



The countryside charity Norfolk

Affordable Housing in Norfolk – how far are aims and needs being met?

Executive Summary

It is clear that a lack of truly affordable housing across the country is a significant element of the 'housing crisis'. CPRE Norfolk seeks to establish the causes and extent of this lack of affordable housing in Norfolk, and to suggest some potential solutions.

The findings of this report show:

- Local Plans across Norfolk, which are key to allocating sites for, and policies that can encourage or dissuade, the delivery of affordable housing, have not been as effective as necessary regarding affordable provision. A large part of this is due to national policy, which increasingly has encouraged market housing, while making it more difficult and less profitable to deliver much-needed social rented housing.
- National Planning Policy has made it easier for developers to provide more profitable forms of affordable housing, rather than delivering social rented affordable housing, for which there is the most critical need.
- Local Plans have not made the most of the, admittedly few, opportunities provided for by national policy to help deliver as much social rented housing as they could. In particular, the increased number of Local Plan policies potentially permitting market housing and other development on the edges of settlements has discouraged or will discourage the supply of sites for affordable rural housing.
- While Local Plans have tended to have high aspirational targets for affordable housing as demonstrated by the headline percentages in their various (affordable) housing policies for major sites, these have not been met due in large part to national policy allowing developers to cite a lack of economic viability when deciding how many affordables to build, and also by having Local Plan policies which arguably put provision of total numbers of (market) dwellings above the need to provide social rented affordable housing as well as market housing.
- The two main mechanisms by which it is expected that affordable housing will be provided are largely and increasingly not fit for purpose. These are the policy by which rural exception sites outside but adjacent to settlement boundaries should be used for affordables, alongside the aim for major developments (generally of 10 dwellings or more) to provide a percentage of affordables together with market housing.

The recommendations of this report are:

- National Policy should redefine what is meant by 'affordable housing', so that discounted market housing and starter homes are removed from the definition, unless these categories are clearly linked to average local incomes and not just property prices.

- Clear, unambiguous and binding targets should be set for affordable housing, particularly for social rented dwellings.
- Greater (government) support is required to deliver affordable housing on rural exception sites, which would enable small scale affordable housing schemes to be built on the edge of rural settlements. This should include policy changes at national and local level to make it easier for such sites to come forward and to make it harder for other types of development in these locations to take place, in addition to the greater provision of grant funding for rural exception sites.
- Restrictions on the resale of affordable housing stock across rural parishes should be extended and enforced, so that these properties continue to be occupied by local residents, and not as second or holiday homes.

Introduction

With England apparently in a ‘housing crisis’ it will be useful to examine to what extent there is a need for affordable housing, at a time when most political parties and politicians along with media outlets focus on the headline annual targets of mass-building of housing, with 300,000 p.a. being the most usually quoted figure. This is rarely broken down to provide the number of required affordable dwellings, let alone to give any perception of where these houses may be needed in terms of a regional distribution, or a rural/urban split.

These already cloudy waters are made murkier still when one considers what should be and what is defined as an ‘affordable’ dwelling. Here, it makes sense to use the definitions as laid down by the current version of the National Planning Policy Framework (NPPF), as these are what will be used by Local and Central Government in their statistics and the planning process. Here (NPPF, September 2023) we have affordable housing defined as ‘housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions’, before going on to give four sub-categories: affordable housing for rent; starter homes; discounted market sales housing; other affordable routes to home ownership, along with further details of each of these sub-categories (see appendix 3.) These definitions have been maintained in the December 2023 update (NPPF, December 2023.) It is clear from the four sub-categories that, to many, it would be difficult to see starter homes and discounted market sales housing meeting any strict definition of what is meant by ‘affordable’. Those categories are likely to be a lot less affordable than what traditionally has been termed as social housing for rent, which would fit under the first sub-category, ‘affordable housing for rent’.

This report aims to establish what the affordable housing needs are for the various Norfolk Local Planning Authorities, how well these needs have been met since the introduction of the NPPF in March 2012, and what factors affect the supply of affordable housing, particularly in rural areas. Some of these issues will be addressed through examples drawn from the planning caseload of one of Norfolk’s Local Planning Authorities: Breckland District Council.

Affordable housing and Local Plans in Norfolk

In Norfolk there are eight Local Planning Authorities (LPAs), Breckland District Council, Broadland District Council, the Broads Authority, the Borough Council of Great Yarmouth, the Borough Council of King’s Lynn and West Norfolk, North Norfolk District Council, Norwich City Council, and South Norfolk District Council. These eight LPAs are responsible for six Local Plans, with Broadland District

Council, Norwich City Council and South Norfolk District Council combining for their Local Plan in the Joint Core Strategy (JCS) and for the shortly to be adopted Greater Norwich Local Plan (GNLP.)

Each of these Local Plans have been or are to be adopted at different times, sometimes making direct comparison between them difficult, especially given the various updates and amendments to the NPPF, along with issues within each of the LPAs, in particular whether that LPA can at any given time demonstrate that it does have at least a five year supply of land for housing. This latter point is of great relevance when it comes to whether a LPA grants planning permission for applications for housing, given the weight given to this issue in the NPPF, although this is set to change in the December 2023 amendments to the NPPF.

Turning to what each Norfolk Local Plan states about affordable housing, it is understandable that these have been reactive to the NPPF and its subsequent amendments, with previously higher percentages of affordable houses being required on, sometimes relatively small, developments, being altered in later Local Plans due in large part to national policy, which is discussed below.

Table 1: Norfolk LPAs – Affordable Housing Policies in Local Plans

| LPA | Local Plan in force 2012 | Affordable housing policy summary | Subsequent Local Plan | Affordable housing policy summary |
|---|--|--|--|---|
| Broadland, Norwich City & South Norfolk | Joint Core Strategy: adopted March 2011; amendments adopted January 2014 | On all sites of 5 or more dwellings (or 0.2 ha or more): on sites of 5-9 (or 0.2 – 0.4 ha) 20%; on sites for 10-15 (or 0.4 – 0.6 ha) 30%; on sites for 16 or more (or over 0.6 ha) 33% with approx. 85% social rented and 15% intermediate tenures | Greater Norwich Local Plan: Main Modifications December 2023 | Major residential development proposals [10 dwellings or more] will provide at least 33%, except in Norwich City Centre where the requirement is at least 28%; a mix of affordable housing sizes, types, and tenures in agreement with the LPA |
| Breckland | Breckland Local Plan 2011 | 40% of the total number of housing units will be provided and maintained as affordable housing within all new residential development on sites which the LPA determines has a capacity for 5 or more dwellings; or comprises of an area of 0.17 ha or larger | Breckland Local Plan 2019 | Residential development proposals capable of delivering 10 or more units, or the site has an area of 0.5 ha or more will be expected to deliver a proportion of the development as affordable housing on-site; 25%; at adoption a tenure split of 70:30 rented to shared ownership/ intermediate products |

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|----------------------------|---|---|--|--|
| Great Yarmouth | Great Yarmouth Part 1, Core Strategy 2015 | In Caister-on-Sea, Gorleston, Great Yarmouth north and Northern Rural 20% for 5+; Bradwell, Great Yarmouth South and South Quay, Gorleston West and South West Rural 10% for 5+; Great Yarmouth Town Centre 10% for 15+ | Great Yarmouth Local Plan Part 2 2021 | In Caister-on-Sea, Gorleston, Great Yarmouth north and Northern Rural 20% for 10+ or site area of 0.5 ha or more; Bradwell, Great Yarmouth South and South Quay, Gorleston West and South West Rural 10% for 10+ or site area of 0.5 ha or more; Great Yarmouth Town Centre 10% for 15+ or site area of 0.5 ha or more |
| King's Lynn & West Norfolk | Local Plan Core Strategy 2011 | 15% within the built up area of King's Lynn; 20% in all other areas. The thresholds over which affordable housing provision will be sought are: King's Lynn, Downham Market and Hunstanton – sites of 0.33 ha or 10 or more dwellings; Rural areas – sites of 0.165 ha or 5 or more dwellings | Draft Local Plan pre-submission stage 2021 | The percentage which will be sought for affordable housing provision on qualifying sites is: 15% within the built-up area of King's Lynn; 20% in all other areas. The thresholds over which affordable housing provision will be sought are: King's Lynn, Downham Market and Hunstanton – sites of 0.33 ha or 10 or more dwellings; Rural areas – sites of 0.165 ha or 5 or more dwellings |
| North Norfolk | Local Plan 2008 | At least 30% of which approximately 70-80% will be for social rented accommodation with the remainder comprising intermediate/affordable housing. On all schemes of 10 or more dwellings or sites of more than 0.33 ha in Principal and Secondary Settlements, not less than 45%; on schemes | Draft Local Plan Reg. 19 2022 | 6-25 dwellings or sites larger than 0.2 ha: Affordable Zone 1 at least 15% on site; Affordable Zone 2 at least 35% on site. 26+ dwellings: Affordable Zone 1 at least 15% on site; Affordable Zone 2 at least 35% on site |

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|------------|--|---|-----------------|--|
| | | of 2 or more units or on sites larger than 0.1 ha in Service Villages and Coastal Service Villages, not less than 50% | | |
| The Broads | | | Local Plan 2019 | Developments of 10 or more dwellings will be required to provide affordable housing in accordance with the requirements of the relevant district authority |

Most of these Local Plan policies include important caveats in their affordable housing policies or similar, to take account of the viability of the developments.

Therefore, in the Joint Core Strategy this applied: ‘The proportion of affordable housing sought may be reduced and the balance of tenures mended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing’ (Joint Core Strategy, 2014.) In the GNLP the stated percentages of affordable housing could not be met where ‘the site is allocated in a Neighbourhood Plan for a different percentage of affordable housing, or the applicant can demonstrate that particular circumstances justify the need for a viability assessment at decision-making stage’ or where ‘affordable housing on-site except where exceptional circumstances justify off-site provision’ (GNLP, Main Modifications version, November 2023.)

In Breckland, the Local Plan until superseded by that adopted in 2019 stated that ‘the 40% requirement and the precise mix may only be reduced where it is demonstrated to the satisfaction of the Council that existing physical constraints on the site, in addition to the 40% requirement, will result in extraordinary cost which the development could not reasonable be expected to bear. In exceptional circumstances off-site contributions in lieu of built units on site will be considered where evidence is provided to the Council’s satisfaction that wider sustainability advantages would be secured and existing physical constraints will result in extraordinary costs which make the provision of on-site units unviable’ (Policy DC4, Breckland Local Plan, 2011.) For the current Local Plan ‘the applicant will be required to submit an open book viability assessment where schemes do not meet the above policy [DC4] requirements. In such cases the Council will commission an independent review of the viability study, for which the applicant will bear the cost’ (Breckland Local Plan, 2019.)

Although not part of the relevant policy CS4, the Great Yarmouth Local Plan adopted in 2015 includes supporting paragraph 4.4.5. which states in part: ‘However, in the event that providing the level of affordable housing would make a development unviable (i.e. a willing land owner and willing developer would not be provided with competitive returns), the developer should enter into negotiations with the Council to agree what percentage of affordable housing can be provided’ (Great Yarmouth Core Strategy, 2013.)

For the Borough Council of King's Lynn and West Norfolk (BCKLWN) policy CS09 states that: 'The Borough Council will vary this percentage and/or threshold(s) in line with a model of dynamic viability. The levels will be reviewed annually in consultation with a stakeholder group informed by the following factors: market land values; house prices; level of contributions sought overall; index of build costs' (BCKLWN Core Strategy, 2011.) Policy LP28 in the Local Plan currently being reviewed includes three paragraphs on commuted sums, including the desirability for affordable housing to be provided on-site and: 'off site-contributions in lieu of built units on site will only be considered where this is robustly justified by evidence. Where the provision of on-site units threatens the viability of the development, the applicant will be required to submit an open book viability assessment in accordance with clause 10 of this policy. A flexible approach on both thresholds and proportions will be taken to ensure scheme viability and balance housing need, negotiated scheme-by-scheme, subject to open book approach by developers' (Chapter 7: Social and Community, BCKLWN draft Local Plan, 2022.)

For North Norfolk District Council's (NNDC) new Local Plan 'Proposals that are fully policy compliant and propose to deliver the full policy ask, including affordable housing requirements at the relevant level set out in the Plan, will be taken to be viable, and as such there is no need to submit a site specific viability assessment. Those that seek a departure from policy on viability grounds will need to substantiate the position through the submission of fully transparent Viability Assessments (NNDC Local Pla, Reg. 19 submission, 2022.)

From this wealth of information and policies it is clear that there are and were aspirations to provide affordable housing on major developments across Norfolk, although these aspirations have had to be lowered probably largely due to the restrictions imposed by national policy. Had this not been the case it is likely that Local Plans would have retained the requirement for higher levels of affordable housing as shown by the earlier policies in Table 1. From this it can be seen that, before the NPPF in 2012, several LPAs had a threshold of 5 dwellings before they had to provide some affordable housing, whilst the overall percentages for affordables on major developments were often higher e.g. in Breckland before the NPPF the aspiration was for major developments to provide 40% affordables, while in the JCS area the figure was 30% or 33% depending on the size of the development. However, it is also the case that Local Plan policies have not gone as far as possible in providing mechanisms to provide affordable, and particularly social rented, housing. This will be demonstrated below in the section covering rural affordable housing in Norfolk.

The National Planning Policy Framework (NPPF) and other National Policy

The NPPF was first introduced on 27th March 2012 and since that date has sat as the higher level of planning policy for all (Norfolk) LPAs. The statements regarding affordable housing as with all other covered issues have to be followed, which led at first to some conflicts between already-adopted Local Plans and the NPPF, and subsequently in Local Plans coming into line with the requirements of the NPPF, as each was reviewed in turn. A further complication has been that when the NPPF has been updated (on 24 July 2018, 19 February 2019, 19 June 2019, 20 July 2021 and 5 September 2023, and further changes to be made in December 2023), so the same pattern has followed. The same issue, although to a lesser extent, has been the case with each update of relevant National Planning Practice Guidance (NPPG) and with issuing of relevant Ministerial Statements. For the purposes of this report, it will be useful to have an overview of the various NPPF amendments in relation to the requirements for affordable housing.

One important change in the way the NPPF addresses affordable housing is through the definitions it uses in the glossary. In the original March 2012 version, homes such as "low cost market" housing,

are specifically excluded from being considered as affordable housing for planning purposes. However, in 2018 this type of housing was then included within the definition of “affordable housing”.

The use of “rural exception sites” as a means of delivering affordable housing has been enshrined in the NPPF from its beginning and continues up to the current 2023 version. This allows the use of small sites which would not normally be given permission for housing developments, usually outside but adjacent to rural settlement boundaries, to be used for affordable housing. The possibility of allowing some market housing on the same site is included, when this may be essential to allow the delivery of the affordables.

The 2018 update saw an increased focus on the provision of affordable housing, whilst at the same time setting clearer and more stringent limits on when this had to be provided on-site. Whereas the original NPPF required LPAs to set policies to meet the need for affordable housing on site, except when off-site provision or a financial contribution could be “robustly justified” (para. 50 NPPF 2012), the 2018 version while maintaining the same preference for on-site affordable housing, accepted that “provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas [i.e. National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985] (where policies may set out a lower threshold of 5 units or fewer)” (para. 63 NPPF 2018.) It went on to state as a standard requirement that on major developments at least 10% of the dwellings should be affordable (para. 64 NPPF 2018.) This expectation of providing at least 10% affordable housing on major developments has continued to the present (para. 64 NPPF, September 2023.)

At this point it is useful to consider what is meant by “rural” under Section 157 of the Housing Act and therefore in the relevant parts of the NPPF, as this could enable more affordable housing to be delivered on sites which are not ‘major’ ones. As well as this benefit for providing affordable housing, designation as a ‘rural’ area, as well as the more clearly defined National Parks and AONBs, restricts the future sale of former council homes bought under the Right to Buy scheme to buyers or tenants who must have lived and/or worked in the local authority for three years or more (‘State of Rural Affordable Housing’, CPRE, 2023.) In these areas and circumstances owners wishing to sell one of these properties must inform the local authority and gain consent for the sale to ensure the property is marketed for use as a principal residence for local people. This should help to prevent properties from becoming holiday lets or second homes. However, despite the importance of Section 157 legislation in helping to protect affordable housing and in keeping housing for local residents, it is disappointing to see that nationally only 51% of all parish councils in rural or significantly rural areas are designated as ‘rural’ under Section 157. To add to this disappointment, only two of Norfolk’s local authorities (plus the Broads) have Section 157 restrictions, these being King’s Lynn and West Norfolk, and North Norfolk, in which also sits the Norfolk Coast AONB. This means that large swathes of rural Norfolk are not designated as such, and therefore an important tool to help keep affordable or former affordable housing available for local residents, and to build more affordable dwellings on smaller sites, is not being used.

Alongside the NPPF there have also been Written Ministerial Statements relevant to the issue of affordable housing. Of these, that of 28th November 2014 by the Minister of State for Housing and Planning, Brandon Lewis, which sought to support small scale developers, custom and self-builders, was probably the most significant for affordable provision. In part it did this by changing Section 106 planning obligations so that: ‘due to the disproportionate burden of developer contributions on small scale developers, for sites of 10-units or less, and which have a minimum combined gross floor space of 1,000 square metres, affordable housing and tariff style contributions should not be sought’

(House of Commons: Written Statement (HCWS50).) It went on to note that this change was not to apply to affordable housing provided on rural exception sites.

National Planning Practice Guidance (NPPG) has also had some relevance to affordable housing. In particular, an amendment to the guidance in November 2014 which included stating that LPAs could no longer seek affordable housing for developments of 10 units or less provided that the combined gross floor space does not exceed 1,000 square metres. Again, this amendment did not apply to rural exception sites.

The effect of these changes, both through the introduction of the NPPF and its subsequent changes, along with the issuing of Written Ministerial Statements, had a profound outcome for the provision of affordable housing. Rather than being able to set lower thresholds for when affordables had to be provided, and to have high percentages of affordables to be provided by major developments, these features were successively weakened to the present. Adding to this, the 'watering down' of the definition of what is affordable housing, has led to the provision of fewer truly affordable i.e. social rented, dwellings across Norfolk.

Breckland District Council – an Affordable Housing Case Study

To drill down further into what Local Policy states and what is actually delivered, especially when looked at alongside National Policy, a detailed examination has been made of determined planning applications across Breckland District Council from the introduction of the NPPF in March 2012 and 1st October 2023. Breckland was selected due to being a largely rural District, with the exception of its five market towns of Attleborough, Dereham, Swaffham, Thetford and Watton. A summary of the relevant planning applications which have been determined during that period is given in Appendix 2.

At the time of the introduction of the NPPF in March 2012, Breckland District Council's Local Plan had ambitious aspirations for the provision of affordable housing, with all developments of five or more dwellings, or 0.17ha or larger, being expected to provide 40% of the dwellings as affordable housing. However, it was also possible for this percentage to be lowered if an approved viability assessment proved that such a percentage of affordable housing made a scheme unviable.

Until 2017 many developments were approved on the basis of them delivering policy-compliant 40% affordables, although many others submitted viability assessments which were approved and allowed to decrease the affordable provision from this aspirational amount. For example, these applications provided 40% affordables in line with Breckland's Local Plan Policy DC4:

3PL/2015/1267/O was approved on 5th May 2017 for 14 market houses and 9 affordables;
3PL/2015/1191/O approved on 10th November 2017 was for 98 dwellings of which 39 were affordables;
3PL/2015/1155/O approved on 3rd January 2017 for 130 dwellings including 52 affordables;
3PL/2015/0879/O approved on 30th June 2016 for 5 dwellings of which 2 were affordables;
3PL/2015/0761/D approved on 20th October 2015 for 11 dwellings including 4 affordables;
3PL/2015/0498/O approved following appeal for 65 dwellings of which 26 were affordables;
3PL/2015/0279/O approved on 24th August 2016 for 35 dwellings including 14 affordables;
3PL/2015/0219/F approved after an appeal for 73 dwellings including 29 affordables;
3PL/2014/1355/O approved on 30th January 2017 for 51 dwellings including 20 affordables;
3PL/2014/1253/O approved following an appeal for up to 180 dwellings with 40% affordables;
3PL/2014/1006/O approved on 16th February 2016 for up to 43 dwellings with 40% affordables;
3PL/2014/0945/O approved on 24th July 2015 for 18 dwellings of which 40% affordable;
3PL/2014/0820/O approved on 11th January 2016 for 44 dwellings with 40% affordables;

3PL/2014/0683/F approved following appeal for 39 dwellings with 15 affordables; 3PL/2014/0358/O approved on 14th October 2015 for 55 dwellings with 40% affordables; 3PL/2013/1123/O approved on 29th January 2015 for 24 dwellings with 40% affordables; 3PL/2013/0869/F approved on 29th January 2014 for 29 dwellings with 41% affordables; 3PL/2012/1259/F approved following an appeal for 73 dwellings including 29 affordables; 3PL/2012/0660/O approved on 2nd October 2014 for 11 dwellings of which 4 affordable; 3PL/2012/0509/F approved on 30th November 2012 for 5 dwellings and 2 affordables; 3PL/2012/0503/O approved on 9th January 2014 for 31 dwellings with 40% affordables. These approved applications demonstrate that the 40% requirement for affordable housing was successfully applied on many occasions.

However, there are more examples from the same time period of applications being approved which provided less than the 40% affordable housing required under policy DC4 of the Local Plan. These were almost invariably on the grounds of viability, with viability assessments being submitted and approved or modified by the appointed District Valuer. A full list of such approvals are to be found in Appendix 2, but include: 3PL/2015/1180/O approved on 29th July 2019 for 40 dwellings with 22.5% affordables; 3PL/2015/1045/O approved on 25th September 2020 for 62 dwellings with 11% affordables; 3PL/2015/0926/D and 3PL/2012/1093/O for 55 dwellings with 25% affordables; 3PL/2015/0919/O approved on 6th September 2017 for 16 dwellings with 12.5% affordables; 3PL/2015/0917/O approved on 30th January 2020 for up to 185 dwellings with 25% affordables; 3PL/2015/0769/O approved on 22nd January 2016 for 9 dwellings with 33% affordables; 3PL/2015/0550/O approved on 9th July 2018 for up to 165 dwellings with 29.7% affordables; 3PL/2015/0546/O approved on 20th January 2017 for 165 dwellings with 25% affordables, following applicant's proposal for 4% affordables; 3PL/2014/1378/F approved on 5th September 2017 for 80 dwellings with 7% affordables; 3PL/2014/1264/F approved on 29th July 2016 for 91 dwellings with 30% affordables; 3PL/2014/0359/D approved on 6th August 2014 for 82 dwellings with 26% affordables; 3PL/2013/1161/O approved following appeal for up to 350 dwellings with 20% affordables; 3PL/2013/0983/O approved on 9th February 2015 for 31 dwellings with 0% affordables; 3PL/2013/0886/F approved on 31st December 2013 for 25 dwellings with 20% affordables; 3PL/2013/0510/F approved on 28th May 2014 for 110 dwellings with 25% affordables; 3PL/2013/0110/F approved on 29th August 2013 for 335 dwellings with 22% affordables; 3PL/2013/0095/O approved on 18th June 2014 for 90 dwellings with 13.3% affordables; 3PL/2012/1045/O approved on 11th July 2014 for 37 dwellings with 27% affordables; 3PL/2012/0958/H approved on 20th December 2012 for 375 dwellings with 35% affordables; 3PL/2012/0898/O approved on 16th May 2014 for 220 dwellings with 15% affordables; 3PL/2012/0805/O for up to 5,000 dwellings with 15% affordables for phase 1 of 500 dwellings and 10% affordables for remainder.

It is disappointing to note that many of those developments for large estates are among those failing to deliver policy-compliant 40% affordable housing. As stated, this is usually due to viability assessments being conducted which demonstrate that without a reduction in developer-contributions including on-site provision of affordables, the schemes would be unviable. Reasons cited are due to development costs, including additional infrastructure. Sometimes the reduction below the aspirational 40% in policy DC4 in affordable provision is due to the development providing community facilities, open space, or land for a community hall or school. Other costs which are included for some of these developments are the high costs of preparing the site for construction. These cover demolition costs of previous structures and sometimes de-contamination of a site. It should be noted that the costs associated with such brownfield development can lead to an under-provision of affordable housing. Examples of this are seen with the following applications: 3PL/2015/0919/O in North Elmham for 16 dwellings including 2 affordables; 3PL/2015/0546/O in

Attleborough for 165 dwellings with 25% affordables; 3PL/2014/0328/O in Mileham for 11 dwellings including 1 affordable; 3PL/2013/1045/O in North Elmham for 19 dwellings with 0 affordables; 3PL/2009/0385/O in Dereham, approved on 6th October 2017 for c.40 dwellings with an off-site financial affordable contribution.

On occasion, approved developments have later sought to reduce or remove the affordable provision through amending their S106 agreements following a revised viability assessment.

Looking at the impact of the amendment to the National Planning Practice Guidance in November 2014, it is clear that a number of smaller developments had their affordable contribution changed due to the increase in the threshold at which affordables were required to be provided on site. This amendment for no on site affordable housing to be required for sites of 10 or fewer dwellings or which are below 1,000 square metres gross internal area (GIA) could conflict with the Local Plan at that time, which required on site affordables for a site larger than 0.17 ha. On these occasions the national policy took precedence for example at these approved applications: 3PL/2015/1316/F approved on 5th September 2017, where the site's GIA was 999.7 square metres, thus escaping the need for providing affordable housing; 3PL/2014/1002/F in Caston for 8 dwellings following demolition approved on 24th February 2015; 3PL/2014/0979/O in Dereham for 8 dwellings approved on 11th June 2015; 3PL/2014/0486/O in Hockering for up to 10 dwellings on a site originally proposed for 15 dwellings and then 18 with the latter being refused permission, approved on 14th October 2015.

In addition, some previously approved applications submitted new applications to amend the relevant parts of their S106 agreements relating to the affordable housing provision both on and off site, following the November 2014 change in National Policy, so the affordable housing was reduced or removed. Examples of this are provided by 3OB/2014/012/OB for Quinton House, Watton, where 3 affordable units were removed from a scheme for 9 units in a converted residential home, approved on 20th March 2015; 3OB/2016/0013/OB where the 40% affordables on an 8 flat scheme were removed when approved on 3rd May 2017; 3OB/2018/0009/OB in Thetford, where a building conversion was to lead to 9 flats with an affordable contribution of £27,533, which was removed following this later application. On a handful of occasions, applications to reduce the affordable provision on small sites was resisted with applications being refused. An example of this is 3OB/2016/0011/OB at Swanton Morley, where the original application was to convert a building to 4 affordable flats. Despite the scheme falling below the thresholds for both number of units and size of Gross Internal Area work had started, proving to the LPA that the national policy changes were not needed for the scheme to be viable for 4 affordable units as permitted.

The other major reason for changes in affordable provision in Breckland came with the adoption of a new Local Plan in November 2019, which in part as far as affordable housing provision was concerned, brought it into line with the way that National Policy including the NPPF had developed since 2012, particularly bearing in mind that the previous Breckland Plan had been adopted before the NPPF had been introduced.

Here, the new Local Plan policy HOU07 stated in part that residential development proposals capable of delivering 10 or more units, or the site has an area of 0.5 ha or more will be expected to deliver a proportion of the development as affordable housing on-site at 25%. This reflected the 2018 changes in the NPPF for major developments of 10 or more dwellings or of sites of 0.5 ha or more to provide at least 10% affordable units.

These changes were quickly seen to have an effect on planning applications, with some looking to reduce affordable provision in line with the Local Plan headline change from 40% to 25% affordables before adoption of the new Local Plan as its planning “weight” increased the closer it got to adoption.

A number of examples of how the new policy HOU07 affected affordable provision are now given. Application 3PL/2018/0791/O in Attleborough for 12 dwellings argued that the emerging Local Plan policy should be taken into consideration, meaning that 25% rather than 40% of the dwellings should be affordable. This was accepted by Breckland when approved on 14th April 2019. 3PL/2018/0952/O for up to 180 dwellings in Watton proposed 25% rather than 40% affordables to accord with the emerging Local Plan and the amended NPPF, which was accepted and approved. 3OB/2019/0010/OB looked to amend an existing S106 agreement for an approved application in Dereham to bring the affordables down from 40% to 25% due to Local Plan and NPPF changes, which was approved on 9th January 2020. 3PL/2019/0500/O in Attleborough had a S106 agreement approved to secure 25% affordables to be in line with Local Plan policy HOU07, and was approved on 25th September 2020. 3OB/2019/0018/OB amended the existing S106 agreement for a development in Swaffham, which had originally included 40% affordables, which were subsequently reduced to 28.6% following a viability assessment, and then to 25% by this application due to emerging policy HOU07. 3PL/2019/0713/D in Swaffham followed a similar pattern, in that it had started at 40% affordables when approved, which was then reduced to 28.6% following a viability assessment, before being reduced at the reserved matters stage to 25%, being approved on 13th November 2019. 3OB/2020/0021/OB in Yaxham reduced the affordable provision from 40% to 25%, as did 3OB/2020/0026/OB in Quidenham. 3PL/2020/1179/O in North Lopham reduced a previously approved application for 40% affordable to a new application on the same site for 25%. 3PL/2021/0800/D reduced the affordables from 40% to 25% at a site for 29 dwellings in Banham. 3OB/2021/0031/OB reduced the affordables from 40% to 25% at a site in Dereham. Once the new Local Plan was adopted, as one would expect, the new Policy HOU07 brought about changes to affordable provision across the board, with approved applications generally providing 25% affordables via S106 agreements.

On occasion, just as with the earlier higher 40% requirement under the previous Local Plan, some applications successfully challenged the new 25% affordable requirement, usually following submission of viability assessments. This led to the following examples of below-policy requirement approvals: 3PL/2019/1076/O in Harling for 85 dwellings resulted in 17.6% affordables; 3PL/2020/1197/D reduced the affordable provision on a 62-dwellings site to 7 units following a viability assessment; 3PL/2022/0576/D secured 17.6% affordables for a development in Harling.

On the more positive side for affordable housing provision, there have been a small number of applications over the period from 2012 for developments which are designed primarily to provide affordable housing. Application 3PL/2014/1361/F was approved for 64 affordable dwellings on the edge of Brandon in the parish of Weeting. Of these, most were in Suffolk, although 8 houses and 13 flats were entirely in Breckland with a number of others straddling the county border. 3PL/2015/0562/F in Shipdham provided 24 dwellings, all of which were affordable. Here, an application had been approved previously for 15 dwellings with only the 40% policy-compliant number of affordables. That permission had lapsed by the time of this application. The site is inside the settlement boundary and therefore is not a rural exception site, although it does deliver 100% affordables. 3PL/2015/0623/F in Narborough replaced 12 obsolete affordable houses with 31 new affordables and 2 open market bungalows, once again inside the settlement boundary. 3PL/2018/0719/F in Old Buckenham adjacent to the settlement boundary for 12 dwellings all of

which were affordable. However, this application was superseded by 3PL/2019/1401/F which reduced the total to 9 dwellings, all of which were still affordable. 3PL/2019/1183/F and 3PL/2019/1184/D in Necton for 27 and 46 affordables respectively, with both being 100% of the dwellings. 3OB/2022/0017/OB for a site in Attleborough changed the percentage of affordables secured by a S106 agreement from the original 40% to 100% of the 48 dwellings approved for 3PL/2017/1171/O. Also, in Attleborough, 3OB/2022/0055/OB changed the percentage of affordables from 40% to 100% for the 91 dwellings permitted under 3PL/2014/1264/F. Overall, it is disappointing to note how few applications have been determined for rural exception sites providing affordable housing across Breckland.

Planning permissions do not immediately or sometimes never result in completions of the approved schemes. Therefore, it is also useful to consider the statistics of completions of all housing and affordable housing in particular, provided by the various Annual Monitoring Reports (AMRs.) For Breckland, for the years for which AMRs are available online with 1,230 affordable dwellings being completed in the nine years between 2012/13 and 2021/22. Over the same period, the total number of housing completions was 5,781, giving 21.3% affordables across the whole period as a percentage of the total completions. This 21.3% is in contrast to the aspirational policy requirement of 40% until late 2019, and from then onwards of 25%. Of course, these policy requirements come with various caveats, including the potential use of viability assessments to reduce the percentage/number of affordables, the strictures of national policy, along with housing built on smaller sites where affordables are not a policy requirement. It is clear from the above summary that once national policy changed to reduce the necessary amount of affordable housing on developments, developers quickly and perhaps understandably changed their plans accordingly.

It is also worth noting that the Breckland Local Plan is currently undergoing its five-year review. An additional consultation on the Issues and Options including development strategies is being held in early 2024. This includes the potential for abolishing settlement boundaries where they currently exist, albeit with a range of criteria to control the type and location of new development. If this is adopted it is quite possible it would have the unintended consequence of making it even less likely that sites are put forwards for rural exception sites for affordable housing, as landowners are more likely to keep these for future, more profitable, market housing. With few sites coming forwards under the current system with settlement boundaries, this has the potential of being the final nail in the coffin of rural exception sites in Breckland.

The need for affordable housing in Norfolk

Although not necessarily giving the whole picture, the clearest indication of the need for affordable housing is provided by the housing waiting lists. The figures for Norfolk are given below in Table 2.

It should be noted that these figures are likely to mask others who are in need of housing, including dependents who wish to leave the family household but are unable to do so due to the costs involved and lack of availability of suitable, affordable housing, whether to buy or to rent.

Table 2 gives a clear indication of the need for affordable housing across Norfolk, both in rural and urban areas, with the total number of households on housing waiting lists above 10,000 for the whole period, and sometimes significantly so, particularly before 2016.

Table 2: Number of Households on the housing waiting list (Dept. for Levelling Up, Housing & Communities)

| | 2012/ 13 | 2013/ 14 | 2014/ 15 | 2015/ 16 | 2016/ 17 | 2017/ 18 | 2018/ 19 | 2019/ 20 | 2020/ 21 | 2021/ 22 |
|---------------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Broad | 3,221 | 3,028 | 2,941 | 3,168 | 2,854 | 2,260 | 2,130 | 1,362 | 611 | 812 |
| S Norf | 670 | 584 | 798 | 741 | 588 | 504 | 657 | 734 | 687 | 761 |
| Norwic h | 4,139 | 4,221 | 4,017 | 4,234 | 4,053 | 4,024 | 3,759 | 3,520 | 3,436 | 3,906 |
| Breck | 2,440 | 1,839 | 2,324 | 3,398 | 2,184 | 858 | 1,158 | 662 | 861 | 1,218 |
| G Yarm | 464 | 381 | 309 | 219 | 242 | 258 | 444 | 769 | 754 | 497 |
| KLWN | 5,991 | 2,630 | 2,466 | 1,614 | 1,264 | 891 | 1,146 | 985 | 1,093 | 1,213 |
| N Norf | 4,791 | 2,195 | 2,131 | 2,238 | 2,479 | 2,636 | 3,194 | 2,846 | 2,901 | 2,560 |
| Norfolk | 21,716 | 14,879 | 14,986 | 15,612 | 13,664 | 11,431 | 12,488 | 10,878 | 10,343 | 10,967 |

Rural affordable housing in Norfolk

Given that large housing developments are more likely to be located in larger centres of population as these will have the necessary services and infrastructure, as well as meeting the requirements for sustainability, it has been and continues to be an issue to ensure affordable housing is delivered for rural settlements. This is largely the reason why rural affordable housing can be permitted on sites on which housing developments would not normally gain planning approval. These sites, usually sited just outside but adjacent to settlement boundaries, or adjacent to developed areas where there is no settlement boundary, are often referred to as 'rural exception sites'. These are supported in the NPPF, currently in paragraph 82, which states: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this (NPPF, December 2023.)

Another way in which affordable housing could be delivered on small rural sites is through the use of Section 157 rural designations, which could then allow LPAs to set policies for rural affordables to be required on sites which have fewer than the usual NPPF requirement of at least 10 dwellings. However, as explained above only North Norfolk and King's Lynn & West Norfolk have such designated rural areas. This gap across large parts of rural Norfolk is something which could and should be addressed by other Local Plans. The impact in the respective policies is clear to see, with North Norfolk having the requirement for affordable housing starting at 2 or more units in Service and Coastal Service Villages in the current plan, with the threshold increased to 6 or more units across all settlements in the emerging Plan. In King's Lynn & West Norfolk the threshold is set at 5 or more dwellings in designated rural areas for affordable housing to be required. Unfortunately, across the other LPAs (Breckland, the GNL and the Borough of Great Yarmouth) the threshold is set at the NPPF level of 10 or more dwellings to be the point at which affordables are required, meaning that for small rural sites there will be no requirement for affordables, leaving rural settlements in those areas without a steady supply of these dwellings, unless they are delivered as rural exception sites. However, despite this difference in policies between LPAs with designated rural areas and those without, this is not reflected in the percentages of affordable dwellings being delivered, as can be seen from Table 3. This may be due to the other restrictions put on development within the Norfolk

Coast AONB, which is a key factor in some of the rural areas of North Norfolk and, to a lesser extent, King’s Lynn and West Norfolk.

Having considered the various relevant Local Plan policies and how affordable housing could be delivered it is useful to see how much affordable housing has actually been built across Norfolk in the years since the introduction of the NPPF in 2012. This is shown by examination of the Annual Monitoring Reports (AMRs) for the different LPAs (see Appendix 1.) It is quickly appreciated that the headline percentages of affordable dwellings to be provided as required by the Local Plan policies are not achieved. This is partly due to the policies only applying to major sites, with the exception of North Norfolk and King’s Lynn and West Norfolk where lower thresholds generally apply, but also due to a number of other factors. The most important of these is the so-called ‘viability loophole’ whereby developments which are proved not to be ‘viable’ following the submission of an approved viability assessment, can have the affordable requirement reduced or removed. In the years for which AMRs are available (generally until 2021/22) the following affordables were completed as a percentage of the total number of dwellings in each area, along with the highest percentage for one year.

Table 3: Summary of affordable housing percentages

| | Best year’s % of affordables as part of total housing | % of affordables as part of total housing numbers across the period 2012-22 |
|---------------------------------|--|--|
| Broadland/South Norfolk/Norwich | 34% (2012-13) | 4,194 of 17,683 = 23.7% (until 2021) |
| Breckland | 29.3% (2019-20) | 1,230 of 5,781 = 21.3% |
| Great Yarmouth | 29% (2014-15) | 378 of 2,664 = 14.2% |
| King’s Lynn & W. Norfolk | 38.2% (2012-13) | 477 of 3,339 = 14.3% (until 2020) |
| North Norfolk | 39.7% (2013-14) | 773 of 4,545 = 17% |

One can see from Table 3 that while the best years’ performances for the completion of affordables across the county are impressive, with figures of around 30% - 40% of the total number of dwellings for the best year for each of the LPAs, the averages across the whole period from 2012 to generally 2022, are significantly lower in the range of 14.2% - 23.7%. Moreover, with the exception of Breckland, the best years for the various LPAs are all in the first year or two of the NPPF, before thresholds on the necessary size of development for the requirement for affordables was increased. Another factor to note is what is included within the definition of “affordable” with the broadening of the NPPF definition in 2018 to include various types of low cost market housing which are still unaffordable to many who require social rented accommodation.

Other supply issues for affordable housing

The main factors affecting the supply of affordable housing have been included above. However, there are a number of additional reasons which are or will be contributing further to a lack of supply of affordables.

Since the right to buy was introduced in the Housing Act 1980, allowing council tenants to buy their homes from the state at discounted prices, increasing numbers of such dwellings have not been available as social rented (council) houses. This would not necessarily be an issue for the availability of affordables so long as those being taken away from council ownership were replaced by newly built properties. Unfortunately, as shown in the previous section, this presumably has not been the case, with over 10,000 households having been on the housing waiting lists in Norfolk since 2012. To verify this, one can examine the statistics for the number of properties being purchased under the right to buy scheme, and compare these to the number of new affordables being completed.

Table 4: Properties sold under the right to buy scheme

| | 2012-13 | 2013-14 | 2014-15 | 2015-16 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | 2021-22 |
|---------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Breckland | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Broadland | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Gt.Yarmouth | 21 | 47 | 41 | 39 | 40 | 47 | 50 | 27 | 9 | 18 |
| King's Lynn W. Norfolk | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| N. Norfolk | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |
| Norwich | 90 | 145 | 149 | 151 | 163 | 187 | 138 | 156 | 112 | 159 |
| S. Norfolk | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a | n/a |

Here, it is unfortunate that for the years of the NPPF's existence only two Norfolk LPAs' statistics are available via the Department for Levelling Up, Housing and Communities reports (housing.statistics@levellingup.gov.uk). For those which are available, Great Yarmouth Borough Council and Norwich City Council, the differences between properties sold under right to buy and affordable completions are shown in Table 4. The number of completions is taken from Appendix 1.

Table 4: Right to buy sales alongside affordable completions

| RtoB/ Afford. comps | 2012-13 | 2013-14 | 2014-15 | 2015-16 | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 | 2021-22 | Total |
|---------------------------|------------|------------|------------|------------|------------|------------|-------------|-------------|------------|-----------|---------------|
| Gt.Yarm | 21/ 33 | 47/ 23 | 41/ 56 | 39/ 18 | 40/ 5 | 47/ 37 | 50/ 32 | 27/ 33 | 9/ 77 | 18/ 64 | 339/ 378 |
| Norwich | 90/ 145 | 145/ 32 | 149/ 50 | 151/ 25 | 163/ 44 | 187/ 56 | 138/ 137 | 156/ 184 | 112/ 20 | 159 | 1,291/ 693 |

From these limited statistics it is impossible to draw conclusions for the county as a whole, particularly with the two published sets being for the most urbanized LPAs. It is worth noting that for Norwich the number of new affordables is roughly half of the number sold under right to buy, whilst in the Borough of Great Yarmouth the figures are approximately the same. However, it is clear from the number of households on council housing waiting lists combined with the number of new affordables and the various supply factors, that insufficient affordables are available or being constructed.

One probable factor is the increasing number of Local Plans which are seeing policies which allow for the potential building of market housing of various types, albeit in relatively small numbers, outside but adjacent to settlement boundaries. This will have the logical effect of persuading landowners to sell suitable sites for market housing with a higher land value, than making these sites available for

rural exception sites. While LPAs are looking to meet housing targets, and encourage ‘vitality’ in rural communities, these policies are likely to have the unintended consequence of limiting the development of rural exception sites for affordable housing. Given the number of these across Norfolk since 2012 has been disappointingly low, this is likely to be another and possibly final nail in the coffin of such sites. As noted above, the possibility of Breckland abolishing settlement boundaries when their current Local Plan is reviewed could have an even more negative effect on the availability of rural exception sites in that district.

Relatively recently reviewed Norfolk Local Plans which do this, or propose to do this, include the GNLP (policy 7.5), King’s Lynn and West Norfolk (policy LP31), North Norfolk (policy SS1) and Breckland (policy HOU03.) They all have various criteria designed to limit and control this type of development, as well as some having strictures on what housing will be allowed in these areas e.g. the GNLP limiting this to self-build or custom build housing, but the effect is likely to be as suggested: a reduction in the supply of rural exception sites for affordable housing.

Changes in the NPPF (currently para. 83, NPPF, September 2023) which allow for groups of smaller settlements to have new housing in one or more of these even when the necessary services may be elsewhere in the group or cluster, will also, it is reasonable to suggest, encourage maintaining land for market housing development rather than for affordable housing. This is likely to be seen in Broadland when the GNLP is adopted, and in South Norfolk when the South Norfolk Village Clusters Housing Allocations Plan (SNVCHAP) is adopted, as both plans move to include the concept of village clusters to the rural settlement hierarchy.

One further factor which will have an indirect effect on the number of affordable dwellings being available and constructed is likely to be the number of properties which are either second homes or holiday homes. This is due in part to the likely profit for these types of ownership when compared to releasing these properties as affordables, and also due to the knock-on effects on the property market in general when the supply of market houses is limited. These indirect effects are beyond the scope of this study, but it is interesting to note that, in the three LPAs most affected by this issue, King’s Lynn and West Norfolk, Great Yarmouth and North Norfolk, the percentages of second homes are 2.9%, 4.5% and 5.8% respectively (2021 census data, Office for National Statistics.) The number of vacant dwellings is also an issue, particularly in King’s Lynn and West Norfolk and North Norfolk, with figures of 6.9% and 8.9% respectively (2021 census data, Office for National Statistics.) These figures are supported by further information released by North Norfolk District Council, with 7,169 second and holiday homes as of 1 April, 2022, second homes representing 8% (4,508) of council tax paying homes, and holiday homes representing 4.5% (2,661) of all homes (council tax homes plus holiday homes liable for business rates) (‘the possible impacts of second and holiday homes in North Norfolk’, NNDC, 20 July 2022.) Some of the conclusions of this report were: “from the available evidence, it is difficult to conclude that the high number of second and holiday homes affects house prices and affordability across the district as a whole. However, there may be some local effects”, and “all towns and parishes in the district have affordable homes but proportions vary. There is no with the number of second and holiday homes” (‘the possible impacts of second and holiday homes in North Norfolk’, NNDC, 20 July 2022.)

Conclusion

The issues around affordable housing are many and complex, with no easy solutions to the question of how to ensure more are delivered. It is impossible to view affordable housing provision in isolation to a range of other objectives and factors, not least the need to deliver more housing in total, as well

as a plethora of social, economic, geographical and political factors, all of which interconnect with one another.

However, it is clear there is a real need for affordable housing, including or perhaps particularly, in rural areas. Where this is coupled with a demand for second homes and holiday lets, the question of affordability becomes more acute. If protection of valued landscapes is added to this mix, then it is even more difficult to find a way to provide much-needed social rented affordable housing, which would address the long housing waiting lists and enable local residents to remain in their home settlements.

Perhaps the most important part of the solution is for there to be real political will and action to address the key parts of the issue, at both national and local levels.

National Planning Policy needs to be amended so that developers will deliver more social rented affordable housing, for which there is the most critical need. In turn this would enable and encourage Local Planning Authorities to write Local Plan policies which do more to ensure affordable housing is delivered in the right quantities and locations. At national level this would involve greater funding and incentivization to provide affordable housing, which at present is finding itself sidelined in the pursuit of arguably unnecessarily high targets for market housing. Part of this needs to be tackling the issue of inflated costs for land for housing, which is partly why there is under-delivery of affordables. By allowing the erosion of settlement/development boundaries around villages and towns, so that some other development may be permitted, this issue will only be exacerbated rather than addressed.

While there is some good work in providing rural exception sites, affordable housing through allocated sites in Local Plans, and by community-led schemes (as recently acknowledged in the updated para. 82 of the NPPF, December 2023), this is not sufficient to meet the need for truly affordable housing across Norfolk.

National Policy should redefine what is meant by 'affordable housing', so that discounted market housing and starter homes are removed from the definition, unless these categories are clearly linked to average local incomes and not just property prices.

Clear, unambiguous and binding targets should be set for affordable housing, particularly for social rented dwellings.

Greater (government) support is required to deliver affordable housing on rural exception sites, which would enable small scale affordable housing schemes to be built on the edge of rural settlements, not least by SME builders (small and medium enterprises.) This should include policy changes at national and local level to make it easier for such sites to come forward and to make it harder for other types of development in these locations to take place, in addition to the greater provision of grant funding for rural exception sites.

Finally, restrictions on the resale of affordable housing stock across rural parishes should be extended and enforced, so that these properties continue to be occupied by local residents, and not as second or holiday homes. At present, far too much of Norfolk is not covered by these Section 157 restrictions, which could be used to prevent houses being sold under the right to buy scheme, so that properties should not be lost as lower cost rental properties for local people.

There have been many calls for action in this difficult area, with far too little progress of a wide-ranging and effective nature, while housing waiting lists remain long and the Norfolk countryside is

becoming an increasingly unaffordable location in which to live. The evidence of the need for change is clear: now is the time for decisive action.

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