

Call for Sites

Summary of Call for Sites process

Current text in the submission plan - *This consultation included a request for alternative sites to come forward. No sites were put forward by landowners and of those suggested by the public none were available or appropriate for development.*

Suggested replacement text – *The consultation on the sites that had been assessed included a ‘Call for Sites’ to check whether there were any alternative potential sites available that people could suggest. This was advertised on the BNDP website and on the town council website. Notices were put up at locations in the town, and word of mouth helped to spread the news. Stands that were manned were erected at the co-op and library on specific dates which were advertised across the parish.*

The Call for Sites element took a modest approach, simply asking people to suggest potential sites and identify the location of them, ideally with a supporting map. This was felt to be a sufficient and proportionate method bearing in mind that:

- *Some sites had already been assessed by an independent consultant for the NP group, and this process had identified a suitable site;*
- *The NP group could think of no other suitable parcel of land;*
- *The Group did not want to deter people from suggesting sites by virtue of requiring onerous amounts of information; and*
- *Bungay is very constrained, especially by flood risk (see Appendix B), which limits suitable sites.*

A small number of sites were suggested. Two were not specific sites or locations. The others were within the development boundary and so benefit from a presumption in favour of development anyway. Most were brownfield sites and so again should potentially secure permission given the strength of support in the NPPF, which is to give substantial weight to proposals for housing on brownfield land within settlements. Sites, or at least the developable area of them, were also generally too small for allocation, being below 0.5ha, which is a common lower threshold used in local plans, chosen so as to trigger the provision of affordable housing, which is desperately needed. There were also more detailed constraints pertaining to some sites. On this basis, it was decided that there would be no benefit in carrying out a detailed assessment and reconsulting or considering allocating any of the sites put forward following the February 2020 consultation

We have provided a more detailed explanation regarding the whole site selection and assessment process. If the Examiner feels this to be useful, it could potentially be included as an Appendix in the BNDP.

Strategic Environmental Assessment

Support the Examiner’s recommendations and conclusions and await any further recommendations regarding minor changes in due course. We have checked with Locality regarding the methodology used and been reassured on that. We have also checked with AECOM and received the same reassurances. Interestingly, other Neighbourhood Plans in East Suffolk that have been supported by the same SEA methodology have successfully been through the process and been ‘made’.

Policy H3

Agree with Examiner's interpretation in that the policy supporting First Homes Exception Sites has no impact on the determination of any proposals for Rural Exception Sites. However, it is our understanding that as things stand, Bungay, being a market town with a population of over 5,000 people, would not be an acceptable parish for Rural Exception Sites. Local plan policy WLP8.6 'Affordable Housing in the Countryside' sets out the circumstances when Affordable Housing can be developed outside of the settlement boundaries designated in the local plan (ie. in the countryside). This policy allows for Affordable Housing development adjacent to villages or other rural settlements within the countryside (and Corton). Bungay, being a market town, does not qualify. There are no other means in the local plan for Affordable Housing to be delivered on a rural exception site basis. Accordingly, rural exception sites, which could deliver Affordable Homes to rent in response to the need established in the neighbourhood plan and the evidence base, cannot come forward in the East Suffolk part of the neighbourhood area under either local or national policy.

Indeed, this is one of the reasons why Policy H3 sets out that First Homes exception sites will be encouraged, because the group felt strongly about trying to help local people have their own home and stay in the community and Rural Exception Sites could not provide this.

ESC has brought to our attention a policy in the Reydon NP. Similar to Bungay, Reydon does not qualify for rural exception developments. However, in their neighbourhood plan they included policy RNP3 which allows for Affordable Housing development to take place on the edge of the village (subject to criteria). It appears that this could after all have been an option, but we are where we are, and the NP group is content to see Policy H3 stay as it is.

Policy H4

It is suggested that it is amended to 'St Johns Road'

Policy TM1

NPPF para 107 states that in setting local parking standards the following points need to be considered:

- the accessibility of the development;
- the type, mix and use of development;
- the availability of and opportunities for public transport;
- local car ownership levels; and
- the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles

The parking standards in Policy TM1 are the same as the standards in the *Suffolk Guidance for Parking Technical Guidance. Third Edition, May 2019. (Suffolk County Council)*. Being guidance only, it was felt that the standards would be given more weight if reflected in planning policy.

Because the standards in TM1 are the same as the county council's standards, it was felt that the need for robust supporting evidence was not required. The NPPF criteria were discussed in relation to SCC's parking standards and it was decided that there would not be strong evidence that would justify departing from SCC's standards, especially given the need for off-road parking so that people can charge their EVs in the future. However, this process was not recorded, which on reflection it should have been.

Perhaps it would be helpful to add a reference to SCC's parking standards in the plan.

Full explanation of site allocation process and call for sites (possibly for an Appendix)

National planning guidance sets out that, “A neighbourhood plan can allocate sites for development, including housing. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.”

For the Waveney Local Plan, East Suffolk Council invited a call for sites and a number of sites were put forward by landowners or developers. It should be noted that the Broads Authority carried out a similar exercise but no sites were put forward. The district council assessed the sites put forward, two of which were subsequently allocated in the Local Plan. The Neighbourhood Plan group was interested in assessing the remaining sites. The neighbourhood plan group commissioned a consultant to undertake an independent site appraisal for the BNDP on behalf of Bungay Town Council to help determine which of the known sites would be suitable, available and achievable, as required by the National Planning Policy Framework.

The report assessed each of the sites against a range of criteria such as flood risk, impact on the natural environment, and access. As part of each assessment, a recommendation was made for each site. Only one of the sites was recommended to be taken forward for potential allocation. This has resulted in the allocated site (Policy H4) in the BNDP.

The assessment of the sites is available in a separate document.

The Government also has guidance on Housing and Economic Land Availability. This is essentially aimed at LPAs as there is no reference in it to NPs. Nevertheless, the Planning Practice Guidance does provide a link to it, so it should be seen as pertinent guidance. This does suggest that a call for sites *could* be appropriate (so as to identify all potential sites and offer transparency) and this should follow a format that requests certain information, such as the location and site area. The Government’s arms-length agency for supporting communities, Locality, offers guidance on a call for sites and suggests that it can include requests for the following types of information: Location, site area/ map, ownership, suggested use, timescales, barriers to delivery.

The group, although generally content that the preferred site from the site assessment process would meet requirements and provide a good site for development, decided to have a belt and braces approach and double check the views of residents on all of the sites as well as whether there were any other sites that could be considered.

The BNDP consultation did not want the call for sites to be too onerous for respondents and so requested the minimum information necessary as a starting point, this being the location and site. The suggested use for housing was already established. If any were suggested that had merit, further information, such as legal constraints, contamination, timescales etc would have been ascertained. This process has due regard to the guidance.

The combined consultation on the assessed sites and the call for sites was in February 2020.

The key question was:

“Q6. Are there any other sites you would like us to consider and assess?”

If you answered yes to Q.6 where are they? Feel free to attach a map or sketch to indicate the location of the sites you are putting forward.”

85% of respondents said no to Q6, regarding additional potential sites, but there was support for the preferred site (what is now Policy H4).

The consultation on potential sites was advertised on the BNDP website and on the town council website. Notices were put up at locations in the town, and word of mouth helped to spread the news. Stands that were manned were erected at the co-op and library on specific dates which were advertised across the parish.

This call for sites took a modest approach, bearing in mind:

- Some sites had already been assessed by an independent consultant for the NP group, and this process had identified a suitable site;
- That the NP group could think of no other suitable parcel of land; and
- That Bungay is very constrained, especially by flood risk (see Appendix B).

Although a more expansive and comprehensive approach could have been taken, it was nevertheless felt that this was sufficient for the purpose. The BNDP should have due regard to the guidance on a Call for Sites, but it does not need to be fully consistent. Furthermore, the call for sites is just one tool used for identifying potential sites, which can include examining maps to identify sites, and using local knowledge of land and landowners. The members of the steering group are local people with an extensive knowledge of the area and they were unaware of other developable and suitable sites.

The NDP consultation also did not want the call for sites to be too onerous for respondents as it did not want to deter potential promoters by requiring extensive amounts of information.

A small number of sites were suggested, as shown in the table below. Two were not specific sites or locations. The others were within the development boundary and so benefit from a presumption in favour of development anyway. Most were brownfield sites and so again should secure permission given the strength of support in the NPPF, which is to give substantial weight to proposals for housing on brownfield land within settlements. Sites, or at least the developable area of them, were also generally too small for allocation, being below 0.5ha, which is a common lower threshold used in local plans so as to trigger affordable housing, which is desperately needed. There were more detailed constraints pertaining to some sites and these matters are covered in the table below.

On this basis, it was decided that there would be no benefit in carrying out a detailed assessment and reconsulting or considering allocating any of the sites put forward following the February 2020 consultation. This would simply have served to increase the timescales and costs of the plan making process.

The following table provides some narrative against each proposal.

Suggested site/ area	Narrative
Corner of St John’s Rd and Bardolph Road – the old garage	Within settlement boundary and a brownfield site, and so no need to allocate as it can come forward as a windfall site. It is around 0.15ha and so considerably below the lower level used for allocation (0.5ha is typically used).
Flats on old garage site	
Flixton Road	Not a specific site

Land at the junction of Hillside Road East and St John's Hill	<p>Fluvial flood risk zone 2 across most of the site, as well as surface water flooding. The NPPF aims to direct development to areas of lower flood risk as part of the sequential test. The flood risk restricts how much of the site could be used for development to below 0.5ha, so below the commonly used threshold for allocations. Within settlement boundary and so no need to allocate as it can come forward as a windfall site anyway.</p> <p>Town Council has spoken to landowner with a view to using it as green space.</p>
Community Centre	<p>Community centre is indeed being relocated. The builder of the new one is aiming to get planning permission for housing on the old site. Outline permission has been refused but some form of permission for housing is inevitable and welcomed and is just a matter of detail. Well below 0.5ha, the usual lower threshold for allocations. Within settlement boundary and so no need to allocate as it can come forward as a windfall site</p>
Brownfield sites	<p>Not specific enough and benefit from NPPF presumption in favour anyway</p>
Old Bungay Middle School	<p>This is currently used as a Pupil referral unit. The wider site is currently subject to negotiations to use the grounds for on-going community uses in perpetuity.</p> <p>Within settlement boundary and so no need to allocate as it can come forward as a windfall site if the landowner so wishes.</p>
Mayfair Road	<p>Not specific enough, and within settlement boundary and so no need to allocate as it can come forward as a windfall site</p>
Change of use for commercial properties, especially in Upper Olland Street	<p>Not specific enough. Each separate premise will be too small to allocate. Many different landowners. Change of use does not need to be an allocation as it will be covered either by permitted development rights or other policies in the local plan and neighbourhood plan</p>