**Weston Longville Parish Council**

Response to consultation on Broadland & South Norfolk Custom and Self-Build Housing SPD

February 2025

The Weston Longville Parish Council does not object to the principal of increasing the number of self-build sites within the Broadland South Norfolk area, as a means of increasing housing stock at more affordable levels (According to the National Custom and Self Build Association (NaCSBA), you could save 20–40% in costs to build your home instead of buying one), and maintaining the viability of rural communities which might otherwise see only stagnation.

For the purpose of illustration, the parish of Weston Longville will be used as an example. A map of the parish is attached at the back. Weston Longville Parish covers 1124 hectares and has approximately 140 properties which are split into 53 in the main village, 20 in the area of Morton Lane, 20 in the area of Weston Green, 14 in the area of Rectory Rd and a further 33 spread out across the rest of the parish. The area the main village takes up is approx 5 ha which is less than 0.5% of the total parish area. There is no settlement boundary within the parish. The parish forms part of a village cluster consisting of Great Witchingham, Lenwade, Weston Longville, Attlebridge, Little Witchingham and Morton-on-the-Hill, with Great Witchingham being the service village.

At its closest point, the parish boundary of Weston Longville abutts that of Great Witchingham. At its furthest point the boundary is 4.3 km as the crow flies from Gt Witchingham, with the centre of the village being 2.6 km.

The GNLP Policy 2 SUSTAINABLE COMMUNITIES indicates that the local services available should include schools, health care, shops, recreation/ leisure/community/faith facilities and libraries. For the parish of Weston Longville there is a pub, a village hall with playing field, and a church situated in the main village, and a Buddhist centre on the edge of the parish. The neighbouring service village of Gt Witchingham provides a selection of small shops, a school serving children of the ages 4-11 and a branch doctor’s surgury. For senior schools, libraries, leisure centres and supermarkets it is necessary to travel outside the village cluster.

Since Weston Longville is without a settlement boundary, the Parish Council has largely centred it comments on the section of the SPD which deals with this.

**Comment 1**

*Section 8.19*

*POLICY 7.5 – SELF-BUILD AND CUSTOM BUILD WINDFALL HOUSING DEVELOPMENT OUTSIDE DEFINED SETTLEMENT BOUNDARIES*

*(NB development within settlement boundaries is covered under Policy 7.4)*

*Small-scale residential development of up to 3 dwellings for self-build and custom build homes for people who meet the eligibility criteria for Part 1 of the relevant district's self-build register will be permitted:*

*On sites that are within or adjacent to settlements with a defined settlement boundary; and*

*On sites within or adjacent to other settlements without a defined settlement boundary*

*To prevent incremental sprawl, for the operation of this policy such development will not be considered to have extended the defined settlement boundary, or where there is no boundary, the built form of the settlement.*

*For all development covered by this policy the scheme will need to respect the form and character of the settlement including:*

* *Housing density is reflective of the density in the settlement and surrounding built-up area; and*
* *The ratio of the building footprint to the plot area is consistent with existing properties nearby which characterise the settlement; and*
* *The proposal would result in no significant adverse impact on the landscape and natural environment; and*
* *The proposal accords with other relevant local plan policies.*

*When considered cumulatively with other development, the scheme should not result in a level of development in any settlement that would be contrary to the Sustainable Growth Strategy outlined in policy 1.*

*8.20 Essentially Policy 7.5 is a permissive policy that applies to all parishes in the Greater Norwich area. Its purpose is to allow for a limited number of additional dwellings (sites of up to 3) for small scale self-build and custom build in each parish beyond those allocated or allowed for as larger scale windfall sites through other policies in the GNLP. These sites can be within or adjacent to settlements with or without settlement boundaries.*

*8.26 Policy 7.5 has a wide remit, and the first part of the policy allows for schemes to come forward in and adjacent to both settlements with a defined settlement boundary and settlements without a defined settlement boundary. This gives flexibility and scope for residential development in areas where housing would otherwise not be allowed but as already mentioned this should not be seen as an opportunity to build anything anywhere.*

Whilst it is appreciated that the policy seeks to prevent greenfield development by placing an emphasis on keeping building within the existing built area, and given that the amount of development is limited to a maximum of 3 plots per parish until 2038, then consideration should be given to the built areas with a whole parish and not just to tiny area within a large parish.

**Comment 2**

*8.30 In relation to sites in settlements without a defined settlement boundary the key question is what constitutes a settlement for the purposes of the policy? It is difficult to define as every place is different and in reality each scheme will need to be considered on its merits as there is no one size fits all approach that can be used. The consideration of other policies in the GNLP and reference to the NPPF approach to sustainable development in rural areas helps to narrow down the definition of a settlement without a settlement boundary for the purposes of this policy and to help give guidance to applicants.*

*8.31 Paragraph 84 of the NPPF states that planning policies and decisions should avoid the development of isolated homes in the countryside unless particular circumstances apply. This view is consistent with the rationale set out for the main modification to Policy 7.5 as explained in paragraphs 82 - 84 of the Inspectors' report on the examination of the GNLP. The GNLP Inspector particularly did not like the use of 'recognisable groups of dwellings' in the submission version of Policy 7.5. He said that this would permit new housing development in remote locations that do not constitute a settlement contrary to national planning policy which seeks to promote sustainable development in rural areas and avoid the development of isolated homes in the countryside. Paragraph 84 of the Inspectors report modifies the wording of Policy 7.5 to apply solely to settlements rather than 'recognisable groups of dwellings' thereby making a clear distinction between the two. Therefore, it is considered that to be a settlement without a defined settlement boundary it must be demonstrated that a location is more than a recognisable group of dwellings.*

*8.32 Following on from this paragraph 83 of the NPPF states that* ***'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'****. The Oxford English Dictionary defines vitality as 'Active force or power; mental or physical vigour; activity, animation, liveliness'. This suggests that a settlement (whether or not it has a settlement boundary) needs to be more than simply a collection of houses, to be sustainable it should be somewhere that can demonstrate vitality through a sense of community value and identity as well as supporting local services and facilities.*

The criteria for assessing whether a group of houses is a settlement are far too subjective. The outcome is based on the individual perceptions or interpretations and experiences of the officer, which can vary from person to person. Officers will require a far more in depth knowledge of the local area than is usually required to determine an application. There is no indication as to how an officer will be able to establish either how vital a community is, nor how it maintains that vitality.

In small, rural communities, it is impossible for any one area to thrive and be vital without the support of the other local areas – the pub and village hall may be located in one place but they cannot be sustained without the support of those living outside the immediate proximity. Using Weston Longville as an example, the Parish Council is made up of one councillor who lives within the village, and then two from the Morton Lane grouping, two from Rectory Rd and two from Weston Green – the spread of which means that a whole parish view on decisions can better be taken, as is required under the National Association of Local Councils Good Councillors Guide. The legal framework of the Parish Council’s recognises that a community is greater than just a small area of adjacent houses. The village hall is already a combined enterprise from 3 communities – Weston Longville, Morton on the Hill and Attlebridge. Of the 12 trustees, 6 come from Weston Longville but those 6 are split into 1 from the village centre, 1 from Morton Lane, 1 from ectory Rd and 3 from Weston Green. This again shows that it takes a large scale community to make such enterprises function, and it is not possible to focus ‘the vitality of rural communities’ into a very narrow area.

**Comment 3**

*8.33 One of the key priorities of the GNLP is the delivery of inclusive growth and sustainable development. In terms of accessibility to services and facilities the first requirement of GNLP Policy 2 states:* ***'ensure safe and convenient access for all, including by non-car modes, to on-site and local services and facilities such as schools, health care, shops, recreation/leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it dominating the streetscape or being a hazard'.***

*8.34 The principles of building sustainable communities as set out in GNLP Policy 2 also apply to self-build development as made clear in paragraph 398 of the GNLP supporting text to Policy 7.5 which states that* ***'Additional requirements applying to all sites such as providing safe highways access set in policy 2 will be applied to these sites, though with greater flexibility in relation to access to services due to the very limited scale of development supported by the policy'****.*

*8.35 By its nature a settlement without a defined settlement boundary is likely to have a lower level of services and facilities and less good accessibility compared to those with a defined boundary. Paragraph 398 of the GNLP states that greater flexibility will be applied in relation to access to services when assessing a site under Policy 7.5, but it does not state that access to services should be completely disregarded. Therefore, to facilitate sustainable development it is considered reasonable to assume that a settlement without a defined settlement boundary under Policy 7.5 should be able to demonstrate a proportionate level of safe accessibility to commonly used day-to-day services and facilities (as listed in Policy 2), either in the settlement in question or within a reasonable safe distance in a nearby settlement. Sites which have no reasonable safe access to services and facilities are unlikely to be considered acceptable under this part of the policy.*

In rural Norfolk, with its poor infrastructure of roads and public rights of way, and lack of public transport, accessing any form of services without a car is almost impossible. This means that a great many villages in the village cluster model will have no reasonable safe access to any facilities or services. Simple table top examinations will not give a true reflection of the volumes of traffic and road safety on the ground, and the extent to which people can walk / cycle to places is extremely variable. This again means a high level of subjectivity is required by the officers making the determination.

**Comment 4**

Policy 7 of the GNLP – Strategy for the Areas of Growth, section 166, point d states

d. *Focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy. The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by* ***promoting appropriate growth in smaller villages****. It will support local services, whilst at the same time protecting the character of the villages*

Unless some growth is allowed to be spread over more than just the service villages, then the additional 3883 homes targeted for village clusters by 2038 cannot be met. Having a more broadminded view on the definition of a ‘settlement’ will facilitate this.

**Comment 5**

*8.24 Early appeal decisions that mention Policy 7.5 stress the importance of having a mechanism in place to ensure delivery of custom and self-build dwellings. For applications coming forward under Policy 7.5 conditions or S106 agreements will be needed to ensure that the properties are constructed and occupied as self-build/custom build dwellings.*

The Parish Council id supportive of the principal that the self-builders are constrained to live in the property for a set number of years – we would suggest a minimum of 5, but there should be caveats which protect the builders from exceptional changes in their circumstances such as bankruptcy, family breakdown etc.

**Comment 6**

*8.25 There is no requirement to be on the self-build register in order to apply for planning permission under Policy 7.5 but as stated in the policy people wanting to build under Policy 7.5 will need to be eligible for entry onto Part 1 of the relevant Councils register. For more information about the eligibility criteria for Part 1 see section 5 above. For any planning application submitted under Policy 7.5 the Council will ask if the occupier is on the relevant Self-Build register and if not will require them to provide information to demonstrate that they meet the Part 1 Eligibility Criteria. The Council reserve the right to check the information provided and the applicant should be aware that their declaration of eligibility will be open to public scrutiny as part of their planning application subject to GDPR considerations. If an application is initially submitted in outline and the end occupier is not known then conditions will be applied to the grant of permission and detailed information about the end occupier will need to be presented at the reserved matters stage so that eligibility for Part 1 of the register can be checked.*

The Parish Council is supportive of the principal that plots are made available from landowners via the outline planning permission system but then construction is completed by those on the self-builders register.

