principal junctions so as to be easily readable by both pedestrians and drivers.
- 10.2 Developers can either provide and install these plates themselves, in accordance with the Council's Design Guide and Specification, or can have them produced and installed and be re-charged for the cost of doing so.
- 10.3 The need to avoid unnecessary street furniture will always be a key consideration where practical. The site and location of street nameplates will, therefore, be carefully considered by officers for appropriateness.
- 10.4 The Council's standard for street name plates is
11g aluminium pressed street nameplate 6" deep, with 3½" Kindersley letters in white and ½" white border on a black non-reflective background. The nameplate to include the "No through road" symbol, where appropriate.
Stands are manufactured from 40mm x 40mm x 3mm angle mild steel, galvanised.
As an alternative, nameplates can be fixed on black (recycled) plastic posts and boards
- 10.5 The Council will provide replacement nameplates where these have become severely damaged or illegible
- 10.6 The Council will also attempt to ensure that, in due course and subject to available resources, every populated road in the district will have nameplates
- 10.7 Developers will normally be expected to pay for and install nameplates for all new streets to the Council's design standard. The developer to also agree the proposed locations of the nameplates in consultation with the Council.

11. Fees (including VAT)

New Developments	
1 plot	£126
2-5 plots	£252
6-10 plots	£379
11-20 plots	£631
21-50 plots	£1262
51 + plots	£1893
Naming New Street	No charge
Property Name change / add alias	£63
Changes to Layouts after SNN process completed	No charge
Confirmation of Address	No charge
Renaming Street	No charge

12 The NLPG and LLPG

- 12.1 The Council is responsible for maintaining information relating to the National Land and Property Gazetteer (NLPG). This is done by maintaining a Local Land and Property Gazetteer (LLPG).

- 12.2 The LLPG and NLPG will be updated to include all authorised new street names, building names and numbering. These will be made in accordance with British Standard BS7666 “Spatial Data-sets for geographical referencing”.
- 12.3 The Council is not responsible for assigning post codes or post towns to addresses. The Royal Mail does this. Any queries about post codes or post towns can be dealt with by the Royal Mail by calling 0906 302 1222 (Postcode Enquiries) or via their website at <http://www.royalmail.com/portal/rm/>

Further information and Advice

For further advice on any aspect of street naming and numbering, please contact the Gazetteer and Addressing Officer on 01508 533811

or email : streetnaming.snc@southnorfolkandbroadland.gov.uk

LEGISLATION

PUBLIC HEALTH ACT 1925 (SECTIONS 17-18)

NAMING OF STREETS

Section 17 – Notice To Urban Authority Before A Street Is Named

1. Before any street is given a name, notice of the proposed name shall be sent to the urban authority by the person proposing to name the street.
2. The urban authority, within one month after the receipt of such notice, may, by notice in writing served on the person by whom notice of the proposed name of the street was sent, object to the proposed name.
3. It shall not be lawful to be set up in any street an inscription of the name thereof:-
 - a) Until the expiration of one month after the notice of the proposed name has been sent to the urban authority under this section; and
 - b) Where the urban authority have objected to the proposed name, unless and until such objection has been withdrawn by the urban authority or overruled on appeal;

and any person acting in contravention of this provision shall be liable to a penalty not exceeding [level 1 on the standard scale] and to a daily penalty not exceeding [£1].

4. Where the urban authority serve a notice of objection under this section, the person proposing to name the street may, within 21 days after the service of the notice, appeal against the objection to a petty sessional court.

Section 18 – Alteration Of Name Of Street

1. The urban authority by order may alter the name of any street, or part of a street, or may assign a name to any street, or part of a street, to which a name has not been given.
2. Not less than one month before making an order under this section, the urban authority shall cause notice of the intended order to be posted at each end of the street, or part of the street, or in some conspicuous position in the street or part affected.
3. Every such notice shall contain a statement that the intended order may be made by the urban authority on or at any time after the day named in the notice, and that an appeal will lie under this Act to a petty sessional court against the intended order at the instance of any person aggrieved.
4. Any person aggrieved by the intended order of the local authority may, within 21 days of the posting of the notice, appeal to a sessional court.

TOWN IMPROVEMENT CLAUSES ACT 1847 (SECTIONS 64-65)

Naming Streets

And with respect to naming the streets and numbering the houses, be it enacted as follows:-

Numbering Of Houses

Section 64: The commissioners shall from time to time cause the houses and buildings in all or any of the streets to be marked with numbers as they think fit, and shall cause to be put up or painted on a conspicuous part of some house, building, or place, at or near each end, corner, or entrance of every such street, the name by which such street is to be known; and every person who destroys, pulls down, or defaces any such number or name, or puts up any number or name different from the number or name put up by the commissioners, shall be liable to a penalty not exceeding £25 [level 1 on the standard scale] for every such offence.

Renewal Of Numbers

Section 65: The occupiers of houses and other buildings in the streets shall mark their houses with such numbers as the commissioners approve of, and shall renew such numbers as often as they become obliterated or defaced; and every such occupier who fails, within one week after notice for that purpose from the commissioners, to mark his house with a number approved of by the commissioners, or to renew such number when obliterated, shall be liable to a penalty not exceeding £20 [level 1 on the standard scale], and the commissioners shall cause such numbers to be marked or to be renewed, as the case may require, and the expense thereof shall be repaid to them by such occupier, and shall be recoverable as damages.

CABINET CORE AGENDA 2021/22

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
4 Jan	Key	Street Naming and Numbering Policy	Stuart Pontin	Lia Neal	
	Key	S106 Agreements Monitoring Fees	Stuart Pontin	Lisa Neal	
	Key	Best in Class Housing Allocation Policy Review	Richard Dunsire	Alison Thomas	
	Key	Minimum Energy Efficiency Standards	Mike Pursehouse / Kevin Philcox	Alison Thomas	
	Key	Food Enterprise Park Development Proposal	Nina Cunningham	Lisa Neal	Exempt
	Key	South Norfolk Local Development Scheme Update	Paul Harris	John Fuller / Lisa Neal	
	Key	Review of Environmental Enforcement Penalties	Nick Howard	Graham Minshull	
		Submission of Redenhall with Harleston Neighbourhood Plan	Richard Squires	John Fuller/ Lisa Neal	
	Key	Browick Interchange Infrastructure Loan	Nina Cunningham	Lisa Neal	Exempt
		Submission of the Starston Neighbourhood Plan	Richard Squires	John Fuller/ Lisa Neal	
	Key	Finance Cash Receipting System Business Case	Rodney Fincham	Adrian Dearnley	Exempt
	Key	Planning, Regulatory, Housing Standards and Waste Team Services IT Migration	Stuart Pontin	Adrian Dearnley / Alison Thomas / Lisa Neal	Exempt
		Scrutiny Recommendations	Emma Goddard	Alison Thomas	
7 Feb	Key	Procurement for EIAS Internal Audit	Fay Haywood	Adrian Dearnley	
	Key	Adoption of Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy	Paul Harris	Lisa Neal	
	Key	Establishing a Community Infrastructure Fund	Emily Larter / Sally Hoare	Lisa Neal	
		Framingham Earl Leisure Centre Contract Extension	Steve Peet	Richard Elliott	
		Revenues and Benefits System	M Pursehouse / R Finch	Adrian Dearnley	
	Key	GN 5 Year Infrastructure Investment Plan	Paul Harris	John Fuller	
	Key	Council Tax Assistance	Richard Dunsire	Alison Thomas	

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
	Key	Health and Wellbeing Strategy	Mike Pursehouse	Alison Thomas	
	Key	Revenue Budget and Council Tax	Rodney Fincham	Adrian Dearnley	
	Key	Capital Strategy and Capital Programme	Rodney Fincham	Adrian Dearnley	
	Key	Treasury Management Strategy Statement 22/23	Rodney Fincham	Adrian Dearnley	
	Key	Delivery Plan and Budget 22/23 and 23/24	Sinead Carey / Rodney Fincham	Adrian Dearnley	
14 Mar		South Norfolk and Broadland Rough Sleeper Strategy 2022-25	Richard Dunsire	Alison Thomas	
		Member Ward Review	Kerrie Gallagher	Alison Thomas	
		Anti-Social Behaviour Policy	Nick Howard	Graham Minshull	
	Key	South Norfolk Village Clusters Housing Allocations Regulation 19 Publication	Paul Harris	Lisa Neal	
		Submission of the Wymondham Neighbourhood Plan	Richard Squires	John Fuller/ Lisa Neal	
		Submission of Tivetshall Neighbourhood Plan	Richard Squires	John Fuller / Lisa Neal	
		Q3 Performance, Risk and Finance Report	Sinead Carey	Kay Mason Billig	
19 Apr	Key	Submission of Diss and District Neighbourhood Plan	Richard Squires	John Fuller/ Lisa Neal	
		Future Adult Care Integration	Mike Pursehouse	Alison Thomas	
		Community Offer and Events Brand Package	Mike Pursehouse	Alison Thomas	
		Social Value in Procurement	Mike Pursehouse/ Rodney Fincham	Alison Thomas / Adrian Dearnley	

Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council's net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral wards in the area of the local authority.