

Dear Mr Wood

I have now had more time to consider your comments and my response where appropriate is shown in green for ease of reference to your email below. Since your Email, government have now issued today the Garden Communities Prospectus, link is included for your reference. Now this is published, the council will need to consider the process it is going to undertake if Lanpro wish to continue promoting their scheme.

<https://www.gov.uk/government/publications/garden-communities-prospectus>

Regards
Anna Graves

Dear Mrs Graves

Hoe and Worthing Parish Meeting was grateful to be provided with a copy of the letter below. It represented the first reliable information made publicly available after parishes had been alarmingly and suddenly informed that the submission of an application to establish up to 10,000 new homes between North Elmham, Billingford and Bintree was imminent, with only two weeks available to submit objections (sic) to the council leader although there was almost no other detail available.

There is no submission of an application to our planning committee, there is a proposal that Lanpro wants to submit to government under the emerging garden communities programme. There is no consultation period nor process to submit objections within 2 weeks. I think you were encouraged to make your views known to the leader and promptly. To be clear all that Lanpro have provided is a short promotion document with no content or evidence base.

During the ten days between receiving this extremely startling news on 11th July and your letter on 20th July our parish endeavoured to acquaint itself with as much information as possible regarding the proposal but discovered very little, in circumstances where every council officer at every level and every council member stated they had no knowledge about the matter whatsoever.

This is true, most officers are not fully appraised. I am containing this within the senior team as there is no formal proposal, and certainly no application and therefore not in my officers work programme. Myself and the leader are the main points of contact at present.

In due course, after flurried local activity we submitted a series of queries covering three broad topics to the leader of the council that were forwarded via our district councillor; in short these related to the general policy that Breckland has towards the development of garden towns in the district, the view it takes of the current matter and the manner in which the authority dealt with it after the initial approach from the developers.

We have now received a reply directly from the leader of the council which paraphrases the letter you provided, in answer to the first two issues. Neither letter makes any reference to the third issue and both give rise to a number of further queries.

Our parishioners are anxious to receive assurance that our council will deal with any approach made to them with a proposal to establish a garden town, in a manner that is transparent, accountable, in line with its own protocols and provides public confidence. In this case that confidence has not been established and some clarity would be appreciated regarding what happened during the time after the authority were approached by the developers and the date on which the news broke.

The process to date it's pretty straight forward, and I am more than happy to share all the emails that prove this sequence of events if that is necessary. This is not a Breckland Council's proposal, and it's no way near any formal planning process.

Lanpro approached the Leader during week of the 14 June, to arrange a discuss about their proposal. The Leader and I decided to meet them on site to hear what they have to say. This is pretty normal procedure for any project, planning or otherwise, when individuals want to discuss their ideas with the council. It is not normal practise for the council to share all our exploratory meetings with all parishes at this initial stage.

Lanpro invited us to a site visit on 26 June, which is the first time we met them, and they described the proposal to us and the process they had been through to date with Government. We spent the morning being driven around the site listening to what they hoped to achieve.

At the end of this site visit I suggested they write to us setting out what their expectations are from the council. They did so and I received their letter on the 3rd July...not 3 June as dated on their letter, they made a dating mistake.

I responded on the 20 July to Lanpro letter, which is what you have received, as you have set out below.

On 19th July I met Lanpro's lead Chris Leeming, to reinforce the messages the Leader and I had given on our site visit of the 26 June, which was they have to engage the local communities and ward councillors. I expressed continuing disappointment that they seem not to have understood the importance of early engagement.

They have been requesting further meetings with the council, which have been declined as at the time of the requests there was no progress from Government in releasing the new Garden Communities prospectus. Therefore my letter setting out Breckland's position remains unchanged. Now the prospectus is out I suspect we start a dialogue with Lanpro if they are pursuing the proposal.

What is currently evident from your letter is that Breckland, as the planning authority, were somehow made aware of the proposal some weeks before the letter date and that on 26th June a site meeting took place. On July 10th one of the two councillors for Upper Wensum Ward met with the developers at their request, although we were subsequently informed by the other ward member that a site meeting had been agreed, at the suggestion of the Leader of the Council, for both members to attend two weeks later. He could not account for what had taken place but indicated he was very upset. It is extremely difficult to marry up this very worrying process and sketchy information with the planning authority's normal practice for dealing with planning applications or for pre-submission advice. It also seems a considerable distance from the protocol issued to committee councillors who are lobbied by applicants and as stated we would be grateful if you could clarify what took place.

There is no planning application and there is no pre-submission advice being given. Yes we did suggest that Lanpro make the ward councillors aware of their proposal which they have done.

Notwithstanding the fact that the Council has not received any formal planning application, as you will know many developers will informally contact elected members and town and Parish Councils to seek initial views and information prior to making an informal enquiry to a planning department. The promoters have therefore simply sought to understand the initial thoughts of elected representatives as they develop their proposals.

This is a multi-million pound development, in a currently undeveloped rural area, that will exceed the objectively assessed housing need for the district by a very large margin and it is the first to be proposed in the county. The necessary housing provision through to 2036 has been calculated at 15,000 new homes

according to a well-publicised and open, step by step process that met with government guidelines and included considerable public consultation. As a result of what has happened so far in this case there is concern that the same level of openness and public involvement will not be a feature of your approach to garden town development.

We would be grateful if you would assist by clarifying the following matters.

• Our parish contributed in the various public consultations during the process of compiling the emerging local plan. That document is now in the final stage of inspection and includes the objectively assessed housing need for the district and a strategy for delivering it. You have stated that other districts in the county have engaged in the same process to produce their own local plans and so the housing need in Norfolk and its proposed method of provision is known through to 2036, along with the policies that will apply to development through to that date.

The government has stated in its earlier prospectus that it is interested in working with local authorities prepared to commit to delivery of housing over and above their objectively assessed housing need and in your letter you have indicated that Breckland District Council is prepared to do that. We would be grateful if you could tell us how and when that decision was made.

• The government stated in respect of garden towns'....it is important they are a response meeting housing need locally'. Your letter is specific in indicating a commitment to serving housing need beyond the district boundaries but it is ambiguous in terms of the geographic extent to which you would seek to satisfy that unmet housing need. As the need is now identified in each district, along with a strategy for its delivery in local plans through to 2036, are you proposing to meet housing need identified beyond the county boundary?

• You have stated that Breckland considers a county-wide discussion under The duty to Co-operate should consider whether a garden town is appropriate for Norfolk in meeting future housing need and if so where in the county it should be situated. You have invited the proposers of the current scheme to provide what evidence they can to inform such a discussion but given that it has been possible for developers to propose Garden Cities/Towns/Villages for several years why has that conversation not already taken place and a distinct policy now emerged.

• You do say that garden towns were considered as part of the emerging local plan but '...no suitable options for new settlements were identified'. What was identified in the process was that the bulk of the objectively assessed housing need would be restricted to an area within the A11 corridor, on the southern boundary of the district, while the area near the northern boundary was assessed as suitable for extremely limited development indeed. When the issue of suitable options for new settlements was discussed what view was taken of the area in the north of the district that is now being promoted?

• The prospectus issued in 2016 specifically referred in its title to 'Locally-led Garden Cities and Towns' and in the body repeated the theme by indicating they should be '...in places where communities want them'. As you have said they were considered as part of the local plan, which had extended periods of public consultation during the years of its compilation, why did those consultations not include garden towns?

• The 2016 government prospectus was cancelled last week and its replacement is yet to be published. You have informed the developers in this case that, like them, you await the issue of the next government prospectus and 'During this period of consultation, it may be possible for Breckland Council to consider more formally and with its partnership authorities how it may or may not formally support the proposal (based on what I have outlined above)'. We were entirely

unaware there was any period of consultation and would be grateful if you could explain what consultation is referred to.

This appears to be entirely at odds with the letter from the Leader of the Council which states 'Having not received any formal proposal we are not in a position to give this concept detailed consideration or to state a formal position on the project put forward by Lanpro'. It seems it must be sufficiently detailed to allow a conclusion to be reached regarding whether or not to offer your formal support as you have indicated to the developers. This is nothing short of baffling when you state that the most significant thing before the council can give an opinion is 'there should be full and extensive public engagement from the outset, with parishes, community groups and businesses to gain support and understanding'. None of those things have taken place, leaving local communities entirely in the dark and feeling ignored. As no community engagement of any kind has been attempted either by the developers or the local planning authority could you please explain if you intend nevertheless to reach a formal conclusion and whether the process will be accessible in any way to parishes.

Breckland Council's new Local Plan that is currently under independent examination sets out the preferred pattern of development, which does not include proposals for a new settlement (neither a Garden Town or village).

Any decision that might involve planning in excess of identified housing need would need to be considered in the context of any requests made for an authority to plan for unmet housing need from other areas under the Localism Act's Duty to Cooperate. Such consideration would then take place as part of the next Local Plan process. It is reminded that the current Local Plan is still in examination and therefore this is purely hypothetical at this time.

National Planning Policy expects Local Authorities to consider in setting their own housing targets any unmet need from adjoining authorities. At the present time, all Norfolk and Suffolk authorities have indicated that they intend to meet the identified housing needs within their own administrative areas or as part of established joint Local Planning arrangements (i.e. the Greater Norwich Local Plan – a joint plan covering the three areas of Broadland, Norwich City and South Norfolk).

Most garden town or village proposals would likely be identified within existing Local Plans and would already have been subject to significant public engagement. In this instance the publicised proposal has been initiated by landowners outside of the Local Plan process.

Having said all of that you can probably appreciate there is considerable concern in our parish that the high level of early public involvement in future schemes promised by the Government has not been apparent so far in this case. It is most concerning when the consistent feedback from communities close to the earliest of the 23 schemes that have now been authorised is that they felt ignored, side-lined, uninformed, told what they wanted rather than being asked and swamped by the outcome. The government professed a determination to ensure the scheme would not allow those outcomes as it moved forward and we are most anxious it does not continue to be the experience of the existing community here.

At this point we have not met to discuss the issue because of the paucity of information made available to us and have not rushed to reach precipitate and uninformed conclusions. We would be extremely grateful for any information you can supply regarding the specifics of this proposal, what we might expect to happen next and when that might happen. We would also ask that you clarify the points raised in this letter as soon as possible.

what happens next as I see it at present---and this is subject to change.

- The council needs to consider what government expects as set out in their new garden communities prospectus. This will be consider next week between the senior leadership team and the councils cabinet.
- The council could take a view formally at Full Council on how to respond to Lanpro proposal and government prospectus. To do this we need to see and understand the evidence base and deliverability of the proposal...none of which we have yet seen.
- The council will also need to determine and consider how to gather feedback from our communities, and how this sits on a proposal that sits outside of our current Local Plan strategy, which does have local community input from the outset.
- The council could consult with other local authorities on a Norfolk perspective regarding Garden Communities. The consideration of whether new freestanding settlements are a desirable response to addressing long term housing need in Norfolk merits a wider discussion with other Local Authority partners which alongside community engagement, would take place as part of the preparation of the next Local Plan.
- Supporting (or not) a speculative response to a prospectus will be a full Council decision, with all the openness and opportunity for public debate.

Yours sincerely

Trevor wood

Chairman, Hoe and Worthing Parish Meeting