

Monday 11 July, 2022

By Email

Mr Andrew Freeman BSc (Hons) DipTP DipEM FRTPI
c/o Steve Carnaby
Associate Director
Intelligent Plans & Examinations (IPE) Ltd
3 Princes Street
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Dear Mr Freeman,

Blakeney Neighbourhood Plan - Examiner's procedural letter and questions

Thank you for seeking the Council's clarification on Policy 1 of the Blakeney Neighbourhood Plan.

North Norfolk District Council does not support the use of a planning policy in the application of local lettings restrictions, nor supports the proposed cascade and the approach that will give priority to Blakeney residents (current and previous) in all future affordable housing provision as set out in the submitted neighbourhood plan policy (for the reasons outlined in our previous submission).

Given our in-principle objection that this matter is considered to be outside the scope of land use planning, we would be interested to understand the examiners reasoning and justification for such an approach if it were to be retained in the BNP, before agreeing to the use of any potential modification and its wording in this area.

That said, and without prejudice, in the event of such an approach remaining and being adequately justified we would advocate the continued use of our published local lettings criteria (attached) being applied solely to that element of affordable housing delivered via our adopted rural exceptions policy. This would ensure consistency of approach and provide for equal priority access to those in Blakeney together with the adjacent parishes in the application of the cascade, rather than to give absolute priority to Blakeney residents. All other affordable housing would be subject to the approach contained in the adopted Housing Allocation Scheme (attached), which gives priority through needs 'banding' and then local connection in order to satisfy the Council's statutory housing duties and to comply with equality legislation. This also helps the Council to fulfil the strategic policy requirements of Blakeney as set out in the local plan spatial hierarchy, and

identified wider housing needs, as evidenced through the Strategic Housing Market Assessment.

The Council maintains its opinion that there is no need or justification contained in the submitted documents for the policy or modification and that in any resulting policy/aspiration it would be unnecessarily complicated to include the details of the cascade. For example, the policy would be significantly more effective if it just stated:

Priority for the allocation of affordable homes on exception sites will be given to eligible households with strong local connections determined by application of the North Norfolk District Council's Local Allocations Agreement. For all other affordable housing, priority will be given in accordance with the adopted NNDC Housing Allocation Scheme.

Adopting this potential approach would have the added advantage of ensuring that compliance with any subsequent updates to the Housing Allocations Scheme policy, which is periodically reviewed to ensure equality and fairness, is maintained. If such an approach was proposed there would also be a requirement for considerable contextual amendments to the supporting text.

Our consultation response, including the schedule of response, highlights the issues with the policy as proposed, and we remain concerned that inclusion of such a policy is not founded on proportional, robust evidence, nor justified.

We would be happy to discuss this further should the need arise.

Yours sincerely

Iain Withington

Planning Policy Team Leader

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cc Tracey Bayfield, Clerk to Blakeney Parish Council