

Wells Town Council

Full Council Meeting February 7th. 2022

North Norfolk District Council Local Plan Proposed Submission Version Jan.2022

Report of the Wells Town Council Neighbourhood Plan Working Party

The first version of the plan was produced in 2019 and was the subject of comment by the Council's Neighbourhood Plan Working Party which now presents its observations on the revised plan for the assistance of the Council. The observations are made in the light of the Joint Holkham/WTC Housing Needs Assessment 2021, the Working Party's own deliberations and the Public Consultation of October 1st. and 2nd 2021.

The Local Plan covers a wide range of issues of concern to the town including housing, employment, the environment, health and wellbeing, and infrastructure.

The revised version of the Plan differs from the earlier version only in small respects but some of these are important to the town. Its overall remit is to deliver 'sustainable development' to take account particular pressures related to employment, population growth and health concerns on the one hand and the need to ensure that development does not occur at the expense of such as environmental assets.

A Small Growth Town

It describes Wells as a **Small Growth Town**, one which has a limited range of services – shops, health services, schools, and a range of employment opportunities. **4.1.4** (References are to the Report paragraphs). Within the **Settlement Boundary** of the town development is permitted. Outside it, described as the **Countryside Policy Area** development is to be severely limited. **Policy SS1**

One exception is **Community-Led Development 4.3/SS3** These are developments proposed by such as Neighbourhood Plans and Community Land Trusts such as Homes for Wells 'to promote additional development in an area beyond that which is proposed in this Plan or to add locally distinctive policies which complement and support...the Local Plan **4.3.3**. There are a number of conditions including the need to demonstrate community support. In relation to housing "it should be for affordable or key worker accommodation. A small element of open market housing on the site will only be acceptable where it is clearly demonstrated to be the minimum necessary to deliver affordable dwellings...."

The second exception is the provision for **Rural Exceptions Sites** (See below)

Health, Infrastructure and community facilities –Section 5

This is intended to ensure that where there are developments adequate provision is made for any necessary additional health care provision, open space retention and addition, schools, transport networks and community facilities. It includes reference to affordable housing (see below), developer contributions to the provision of infrastructure/community facilities (s.106 agreements), broadband provision and parking.

It notes the need for housing to have adequate **off-street parking**, for electric vehicle charging facilities, the retention of public car parks. See also **6.8.28**

A small additional area of green space in Wells is added in the first version and is retained in the current revision, to lie between Holkham Road and the proposed Mill road housing development (see Housing infra).

[Comment:

1) The Plan states that 'The town is a very popular tourist and visitor destination and for an increasingly lengthy period of the year can suffer from traffic congestion and lack of sufficient

parking.’ **2.1.7.** In section 17 it is said that ‘Due to the remote rural location, and the limited public transport available many visitors arrive by car. **17.0.2**

2) There is no mention of the considerable problems experienced by the town during the summer months but also at weekends throughout the year from the inflow of traffic from east, west and south, which frequently results in gridlock along arterial entrances to the town, visitor parking in residential streets, often illegally and at much inconvenience to residents, and danger from the potential inability of emergency vehicles to gain access as well blocking bus routes.

3) There is almost no mention of the road network as part of the infrastructure. Consideration needs to be given to traffic flows into Wells via the A149 and the B1105 and the impact of the proposed road improvements around Fakenham. We recommend that a traffic survey be undertaken prior to the provision of a policy which deals with the increasing traffic demands and the other policies relating to the town.

4) In particular, the existing off-street car parks both public and private are inadequate to the task. References to infrastructure deal with the effect of additional housing but not of the severe wider problems arising from tourism. Nor is there any engagement with the Natural England report which recommended a reduction in the amount of off-street parking. NCA Profile: 77 North Norfolk Coast 2013]

Environment – section 6

The coastal part of the District as well as the Broads lie in an Area of Outstanding Natural Beauty (AONB) requiring a high degree of protection. “ Sites that are suitable for housing outside Local Plan allocations should be developed to meet local affordable and other locally identified housing needs.”

6.1.4. The exceptional circumstances in which development would be allowed include the effects positive and negative on the local economy, the environment, recreational opportunities and relevance to the economic, social and environmental wellbeing of the area. **6.1.7.** Issues raised include the effect of artificial lighting, noise, flumes and dust; privacy and overshadowing, protection of the historic environment.

Issues relating to climate change and coastal flooding are dealt with in connection with the Shoreline Management Plan of 2014 which proposed Hold the Line or Coastal Erosion Risk policies. **3.5.8**

[Comment: The Shoreline Management Plan proposed that Wells should be a Hold-the-Line settlement. Cromer and Sheringham are mentioned as in need of consideration in this regard. Wells should also be considered as being at even greater flood risk than either of the above. Mention in 17.0.9 is of ‘residual risk should defences fail’ but not of substantial risk to the quay and east end.]

Housing – section 7

Extra housing provision is mentioned in relation to inward migration caused by those wishing to retire (and elsewhere by the increase in working from home) resulting in an increase in the age profile of the coast **2.1.25.**

The revised plan proposes the same sites for development as in the previous edition: **Market Lane** strip (20 houses) and **Holkham Road** (50 Homes) including 25 affordable homes and associated areas of public open space. As a Small Growth Town the plan provides for an overall figure for the period 2016-2036 of 196 houses of which 89 have been completed, 37 with planning permission and the remainder, 70, being proposed in the land. Policy HOU 1

The overall **minimum figure** for the District is 9,600 with a minimum of 2,000 affordable dwellings. If this is not provided during the plan period, there will be a presumption in favour of sustainable development proposals. This is a slightly lower figure than that proposed in 2019 see **7.1.4**

Second homes are mentioned as representing 8-10% of housing in the District with the comment that in some remote villages this rises to 38%. Such are not therefore available for local accommodation needs. **2.1.26/7.1.1.** (see Comment)

Affordable homes for purchase or part purchase are mentioned, where it is said that “it is essential that they are made available at a price which allows those on lower incomes in the District to access the local housing market at an affordable level”. **7.2.4**

As before, building outside the Settlement Boundary affordable homes can be permitted under the principle of **Rural Exceptions Housing** providing that there is proven local housing need for affordable housing demonstrated by up-to-date evidence, that it is adjacent to a settlement, that it is made available solely to people in local housing need, that it is of a scale and design appropriate to its immediate surroundings and any market housing is at a minimum (**HOU3** p. 120 and see below).

The section on **extensions and replacement dwellings** and emphasises the need for high quality building and cautions against replacement dwellings (rather than the repair and improvement of existing buildings on the basis of suitability and undesirable **energy use**).

Housing densities of 30 houses per hectare is the starting point for villages ‘consistent with protecting the character of the area’. **9.2.4** Housing should be of mixed sizes and tenures.

The Plan reports Anglian Water’s assurance that off-site **mains water** reinforcement will be required and that some enhancement to the **foul sewerage** network capacity will be required **17.0.9**

[Comments: 1) The first area, Market Lane, which is adjacent to the recently developed Homepiece site, was originally proposed for exceptions housing (see below) but with the enlargement of the Settlement Boundary is now proposed for market housing with a proportion of affordable housing. Some clear and specific justification seems necessary for this change of policy especially given the repeated emphasis on affordable housing to meet local need. The effect is to reduce the number of affordable homes for rent from 20 to 7.

2) Concerns have been expressed as to the desirability of the Holkham Road site, which is highly visible from the north, extends the settlement boundary into the countryside without clear specific justification and whose impact on the farm would be massive.

3) There exists no adequate definition of affordable housing. Given the average price of housing in Wells (£415,000 HNA 2020; £470,000 ONS 2022) and the average wage (£38,550 HNA) affordable housing for sale is an illusion. HNA contends that a household with an average income could afford to buy a house for £180,000. No houses for sale at or near that price exist in Wells. The unique condition of the town as a substantial coastal settlement with good access from the south and good facilities on which housing pressure from incomers is at a very high level demands more detailed consideration and provision. Para 7.2.4 above is completely inapplicable to Wells.

4) The Restriction to principal residence of new houses for sale which was heavily endorsed in the Neighbourhood Plan consultation, finds little mention in the revised plan (only where buildings lost through coastal erosion are replaced). Community-led housing developments on the other hand are approved. It would be important to know what the effect

would be on house prices in the town, which already far exceed the capacity of local pockets and how it would affect the viability of affordable housing projects.

5) The reference to settlements where the percentage of second homes exceeds a third of the stock ignores the similar percentages in Wells which is much larger than, Salthouse (mentioned as an example) where the effect is massive by comparison. Para 2.1.26 is an inadequate description and needs a complete rewrite.

6) A rural exception site seems, given the conditions under which it would be permitted, to meet the stated desires and needs of the local community. The lower part of the West End paddock might fulfil those requirements.

Employment, -Section 8

No new allocations of **employment land** are proposed **E 1**. Comment is made on Egmore Business Zone over which there are Permitted Development Rights **8.2.3**

Large **retail development** in the town is discouraged partly because of matters of scale but also because it may encourage unnecessary car journeys. **8.4.4** It envisages the growth in retail outlets of 191 sq. metres over the period to meet the needs of local residents, the local hinterland and tourists. **E4**

[Comment The impact of heavy lorries on the condition of the B1105 and generally of traffic management needs to be considered – see also Comment 3 on Section 5.]

Having examined the Submission Version of the Plan the Working Party recommends that the Council make representations to the District Council to the effect that the Plan as revised does not sufficiently address the unique condition of Wells or its needs: in particular that –

- its housing needs compared with existing and planned provision were not unjustly described as ‘a perfect storm’ by the HNA 2021 report. The disparity between income and house price and the lack of needed housing provision is a matter for urgent consideration;
- its accessibility by road almost directly from the south east of England and the lack of proper traffic management including off-street parking clearly contributes to its very serious traffic problems
- as detailed in the comments sections above.

The Working Party proposes that professional assistance from one of our consultants be obtained in the making of these representations.

There are other concerns, some of long standing, including the lack of adequate employment opportunities and climate change mitigation but these above need to be addressed by the plan in a much more serious way.

RA 31st. January 2022

Addendum – extracts from the Plan

2.1.7 Wells-next-the-Sea (2011 Census population 2,165) with its working harbour, salt-marshes and wide beaches, is an attractive town and important tourist destination. The town also acts as a local service centre. The recent addition of a small supermarket and petrol filling station has strengthened this role, but its remote location, in addition to the high price of housing, has created problems in terms of providing affordable housing for local people, including essential key workers. The town is a very popular tourist and visitor destination and for an increasingly lengthy period of the year can suffer from traffic congestion and lack of sufficient parking. The entire town and the surrounding landscape are within the Norfolk Coast Area of Outstanding Natural Beauty.

2.1.20 Whilst the coastal area plays a major role in creating North Norfolk's distinctive environment and is important to the economy through tourism, it also presents two significant challenges. The first emanates from the fact that North Norfolk's cliffed coastline between Kelling Hard (near Weybourne) and Cart Gap (near Happisburgh), which is made of soft glacial deposits, has been eroding since the last Ice Age. The second concerns the low-lying coastline either side of the cliffs, which is at risk from tidal flooding.

2.1.22 The risk of **flooding** in North Norfolk is not widespread and comes predominantly from a combination of tidal and fluvial sources. Tidal and coastal flooding are the most significant, as the District is bounded to the north and east by the North Sea and many of its watercourses are tidally influenced, with rivers such as the Glaven, Stiffkey and Bure being affected by tidal locking at high tides. Flooding can also occur due to fluvial risks associated with rivers. Collectively a number of growth settlements are at risk from localised fluvial flooding including parts of Fakenham, Wells-next –the- Sea, Hoveton, Mundesley, Horning, Sea Palling and Potter Heigham. Sources of flooding are not, however, just fluvial and tidal. Flood risk is also due to surface water runoff and groundwater sources, due to rock strata and springs, culverts, and potentially, the overloading of drainage and sewer infrastructure. Heavy rain and areas of low lying land and poorly maintained culverts can exacerbate flood events. Climate change, is predicted to result in sea level rise, increased coastal erosion and result in more increased short-duration, high intensity rainfall which will have the potential to compound flood events and

2.1.23 The varied landscape and geology of North Norfolk has led to the development of local architectural styles and traditions such as flint, pantiles and thatch roofs, which are still prevalent today. The quality and distinctive character of the **built environment** derived from these architectural styles and traditions is particularly apparent in the areas' town centres, small villages and older farm buildings; and has been recognised in the large number of Listed Buildings (2265) and Conservation Area designations (81).

2.1.24 As well as underpinning a strong and diverse tourism industry, North Norfolk's attractive and distinctive coastal and rural environments have proved **popular retirement locations**. The 2011 Census showed that 58% of the population were over 45, compared to 43% in the Eastern Region as a whole and 41% nationally. From the 2018-based sub-national population projections, it is projected that by 2036, the 45+ age group will have increased to 65% in North Norfolk; in comparison to 50% in the Eastern Region and 47% nationally. By 2036 it is projected that nearly 40% of the population of North Norfolk will be over 65 years of age.

2.1.25 The population of the District is ageing and retirement has been a major cause of the net inward migration which has fuelled population growth in the area over the last thirty years or so (in spite of the fact that deaths have exceeded births in the area during this period). This attractiveness to retired "incomers" is an economic resource that supports a range of local services, businesses and rural communities, but also raises challenges for housing, health care and provision of services.

2.1.26 There are 55,416 dwellings across North Norfolk (Council tax records 2020). Approximately 8.1% are not recorded as a principle residence and are registered as **second homes** for Council Tax purposes (2020). The percentage varies across the District with higher concentrations in the coastal communities on the North Norfolk Coast where in some of the more rural and remote villages this rises to 38% (Salhouse). Some coastal communities also have a high concentration of **holiday accommodation**, such as caravan parks and chalets, which contribute significantly to the local community and tourism industry of the District.

2.1.27 Median **house prices** at £250,000 across the district have more than doubled in the past 20 years and new houses remain less affordable across the District, with house prices on average 9.07 times that of median wages (ONS 2020)(9). This is a slight improvement on 2019 where the ratio was 9.87 but is still higher than the 8.68 at the start of the Plan period in 2016. As a result, access to the private home ownership market is constrained and a high demand for affordable rented properties persists.

2.1.28 Although overall the area appears affluent, there are pockets of **social deprivation**. Unemployment within the area is low, as are rates of economic activity due to the high numbers of retired residents. Rates of pay in North Norfolk have increased in 2020, from £19,055 in 2019, to risk.

2.1.31 The **economy** of North Norfolk remains fairly narrowly based with a relatively high dependence upon employment in the agriculture, retail, public services and tourism sectors. The local economy is particularly characterised by the fact that the majority of employees (84%) work in small businesses. Whilst there has been a change in the business base of the manufacturing sector with business closures / rationalisations in the food processing and engineering sectors in recent years, there has been a growth in employment in the manufacture of plastic and timber products and marine engineering / boat-building, which continue to perform strongly.

2.1.32 Today, significant numbers of employees in the District are engaged in the provision of education, health and social care, public administration, retailing and tourism. In recent years the **tourism** sector has enjoyed growth through investment in quality accommodation and attractions, and a move to year-round operations capturing short breaks and specialist markets, in addition to the traditional summer holiday.

2.1.33 Whilst most of North Norfolk's towns have small industrial estates, the main concentration of manufacturing employment is in Fakenham and North Walsham. Cromer, Mundesley, Sheringham and Wells-next-the-Sea are **traditional destination resorts**, and Hoveton acts as an important centre for Broads-based tourism.

2.1.34 The District is one of the most rural in lowland England with the larger settlements distributed more or less evenly across the district and accommodating around half the population, the other half live in dispersed villages and hamlets throughout the rural area. Coupled with the character and historical nature of much of the housing stock, North Norfolk's **greenhouse gas** emissions

are dominated by the transport sector with road, (18.7%) and rail transport (5.7%) combined accounting for approximately 24.4% of CO2 emissions in the District (the most prominent greenhouse gas). This is closely followed by emissions from the residential sector which account for 23.1%(12).

2.2.9 Throughout the last two decades, there has been **strong demand for new homes** in the District. This has mainly arisen as a consequence of inward migration particularly by **those seeking to retire** to the area. In 2002 the Median house price in the District was £105,000 with a property to earnings ratio of 6.2. By 2020 this had increased to £250,000 and a ratio of 9.7, which shows that households will now need almost ten times their income to purchase a starter home in much of the District and in the coastal areas in the west of the area this multiplier is much higher. In some areas, particularly in the smaller villages there is a concern that young people are unable to afford to buy a home, leading to a population imbalance skewed towards those retired and elderly people, and an inability to attract young to middle aged key workers. There is a concern that some services such as rural primary schools will become increasingly less viable.

2.2.10 Between 2016 and 2036 the population of North Norfolk is forecast to grow by around 11,000 people (103,587 - 114,850). This represents an 11% increase and to accommodate this increase in population, address the changing needs of those who already live here, and to make a meaningful contribution towards providing an increased supply of **affordable homes**. It is projected that a further 10,000 - 11,000 new homes will need to be provided in order to achieve this. As well as growing, the population will continue to age and by the end of the plan period in 2036 around 40% of the population will be over 65 years of age. Meeting the housing requirement, not only in terms of numbers, but also in terms of types (affordable and elderly person's accommodation), represents a significant challenge. The fastest growing cohort of population is the over 80s.

2.2.11 Around 8% of the homes in the District are used as **second homes**, and 1% of homes in the District are currently recorded as long term vacant - a reduction from 3% in 2018. In some communities particularly in the west of the District the proportion of **second and holiday homes** is between 20 and 40%, partly due to the large areas of purpose built holiday homes and chalet parks in some areas.

2.2.12 Meeting the **housing requirement**, not only in terms of numbers, but also in terms of types (affordable and elderly person's accommodation), represents a significant challenge.

2.2.13 The economy of North Norfolk is dominated by tourism and the service sector and has seen a decline in jobs in manufacturing and agricultural employment in recent years. It is mainly a **low-wage economy** dominated by small businesses. Parts of the District are strongly influenced by the close proximity of Norwich with its wider range of jobs and strong retail offer and the closure of defence establishments at Coltishall, Neatishead, Sculthorpe and West Raynham has also drawn jobs away from the area, with limited subsequent investment. The recent completion of the Norwich Northern Distributor Road (NDR) may open new opportunities for business growth by improving access to local markets and the wider economy.

2.2.14 Given its peripheral location and extensive coastline, the economic prosperity of North Norfolk is irrevocably linked to the success of its **tourism sector** (although E-commerce may present opportunities to overcome problems of peripherality). A recent tourism study of North Norfolk noted that the area has one of the most distinctive and diverse tourism offers in the East of England, with the main appeal being its unique environmental assets 'of coastline and beaches, the Broads and inland areas of countryside, which 'therefore represent the core foundation for the future development of tourism within North Norfolk'. Tourism is vital to North Norfolk's economy; in 2017, accounting for 28.4% of all employment, 8,827,700 trips were made to the District (day and staying), accounting for a total tourism value of £505,109,250. This increased in 2019, when 9,919,200 trips were made to the District (day and staying), accounting for a total tourism value of £528,931,378. Tourism currently accounts for 30% of all employment(15).

2. 2.15 The provision of a higher number of jobs, of better quality and value, reducing the need to travel elsewhere for employment, addressing the consequences of a shrinking workforce, and providing for the growing needs in health and social care are all significant challenges

4.1.4 The Small Growth Towns have more limited services but nevertheless a comprehensive range. They each contain a public secondary school (with the exception of Holt), at least one large convenience store, a reasonable selection of comparison shops, health services and a range of local employment opportunities. Whilst their service role is more limited compared to the Large Growth Towns they nevertheless meet most of the day to day needs of residents within the towns and adjoining catchment areas.

4.3. 1 Giving communities greater say in and control of development in their areas is a central theme of government policy. **Community-led schemes** are those that are proposed by local communities, rather than by local authorities or private developers. They can help communities to tackle local issues that are important to them such as a shortage of affordable homes, key worker accommodation, or the provision of local jobs, and can generate income to help fund further investment in the local area. Such schemes can bring communities together and deliver increased investment for the benefit of all.

4.3.2 Mechanisms for delivering community-led developments include **Community Land Trusts (CLTs)**, the preparation of Neighbourhood Plans, or simply making a planning application for community developments. CLTs are not-for-profit organisations based in, and run by, the community that seek to develop key community assets. The usual starting point for CLTs is the provision of affordable housing but other benefits such as community shops, pubs, allotments, gardens, play areas, orchards, work space, and renewable energy can also be provided via this mechanism.

4.3.3 Neighbourhood Plans are separate Development Plan documents which are prepared by a designated community group (usually a Parish or Town Council) and can be used as a way to promote additional development in an area beyond that which is proposed in this Plan or to add locally distinctive policies which complement and support the delivery of the strategic policies of a Local Plan. North Norfolk District Council is supportive of the preparation of Neighbourhood Plans(59).

7.1.4 The current standard national methodology is based on Office for National Statistics (ONS) projections with a 2014 start date. The Authority does not consider that these 2014 based projections accurately reflect likely future growth rates in the District because they project forward higher rates of annual growth than were subsequently shown to have actually occurred. The Office of National Statistics published revised projections with a base date of 2016 and the Council considers these to be a more robust basis for establishing the future requirement for homes in the District(91). Applying the national standard housing needs methodology to the 2016 projections, and using the latest available (2020) affordability ratio for the District, produces a minimum housing requirement for around 480 dwellings per year, or **9,600 new homes** in the twenty years covered by the Plan. This Plan sets this figure as the minimum target to be provided. As a measure to extend choice and flexibility, the Plan includes specific allocations and policies which would enable the delivery of around 12,000 new homes.

7.1.5 Delivering sufficient homes means addressing a wide range of housing needs including for those who are unable to afford local homes and those who require specialist types of accommodation. The evidence indicates that there is a need for around **2,000 affordable homes** and an existing and rising need for various types of elderly person's accommodation. This Plan includes proposals and policies designed to help address these particular needs including those of the gypsy and travelling community and those wishing to build their own homes. Where policies require a mix of homes the Council will require these to be provided in stages as the

development progresses to ensure provision on the site in a timely and integrated way.

7.1.7 On the date that the Plan is adopted, part of the required housing target over the Plan period 2016-2036 will already have been built. A further quantity will have planning permission but will not have been built, and over the remainder of the period the Council would also expect a proportion of the required growth to be delivered via windfall developments. These **windfall developments** comprise small-scale infills, redevelopments, re-use of existing buildings and affordable dwellings in the designated Countryside Policy Area. For many years these sources of new homes have collectively delivered a significant proportion of the total homes in the District and the policies of this Plan will allow this to continue and increase the opportunities for such developments. There is no evidence to suggest that this source of new homes will significantly diminish in the future. Even so, in preparing this Plan the Council has been realistic and has reduced its expectations in relation to future windfall housing to a figure which equates to around 50% of the historic rate and has carefully assessed the likely future supply of development derived in this way. The remainder of the Plan housing target is provided for through the suggested site allocations in this Plan, which are expected to deliver approximately 4,900 homes (inclusive of elderly persons accommodation but excluding 400 units in Small Growth Villages).

Policy HOU 1 p.113

Delivering Sufficient Homes

1. The Council will aim to deliver a minimum of 9,600 new homes over the plan period 2016-2036.

As part of this total a minimum of 2,000 affordable dwellings will be provided. To achieve this specific development sites suitable for not less than 4,900 new dwellings are allocated.

2. Development will be permitted in accordance with the adopted settlement hierarchy and the table below. If during the plan period the Council is unable to demonstrate a Five Year Land Supply it will apply a presumption in favour of sustainable development to proposals.

Wells-next-the-Sea 37 with planning permission, 89 completed, 70 to be provided = 190

7.2.4 The evidence indicates a high level of **need for smaller social rented properties** and this is reflected in the policy. Where affordable homes for purchase, or part purchase, are provided as part of the mix it is essential that these are made available at a price which allows those on lower incomes in the District to access the local housing market at an affordable level.

7.2.5 The policy sets a general requirement for **on-site affordable housing provision** of between 15% and 35% on sites of qualifying size determined by site location within two defined Affordable Housing Zones. These are based on local evidence reflecting the viability of delivering housing in the respective parts of the District and the high level of affordable housing need throughout the area. The Council will seek to deliver the highest proportion of affordable homes that is viable and save for very exceptional circumstances will require on site provision at the proportions required by the policy.

7.2.6 The NPPF indicates that affordable homes should not normally be required on schemes of ten or fewer dwellings save for in Designated Rural Areas where, if the evidence supports it, a lower site size threshold can be applied. Much of North Norfolk is designated as a Rural Area and in light of the high need for affordable homes the Council will seek affordable housing on schemes in this area which propose six or more dwellings. To address the possible practical problems of providing affordable homes on small sites the policy includes an option to make an equivalent financial contribution of sufficient value to deliver the affordable homes requirement elsewhere.

7.3

The purpose of this policy is to provide for the delivery of an increased supply of **affordable homes in locations close to where the need for such accommodation arises**.

7.3.1 The delivery of affordable homes is a key priority for the Council. In the last decade the provision of affordable dwellings in the designated Countryside Policy Area has provided a significant proportion of all affordable homes built in the District. These homes, referred to as **Rural Exceptions**, are granted planning permission as an exception to normally restrictive planning policies and are designed to be relatively small in scale in order to address locally arising needs in the area. Occupation of the dwellings provided via this policy is limited to those in need who have a strong connection to the 'hosting' village and the surrounding parishes in line with the Council's Housing Allocations policy.

7.3.2 In recent year's public funding for affordable housing provision has been reducing and the NPPF now allows for some market homes to be included within these schemes provided the value of the market homes is used to fund the delivery of additional affordable homes. Where it is clearly shown that the inclusion of market homes on a rural exception scheme is necessary to deliver affordable dwellings which would not otherwise be built, the Council will consider whether allowing a **limited amount of market housing** would be appropriate, taking into account the location of the site, the degree of need for affordable housing in the area, and any excessive development costs associated with the develop. In such cases, clear evidence of viability will need to be provided demonstrating that there are excessive development costs due to site constraints, and that any additional revenue created by the inclusion of open market housing is essential to the delivery of the affordable housing proposed. The Council will only support the inclusion of the minimum number of market homes to make a rural exception scheme deliverable. The additional value created by the inclusion of market housing should not be reflected in the price paid for land.

HOU 3 (Rural Exceptions Housing)

Proposals for affordable housing development within the designated Countryside Policy Area will be permitted where they comply with all of the following criteria:

- a. the proposal would help to address a proven local housing need for affordable housing as demonstrated in up to date evidence;
- b. the site is physically well related to a built up part of a settlement and the facilities it provides;
- c. the affordable housing provided is made available solely to people in local housing need at an affordable cost for the life of the property (the Council will ensure that any planning permission granted is subject to appropriate conditions and/or planning obligations to secure its affordability in perpetuity);
- d. the scheme is of a scale and design appropriate to its immediate surroundings and is sympathetic to the local area; and,
- e. where market housing is included within proposals it is clearly demonstrated to be minimum necessary in order to deliver affordable dwellings which would not otherwise be provided, and in all cases the majority of the homes provided are affordable.

For the purposes of this policy 'local housing need' means the need in the Parish and adjoining Parishes as evidenced by the most up-to-date evidence.

9.2.4 In establishing the capacity for homes on each site a density of approximately **30 (villages) or 40(towns) dwellings per hectare** has been used as a starting point. Allowance has been made to ensure each site can deliver the range of uses required, and where it is considered that sites may not be suitable for this density of development, perhaps because of **local character considerations**, an adjustment has been made. The Council will expect development proposals to make efficient use of developable land with the aim of accommodating the maximum amount of development that is consistent with protecting the character of the area and in ways that comply with the policies of this Plan. Dwelling numbers included in the policies are expressed

as approximates, do not include any allowance for specialist elderly care units required by Policy HOU 2 'Delivering the Right Mix of Homes', and should not be taken to mean that the number of dwellings indicated will always be acceptable. How many dwellings can be accommodated in a satisfactory way on any given site will be determined at planning application stage based on the merits of individual proposals and how they comply with the policies of this plan.

9.2.5 Each of the site allocation policies identifies a **minimum quantity of open space** to be provided on the site. This is derived by applying an open space calculator to the remaining developable area after deducting land required for other uses and assumes the site will be developed at a density of either 30 or 40 units per hectare with a mix of dwellings which accords with Policy HOU2. As with dwelling numbers the precise quantum of open space provided will be determined at planning application stage taking account of the specifics of the development proposal. Applicants should assume that at least the stated minimum will be required and should discuss proposals with the Planning Authority at the earliest opportunity. For the purposes of the policy, open space includes play spaces and pitches, allotments, parks and natural green space with public access but excludes landscape buffers, SUDs drainage systems and small incidental areas of green space with no recreational function.