



Long Stratton Neighbourhood Plan Examination

Response to examiner questions from Long Stratton Town Council as the qualifying body for the Long Stratton Neighbourhood Plan. May 2021.

Examiner question:

2. Policy SC1 – “up to date housing needs assessments applicable to the plan area”: *Where, specifically, is an applicant to find guidance on the required dwelling types and sizes? Is this the Long Stratton Housing Needs Assessment 2017 (or any successor document)? For clarity and convenience, could not the present requirements be set out in the reasoned justification?*

Response from the NP group:

2.1 The Long Stratton Housing Needs Assessment (HNA) 2017 was prepared to inform the work of the Long Stratton Neighbourhood Plan (LSNP). At present, the Long Stratton HNA provides the most up to date assessment of need applicable to the plan area.

2.2 Planning practice guidance states that a neighbourhood plan policy *should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared*¹. It is important that Policy SC1 details the housing needs that should be met through new development. Otherwise, the policy will fail to reflect and respond effectively to local circumstances.

2.3 At the same time, the Neighbourhood Plan recognises that the plan period extends to 2036 and that more up to date evidence on housing needs in the plan area may become available during this time. Policy SC1 has been drafted so that the most up to date evidence on housing needs informs decision-making.

2.4 The second paragraph in Policy SC1 sets out specific needs in terms of two and three bedroomed properties and the needs of entry level purchasers on low and medium incomes.

2.5 The information set out in paragraphs 5.1.4 through to 5.1.13 explains the housing needs evidence that is set out in the Long Stratton HNA 2017, together with other relevant information relating to the household characteristics in the plan area. The key points being made in these paragraphs are:

- During the period 2017 to 2026, the Long Stratton HNA 2017 estimates a need for 408 additional homes arising from the Long Stratton NP area (noting here that the NP recognises that the Long Stratton strategic site allocation is intended to meet a wider need to reflect Long Stratton’s status in the district settlement hierarchy).
- 70% of the need arising from the Long Stratton NP area falls in the category of 2- and 3-bedroom properties.
- The proportion of Long Stratton residents aged 75+ is expected to increase from 9% of the population in 2011 to 14 % of the population by 2031.
- Smaller properties in Long Stratton including rental properties are the only properties that people on medium incomes in the plan area can afford.

¹ Paragraph: 041 Reference ID: 41-041-20140306

Revision date: 06 03 2014



Examiner question:

3. Policy SC1 – “with reference site-specific context”: Is this wording as intended?

Response from the NP group:

3.1 The wording should state: “with reference to site-specific context”.

3.2 The NP group recognise that in certain cases on smaller development schemes, site specific circumstances such as the predominant built form in an area may have an impact on what the most appropriate house types would be.

Examiner question:

4. Policy SC1: How are low and medium incomes to be defined? Is the reference necessary given that the provision is directed at entry-level purchasers?

Response from the NP group:

4.1 Both the Long Stratton Demographic and Socio-Economic review (the DSE review) and the Long Stratton HNA use the terms low and medium incomes. A household on a low income is usually defined as the lowest 25% of household incomes in any given area. A medium income is the value separating the upper half from the lower half.

4.2 Both the DSE review and the Long Stratton HNA report explain the obstacles facing households on both low and medium incomes in purchasing a property. As set out in paragraph 5.1.27 of the NP, the Long Stratton HNA 2017 finds that 50% of all households in Long Stratton would not be able to afford for sale housing without additional equity.

4.3 The intention of the wording in Policy SC1 is to give consideration to entry level purchasers who are on low and medium household incomes since this is a more accurate reflection of current needs in the plan area.

Examiner question:

5. Policy SC2: Does the Class C3 Use Class (Classes C3(a), (b) and (c)), cover the entirety of provision that it is intended to encourage under the specialist housing heading?

Response from the NP group:

5.1 It is possible that a particular development involving specialist housing will fall into the C2 group (residential institutions), depending on the level of care and scale of communal facilities. The first paragraph of Policy SC2 is intended to cover all types of specialist housing.

Examiner question:

6. Policy SC2 – “A proposal [singular] for a new residential institution (class ‘C2’) will be supported”: Is only one proposal to be supported?

Response from the NP group:

6.1 No. This is not the intention of the wording. The intention of this wording is to set out the circumstances for when a residential institution will be supported under this policy.



Examiner question:

7. Policy SC3 – size and tenure of affordable homes: *For clarity and convenience, could not the present requirement be set out in the reasoned justification?*

Response from the NP group:

7.1 The second paragraph of Policy SC3 requires applicants to use the information set out in the Long Stratton HNA and other up to date information relating to Long Stratton affordable housing needs before ascertaining the specific affordable housing needs to meet as part of a development proposal.

7.2 This is to help ensure a proposal is drawn up specifically with Long Stratton affordable housing needs in mind.

7.3 Planning practice guidance states that a neighbourhood plan policy *should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared*². It is important that Policy SC3 requires applicants to use the information set out in the Long Stratton HNA and other up to date information relating to Long Stratton affordable housing needs before ascertaining the specific affordable housing needs to meet as part of a development proposal. Otherwise, there is a risk that the available local evidence on affordable housing needs is not adequately consulted and there is a risk that the policy fails to reflect and respond effectively to local circumstances.

Examiner question:

8. Policy SC3 – close connection priority: *Should not the proportion be specified?*

Response from the NP group:

8.1 The first paragraph of this policy requires the affordable homes being delivered under Local Plan policy to contribute towards meeting Long Stratton specific affordable housing needs (which is evidenced and explained in more detail in the Long Stratton HNA 2017 and the DSE Review). This involves offering a proportion of the affordable housing to local people first.

8.2 Ideally, yes, a proportion should be specified. However, in the current circumstances, it is felt the current wording provides a sensible policy approach.

8.3 As part of plan preparation, the housing needs in the plan area has been a subject of discussion between the Long Stratton NP group and officers at South Norfolk, including the housing enabling officer. As set out in paragraph 5.1.23 of the plan, the proportion will be determined on a case-by-case basis by South Norfolk Council, but it should be a meaningful proportion of the overall level of affordable housing planned. If the Local Plan requirements for 33% of affordable housing is met, the expected level of affordable housing provision in the plan area is at least 600 new homes. The Long Stratton HNA projects a need for 132 affordable dwellings in Long Stratton during the period 2017 to 2026, equating to 22% of the expected delivery through the strategic site allocation.

² Paragraph: 041 Reference ID: 41-041-20140306

Revision date: 06 03 2014



- 8.4 Specifying a specific proportion is not considered helpful at this time for two reasons:
- i. firstly, affordable housing needs in Long Stratton may change over time and setting a specific proportion may result in under-delivery.
 - ii. secondly, we understand South Norfolk Council officers are only able to apply a local connection criterion to socially rented properties (since these are administered by the council). This means the overall proportion must vary according to the amount of socially rented properties a scheme delivers. A mechanism for securing a local connection criterion on affordable homes for sale is not yet identified albeit, it is hoped this situation will progress.

Examiner question:

9. Policy SC3: *Please comment on the representations of Orbit Homes (failure to provide for affordable housing need).*

Response from the NP group:

9.1 Orbit Homes have recommended in their response that *Policy SC3: Affordable homes meeting Long Stratton needs* is amended to clearly support the delivery of affordable housing exception sites outside the current settlement boundary.

9.2 Through *Policy 4: Housing delivery* of the Core Strategy 2011 and *Policy DM 3.2 Meeting rural housing needs* of the Development Management Policies document (2015), the development plan for South Norfolk already includes a policy framework for determining planning applications for affordable housing exceptions schemes outside existing settlement boundaries. There is no need for the Long Stratton Neighbourhood Plan to duplicate this policy provision.

9.3 The Long Stratton NP group is not aware of rural affordable exceptions schemes for people with a local connection having been delivered in the past in Long Stratton. We understand that this is because of the size of Long Stratton; it is not recognised as a rural area. It is for this reason that the Long Stratton NP group have developed *Policy SC3: Affordable homes meeting Long Stratton needs*. The policy will apply to all schemes which deliver affordable housing, and a primary intention of this policy is to secure a proportion of the affordable housing being delivered as part of the *LNGS1: Land east, South-east and North-west of Long Stratton* for local and eligible households on a preferential basis.

9.4 Orbit have also explained the passage of time since the adoption of the Long Stratton Area Action Plan and have pointed out the implications that this has had on the delivery of affordable homes in Long Stratton. Whilst these delays are frustrating for many stakeholders including the Long Stratton residents, the NP Group have not considered it appropriate or conducive to achieving sustainable development to allocate additional development sites in the NP when there is a significant scheme already in the development pipeline. With respect to the current status of the planning application, Norfolk Homes Ltd and Norfolk Land Ltd have recently issued a press release announcing their current plans. This is attached as Appendix 1 to this response.



Examiner question:

10. Policy DC7 – “key features of the ancient countryside”: Are these specifically identified anywhere?

Response from the NP group:

10.1 The Historic Characterisation and Sensitivity Assessment published by Norfolk County Council identifies ancient features of the countryside that still exists in the Long Stratton East Sensitivity zone – see Map 1 in the Neighbourhood Plan. As set out in paragraph 5.3.9 of the Neighbourhood Plan, the County Council report refers to the following features:

- Surviving greens and cohesive settlements of timber-framed buildings grouped around them
- Church / hall complexes
- An extensive network of ancient track ways linking them together

10.2 The report is an item in the evidence library for the Greater Norwich Growth Plan. It can be accessed here:

https://www.greaternorwichgrowth.org.uk/document-search/SearchForm?Sort=Title+ASC&ViewMode=list&Subject=&hidden-Subject=&Title=&Content=&DateFrom=&DateTo=&action_doSearch=Search&start=882

10.3 The South Norfolk Place Making Guide published by South Norfolk District Council in 2012 also refers to Long Stratton’s ancient countryside. This can be accessed here:

https://www.south-norfolk.gov.uk/sites/default/files/South_Norfolk_Place-Making_Guide_SPD_0.pdf

10.4 As part of the description of Long Stratton’s key characteristics, the last bullet point on page 80 of that document reads:

Village forms part of the dispersed settlement pattern with ancient countryside surviving east of the village. This is characterised by settlements consisting of isolated farmsteads, hall/church complexes, and common-edge or roadside strings of houses forming hamlets, all linked by tracks, which survive as footpaths, lanes and roads in the current landscape.

Examiner question:

11. Policy DC8 and reasoned justification – Building for Life 12: Does the reference need to be updated (*Building for a Healthy Life*)?

Response from the NP group:

11.1 Yes. This reference to Building for Life 12 does need to be updated as it has now been replaced by Building for a Healthy Life. This will impact the policy wording and the supporting text set out in paragraph 5.3.16, 5.3.17 and 5.3. 18.

11.2 Paragraphs 5.3.17 and 5.3.18 could be replaced with text along the following lines.

Building for a Healthy Life has been written in partnership with Homes England, NHS England and NHS Improvement. It is a design code which, in 2020, updated the previously known - Building for Life 12 (a widely known and widely used design tool for creating places that are better for people and nature).



The scheme identifies 12 considerations organised across 3 themes which are of key importance when a new proposal is coming forward.

<i>Integrated Neighbourhoods</i>	<i>Distinctive Places</i>	<i>Streets for all</i>
<i>Natural Connections</i>	<i>Making the most of what's there</i>	<i>Healthy streets</i>
<i>Walking, cycling and public transport</i>	<i>A memorable character</i>	<i>Cycle and car parking</i>
<i>Facilities and services</i>	<i>Well defined streets and spaces</i>	<i>Green and blue infrastructure</i>
<i>Homes for everyone</i>	<i>Easy to find your way around</i>	<i>Back of pavement, front of home</i>

The 12-point structure and underlying principles in Building for Life 12 continue through to Building for a Healthy Life. The illustration below demonstrates the relationship between Building for Life 12 and Building for a Healthy Life. Further information on the Building for a Healthy Life assessment including how it differs from the Building for Life 12 assessment scheme is available to view at <https://www.designforhomes.org/project/building-for-life/>

<i>Building for Life 12</i>	<i>Building for a Healthy Life</i>
<i>Integrating into the Neighbourhood</i>	<i>Integrated Neighbourhoods</i>
<i>1. Connections</i>	<i>1. Natural Connections</i>
<i>2. Facilities and services</i>	<i>2. Walking, cycling and public transport</i>
<i>3. Public Transport</i>	<i>3. Facilities and services</i>
<i>4. Meeting local housing requirements</i>	<i>4. Homes for everyone</i>
<i>Creating a place</i>	<i>Distinctive Places</i>
<i>5. Character</i>	<i>5. Making the most of what's there</i>
<i>6. Working with the site and its context</i>	<i>6. A memorable character</i>
<i>7. Creating well defined streets and spaces</i>	<i>7. Well defined streets and spaces</i>
<i>8. Easy to find your way around.</i>	<i>8. Easy to find your way around.</i>
<i>Street and home</i>	<i>Streets for all</i>
<i>9. Streets for all</i>	<i>9. Healthy streets</i>
<i>10. Car parking</i>	<i>10. Cycle and car parking</i>
<i>11. Public and private spaces</i>	<i>11. Green and blue infrastructure</i>
<i>12. External storage and amenity space</i>	<i>12. Back of pavement, front of home</i>



Examiner question:

12. Policy DC9: *What is meant by “issues at individual listed buildings”?*

Response from the NP group:

12.1 The Long Stratton Conservation Area Character Appraisal highlights - see page 13 - a list of issues where attention should be focused. As set out in paragraph 5.3.23 of the Neighbourhood Plan, these relate to condition of buildings, vacant or disused buildings/sites and changes to the character of the conservation area (for example through unsympathetic use of signage). Appendix 1 to the appraisal which provides a more detailed description of the character of the conservation area also refers to issues in more detail.

12.2 The appraisal also includes (see page 15) a list of enhancement proposals in response to the identified issues. These are summarised in paragraph 5.3.24 of the Neighbourhood Plan.

12.3 Since the preparation of the Conservation Area Character Appraisal it is possible that other issues or problems have occurred relating to heritage assets in Long Stratton’s historic core.

12.4 The intention with the policy wording of the last paragraph is to establish that (where a development proposal comes forward that impacts or otherwise involves any of the applicable buildings or structures) opportunities to implement one of the recommendations set out in the Conservation Area Character Appraisal will be sought. The policy is also intended to apply should there be a new issue relating to a particular heritage asset in the historic core that has occurred.

Examiner question:

13. Policy DC10 – “an area-wide design code”: *Is there a specific title/reference/link for this design code?*

Response from the NP group:

13.1 No, the planning application submitted in 2018 by Norfolk Land Ltd and Norfolk Homes Ltd was accompanied by a 100 plus page design code called Long Stratton Design Code. The March 2021 press release by the developer (see attached) announces that amendments to the current application are due to be submitted in May 2021. It is our understanding that this will include an amended design code.

Examiner question:

14. Policy E12: *When is the requirement for a planning obligation likely to be triggered?*

Response from the NP group:

14.1 The second paragraph states this is where a development proposal is likely to generate a high number of job opportunities. Supporting paragraph 5.4.8 clarifies that proposals generating more than 250 employees will be considered as a high number. Proposals of this size which do not invest in local skills training are otherwise at risk of undermining and alienating the strength and sustainability of the local economy and workforce.



Examiner question:

15. Policy GI17 – “Where Green Infrastructure is required”: *When is this/under what provision?*

Response from the NP group:

15.1. This relates to the green infrastructure that is required as part of Local Plan provisions. Currently, this includes Policy LNGS5 in the Long Stratton Area Action Plan, together with Appendix 3 in the Area Action Plan.

Examiner question:

16. Policy GI19: *Please comment on the representations of South Norfolk Council. Is it envisaged that AAP³ Policy LNGS5 will be superseded, in part, by the provisions of the Neighbourhood Plan?*

Response from the NP group:

16.1 Policy LNGS1 in the Area Action Plan includes the delivery of a link road between the A140 and Swan Lane to be delivered but it does not set out the proposed route of this link road.

16.2 The current planning application proposes to route the link road through the wet meadow on Swan Lane. The third paragraph of Policy GI19 would therefore apply to this proposal.

16.3 The third sentence of the third paragraph in Policy GI19 states that in all cases, **development proposals** will be expected to deliver a net gain in biodiversity.

16.4 The NP group do not recognise a conflict between the policy approaches. However, we do recognise that the NP goes further by providing clarity on how proposals which impact adversely on biodiversity assets should be managed.

Examiner question:

17. Policy R20: *Does the policy need to be updated in the light of the representations of Norfolk Homes Ltd?*

Response from the NP group:

17.1 The policy wording as submitted applies. Supporting paragraph 5.6.31 does need to be updated. The second sentence would more accurately read as:

“Specifically, the NP would support the delivery of this facility on land south of Star Lane which was part of the proposal as submitted in a planning application by Norfolk Homes Ltd in 2018.”

Examiner question:

18. Policy R21: *The policy and reasoned justification are largely aspirational. Would it be appropriate for the policy to say that provision of a swimming pool “would be supported”?*

Response from the NP group:

18.1 Yes. This would be appropriate.

³ Long Stratton Area Action Plan to 2026 (adopted May 2016).

Revised Plans for Major Development and New Bypass in Long Stratton Draw Closer

Sheringham-based Developer Norfolk Homes Ltd, in conjunction with land promoters Norfolk Land Ltd, will soon submit updates to their existing planning applications for major housing and commercial development in Long Stratton, incorporating the long-awaited Long Stratton Bypass. Their aim is to receive planning permission for the exciting project by the Autumn of this year, which will pave the way for the bypass and housing delivery.

In 2018 Norfolk Homes Ltd and Norfolk Land Ltd submitted two applications to run in parallel, which together proposed 1875 houses, circa. 12.5 hectares of employment land, a 2-hectare primary school site, community facilities site and open space, together with a bypass around the town.

The applications process was paused in early 2019 pending the completion of work by Norfolk County Council in relation to a bid for Major Road Network funding to the Department for Transport, to help facilitate the delivery of the long-sought bypass.

That bid has now been submitted and the applicants (Norfolk Homes Ltd & Norfolk Land Ltd) are now in the latter stages of finalising amendments to their planning applications to reflect the revised bypass scheme (and associated infrastructure) that has been produced in conjunction with Norfolk County Council.

In addition to the updated bypass design, the revised submissions will also include amendments to the wider scheme to reflect consultations responses/discussions with both the public and other statutory consultees such as Long Stratton Town Council, Tharston Parish Council, The Lead Local Flood Authority and NCC Education Department.

The proposed amendments to the applications will include:

- General amendments to bypass design and bypass-related infrastructure (including drainage and bunding);
- The replacement of the proposed Hall Lane roundabout with an overbridge across the new bypass;
- The introduction of a dedicated pedestrian overbridge crossing the new bypass;
- The repositioning of the Rhees Green roundabout further south, on the alignment of Edges Lane;
- Revisions to development parcels/phasing/densities/landscaping, including the reorganisation/restructuring of the residential phases and the repositioning/adding of further community facilities on both sides of the development, sports pitches, open space, primary school site and surface water drainage;
- Increased circular walking/cycle routes to create a more sustainable development.

James Nicholls, Commercial Director for Norfolk Homes Ltd, on behalf of the joint applicants stated as follows:

“A huge amount of work has taken place in the background over the last 18 months and we are very excited that we are now very close to a position where we can formally submit the amendments and push forward towards hopefully gaining planning approval.

We have worked very closely with Norfolk County Council, with regard to the bypass design and the funding bid, as well as the planning team at South Norfolk Council. In this respect we are extremely grateful for the time and resources they have allocated to the applications, during what has been a difficult time for all given the global pandemic.

We really feel we are entering into the finishing straight with regard to this long sought/talked about project, which will deliver so much more than just houses, jobs, and a bypass for the people of Long Stratton and the wider community/area.

We are optimistic that we will have planning approval by the Autumn of this year, and that the project will soon become a reality.”

The proposed amendments to the applications are expected to be formally submitted to South Norfolk Council by the middle of May 2021. This will allow the formal planning process and further public consultation to begin, while providing the local town and parish councils the opportunity to consider how local Community Infrastructure Levy (CIL) Funds can be used to further enhance/shape the future of Long Stratton.

Norfolk County Council is also hoping for a decision on Government funding in respect of the bypass element in May 2021. The target date for work to start on construction is mid-2023, with the road open to traffic before the end of 2024 subject to planning approval, procurement and completion of other necessary statutory approval processes.

-ENDS-

Notes to editors

Interviews available on request via James Nicholls @ Norfolk Homes Ltd

Draft Masterplan drawing enclosed.

Further Background Info

The Long Stratton Area Action Plan, adopted by South Norfolk District Council in 2016, allocated a 140-hectare site for a mixture of housing (min 1800 houses), employment, a primary school, open space and the bypass.

More information on Norfolk County Council’s application to the Department for Transport in respect of the bypass is available at www.norfolk.gov.uk/strattonbypass