

# Breckland Local Plan Examination

## **Matter 4:**

## **Housing: the supply of land for housing, deliverability and viability**

### **Breckland District Council**

### **Inspector's Questions on the Additional Work and related Proposed Modifications**

August 2018



## **The trajectory**

### **1.1 Why do the completions (2011/12 to 2016/17) in the new trajectory (provided in the Housing Topic Paper) not match those in the previous trajectory provided with the Council's hearing statement (CS.4A)?**

1. As part of the Housing Topic Paper (in accordance with the Inspectors letter dated 20<sup>th</sup> April) the Council has reviewed all of the completions contained within the Council's hearing statement (CS.4A). Through this process it was noted that some of the completions had been recorded as the gross figure rather than net. The Housing Topic Paper has sought to ensure all completions figures included are net.

### **1.2 Should sites with a resolution to grant planning permission subject to a S106 be counted towards supply? In addition and if so, should a lapse rate be applied?**

2. The Council considers that it is appropriate to include sites with a resolution to grant planning permission subject to S106 as part of the housing supply. The sites were all considered by the Council's planning committee and the resolution to grant was achieved prior to 31<sup>st</sup> March 2018. The sites are considered to represent sustainable development as shown by the resolution to grant planning permission. The sites increase the supply by 878 dwellings, with 423 coming within the first five years. The Council considers these to be deliverable sites which will come forward within the five year period.
3. Of the 878 dwellings proposed for inclusion, 787 dwellings across 5 sites also represent proposed Local Plan allocations. Through the housing trajectory these sites would be included within the housing supply on the basis that they are allocations irrespective of the fact that they now have a resolution to grant planning permission.
4. The Council does not consider it appropriate to apply a lapse rate to sites with a resolution grant planning permission. The NPPF states at footnote 11 that sites with should be considered to be deliverable until permission expires unless there is clear evidence that schemes will not be implemented within five years. Further to this a lapse rate has not been applied to Local Plan allocations, additional information in this regard is set out in response to matter 1.5.

## **Lapse rates**

### **1.3 Is a lapse rate of 10% for some large sites with planning permission justified given the Council's evidence?**

5. It is the Council's position that a 10% lapse rate is appropriate for large sites. The Housing Topic Paper at section 4 page 12 sets out the Council's evidence for the lapse rate percentage. This shows a total dwelling lapse of 12.28% since 2011, the information has taken into account all application types. However there was a spike in lapse rates on 2014/2015 when two large applications lapsed. In this year the dwelling lapse rate was 27% (it should be noted that these two sites have now come forward with new applications). As set out at paragraph 21 of the topic paper, when

this outlier is excluded the mean lapse rate is 8.6%. Having regard to the findings a 10 % lapse rate is therefore considered to be appropriate.

**1.4 Is it justified to apply a lapse rate to only some of the large sites with planning permission? Should a lapse rate be applied to all large sites, given the Council's evidence? What effect would this have on supply?**

6. It is not considered to be justified to apply a lapse rate to all sites with planning permission. As set out above the NPPF at footnote 11 considers that sites with planning permission should be considered to be deliverable unless there is clear evidence that schemes will not be implemented within five years. Through the work undertaken on the housing topic paper, the Council has contacted all landowners/developers with planning permission on a large site for confirmation of delivery intentions. Where the developer has confirmed the delivery of the site, this is as set out within the trajectory. It is considered unreasonable to further require a lapse rate to the sites which have had delivery formally confirmed by a developer, and contrary to footnote 11 of the NPPF.
7. The lapse rate has been applied to the large sites where the developer has not confirmed the delivery timescales. This approach is consistent with the approach that the Council has taken previously through five year housing land supply statements. As set out in response to issue 1.3 the 10% lapse rate is evidenced through past delivery.
8. If the Council applied a 10% lapse rate to all large sites (rather than just those who had not confirmed delivery) this would have the impact of reducing supply over the plan period for this type of site from 6,567 to 6,050.

**1.5 Should a lapse rate be included for site allocations? What effect would this have on supply?**

9. The Council do not consider it either necessary or appropriate to apply a lapse rate to site allocations. Lapse rates would typically be applied to the trajectory where there is uncertainty in relation to delivery. The NPPF sets out at paragraph 157 that Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary. All sites which are proposed to be included as site allocations within the Local Plan have been represented to the Council through a call for sites. The Council has also sought further information from the landowners to clarify deliverability and viability. The Council considers this represents sufficient evidence to view sites as deliverable without the need for a lapse rate.
10. Applying a lapse rate to all new site allocations, would have the implication of requiring the authority to plan for an above OAN housing number. This has wider implications on individual settlements, particularly in relation to Infrastructure. To apply a lapse rate would require an update to the Infrastructure Delivery Plan.

11. Further to the above, there is a potential for discontinuity if lapse rates are applied to site allocations, where they may now also be subject to a planning permission. Allocations which now also have planning permission should be assessed against the tests within footnote 11 of the NPPF.
12. The impact of applying a 10% lapse rate to the site allocations (as set out within the table on pages 45-47) would be a reduction in 397 dwellings over the plan period (not including those site allocations which now have planning permission). The approach the Council has taken in relation to large sites is to lapse the 10% from the first five years. This ensures that it is discounted from the five year housing land supply calculation. Within the first five years, there are currently 370 dwellings expected to come forward within the first five years, therefore to apply a lapse rate to all site allocations, would have the implication of removing the dwellings proposed within the next five years, plus 27 proposed within year 6 (2023/24).
13. Notwithstanding the above, the sites which were allocated previously through the Site Specifics DPD as part of the Local Development Framework (excluding those which are defined as not-superceded as part of this plan) have been developed to their full extents.

#### **Windfall allowance and Policies HOU03 & HOU04**

##### **1.6 Is having an allowance for windfall sites and sites delivered under Policies HOU03 & HOU04 justified?**

14. It is considered appropriate to include both an allowance for windfall sites and sites delivered under Policies HOU03 and HOU04 within the trajectory. The Council has undertaken a detailed windfall analysis which is shown at section 4 pages 13 and 14 of the housing topic paper. This solely looks at delivery of windfall development which has come forward inside settlement boundaries defined within Policy HOU02, whereas Policies HOU03 and HOU04 allow sites to be delivered outside of the settlement boundary. The principle of new development inside settlement boundaries is deemed to be acceptable (as they have been assessed as sustainable locations), and it is expected that delivery inside settlement boundaries would continue over the plan period. Future sources of supply of windfall sites inside settlement boundaries are set out in response to matter 1.8.
15. The analysis of historical completions shows that the total windfall development inside settlement boundaries (delivered between 2011 and 2018) is 2,021 dwellings on all sites. The mean dwelling delivery is 289 dwellings per annum. Large sites have not been included in the analysis, as it is considered less likely that major development schemes will come forward once the new Local Plan is adopted.
16. Having regard to the above, it is considered justified to include a windfall allowance alongside the dwellings coming forward through Policies HOU03 and HOU04. The Council has taken a precautionary approach to inclusion of windfalls, and whilst mean delivery is 289 dwellings per annum, has only included 50 dwellings per

annum. Furthermore to avoid double counting with sites which may already have planning permission, the windfall allowance is only applied from year 3 (202/21).

**1.7 Is the windfall allowance of 800 dwellings (50 dpa), from within settlement boundaries, over the remainder of the Plan period justified?**

17. As set out in response to matter 1.6, the Council consider a windfall allowance of 800 dwellings per annum to be justified. The housing topic paper has taken a precautionary approach to the inclusion of windfall sites within settlement boundaries with the inclusion of a lower level of dwellings than has historically been completed.

**1.8 Can similar rates of windfall development be expected in the long-term?**

18. As set out in section 4 of the housing topic paper, the windfall analysis has taken into account historical delivery of dwellings in settlements. The trends in these locations show that windfall sites have consistently come forward inside the settlement boundary. The analysis was undertaken using the existing settlement boundaries, these have been reviewed as part of the Local Plan which has led in a number of places to their expansion due to approved planning permissions. By using the existing settlement boundaries the analysis does not include any past permissions which have been granted outside of the settlement boundary on the basis of a lack of five year housing land supply.
19. Locations which have retained a settlement boundary have been assessed as sustainable locations which have services and facilities to support development. There are no policies within the Local Plan which would prevent windfall development coming forward inside the settlement boundary. Furthermore, future sources of supply inside settlement boundaries include infill development, redevelopment of previously developed sites and also changes of use.
20. As set out in response to matter 1.6 the Council has taken a cautious approach to windfall. Whilst the evidence shows that on average 289 dwellings are being granted inside settlement boundaries since the start of the plan period, going forward the Council is only proposing to include 50 dwellings per annum included from 2020/21 to avoid any double counting from sites which already have planning permission.

**1.9 Is the assumed contribution in the trajectory from Policies HOU03 & HOU04 justified? In addition, should a lapse rate be applied?**

21. Policy HOU03 allows for development to come forward #\within the Local Service Centre villages where site allocations were not identified. The approach ensures the proportional distribution of housing growth within Local Service Centres, as set out within Policy HOU02. The Council considers the approach of including a contribution from Policy HOU03 to be justified as set out in matter 5.8 of the Councils matter statement (CS.5). Meanwhile, Policy HOU04 includes an allowance for development coming forward in villages with settlement boundaries on land directly adjacent to the settlement boundary. The Council consider the policy to be justified, as set out within the Councils response to matter 5.11 (CS.5)

22. The trajectory has sought to distribute the delivery of dwellings from Policies HOU 03 and HOU04 evenly over the plan period. In order to allow sites to be delivered against the requirements of these policies completions are only included in the trajectory from year 3 (2020/21).
23. Policies HOU03 and HOU04 include an allowance for 325 dwellings, this equates to 2% of the OAN over the plan period. Having regard to this, the assumed contribution is considered to be minimal. The Council do not consider it necessary to apply a lapse rate to the delivery from Policies HOU03 and HOU04. The Council has historically seen good levels of delivery on smaller sites in Breckland. As set out on page 19 of the housing topic paper, on average 152 dwellings are completed per annum on small sites. Taking into account both the delivery of dwellings from Policies HOU03 and HOU04 and the windfall allowance, these two sources of supply will account for less than 50% of the delivery that the Council is currently seeing on small windfall sites. This has already had the same impact as applying a higher lapse rate to these sources of supply.

### **Five year housing land supply**

#### **1.10 Is calculating the shortfall based on the stepped trajectory and Liverpool method justified?**

24. Through the housing topic paper (at pages 20 and 21) the Council has presented four methods for the calculation of the five year land supply. It is considered that the use of both a stepped trajectory and the Liverpool methodology is justified when having regard to the scale and type of development advocated through the Local Plan. Using the stepped housing trajectory and the Liverpool methodology for dealing with housing shortfall, the Council is able to 6.36 years supply of deliverable housing land, this is 1,035 houses above the five year land supply requirement.
25. Going forward the supply of housing land is considered to be an ambitious target. The five year housing trajectory (included within the housing topic paper on page 19) shows delivery rates of over 1,000 dwellings from 2020/21. Since 2001 the highest delivery rates the Council has seen within an individual year is 884 dwellings in 2003/4. Whilst the Council has sought to verify all sources of supply, as set out within the responses to the earlier questions, this still represents a step change in the delivery levels previously seen within Breckland.
26. Through the Local Plan the Council is proposing for 50% of its land supply to be delivered within Attleborough and Thetford over the plan period, 44% of this supply remains to be delivered within the two towns on two strategic urban extensions. Strategic sites tend to take longer to commence and deliver, and in Breckland these are not scheduled to commence delivering dwellings until 2019/20 in regard to Thetford and 2020/21 for Attleborough. Further to this, the higher delivery rates for these sites when the Council expects more than 1 developer to be building out the site, is not expected until 2022/23 and 2023/24 respectively.

27. Having regard to the above paragraphs, considering both the past delivery rates and the future delivery rates, the use of both the stepped trajectory and the Liverpool method for calculating the five year land supply is considered to be justified.

**1.11 The Council suggest that they can demonstrate a five year housing land supply without a stepped trajectory and by addressing the shortfall via the Sedgefield method? On this basis, is a stepped trajectory and the use of the Liverpool method in the Plan justified?**

28. It is acknowledged that the housing topic paper concludes that a five year supply can be achieved without the stepped trajectory and with the Sedgefield methodology. The housing land supply which is achieved is 5.24 years. This is only 220 dwellings over the five year land supply requirement. If the additional lapse rates as discussed were to be applied to the supply, the Council would not be able to demonstrate a five year housing land supply. In order to achieve this level of supply, the Council is already having to allocate above the objectively assessed housing need. In order to achieve a five year land supply using the objectively assessed need and the Sedgefield methodology, housing delivery will need to be higher than has been historical achieved (since 2001) in Breckland, in four of the next five years.
29. As set out in response to the previous question the Council consider the use of a stepped trajectory and the Liverpool methodology to be justified having regard to they type and scale of development proposed within Breckland. With a stepped trajectory and the Liverpool methodology the Council is able to demonstrate a 6.36 year land supply. Furthermore, as set out previously within the Councils hearing statements. It is acknowledged that the Planning Practice Guidance includes a preference for the use of the Sedgefield methodology. However the use of the words 'where possible' within the PPG when referring to the Sedgefield approach clearly indicate that there are circumstances where this would not apply. This was considered at the Lichfield Local Plan examination and has been considered through section 78 appeal decisions upheld by the Secretary of State (APP/K3415/A/14/2225799). Further to this, authorities including Basingstoke, Gloucester, Cheltenham and Tewkesbury, High Peak and Lewes have all successfully adopted this method as the most appropriate solution to local circumstances.

**Sites**

**1.12 Does the evidence provided in the topic paper justify the Council's view that the Attleborough and Thetford Strategic Urban Extensions can feasibly deliver up to 250 dpa over a sustained period of time?**

30. The housing trajectory for the sustainable urban extensions within the housing topic paper have been confirmed by the land owners. In relation to Thetford this is through the Statement of Common Ground. For Attleborough, the Council has worked closely

with the land promoter as part of the examination and they have confirmed an updated trajectory.

31. The Councils view is that the evidence provided within the housing topic paper is suitably robust to justify up to 250 dwellings being delivered per annum on the Thetford and Attleborough SUE's. Whilst this level of delivery hasn't occurred previously within Breckland, the two SUE's are intended to provide a step change to delivery of housing within the District. The Council has also provided evidence from adjoining Local Authorities which show that this scale of development can and has occurred in Norfolk. Furthermore, the evidence shows that multiple developers can deliver schemes concurrently.

**1.13 Is the trajectory of delivery for each site (Appendix A of the Housing Topic Paper), including the Plan's site allocations, justified?**

32. The Council consider the trajectories for the delivery of individual sites (including site allocation) as set out at Appendix A to be justified. Evidence to confirm delivery has been sought. Regard has also been had to typical delivery timescales on sites in Breckland, and industry standards.
33. In relation to the individual elements of the supply evidence has included:
- Large sites – the council has sought to confirm delivery with the individual landowners/ developers through email and telephone. The trajectories presented represent the result of these responses. Where delivery has not been confirmed the Council has considered any earlier evidence (i.e. past five year land supply statements) and applied a 10% lapse rate.
  - Small sites – as set out paragraph 39 of the housing topic paper a 10% lapse rate has been applied across all sites.
  - Sites with a resolution to grant planning permission – the trajectory has had regard to information submitted with the planning application and also where they are proposed Local Plan allocations information from deliverability forms.
  - Not-superseded allocations – information has had regard to past delivery rates in Breckland and likely start dates for the development. Where possible delivery has been confirmed via the landowner.
  - Local plan allocations – where sites are proposed for allocation, the Council has sought information from the deliverability forms which considered timescales, build out rates and any viability constraints.
  - Policies HOU03 and HOU04 – This is as set out in response to matter 1.9
  - Windfall – This is as set out in response to matter 1.7



### **1.14 Is it appropriate to include a contribution from not superseded Site SW1 of the Site Specific Policies and Proposals Development Plan Document?**

34. It is considered appropriate to include a contribution from site SW1 as it is proposed as a not-superseded allocation. The majority of site SW1 now has planning permission and has been developed by Abel Homes. The remainder of the SW1 allocation is for 97 dwellings. The site is subject to a current planning application from Abel Homes (3PL/2017/1351/F) which received a resolution to grant on 4<sup>th</sup> June 2018. Having regard to the existing planning application resolution and that the application is a regional housebuilder it is considered that this represents a developable site which should provide the appropriate contribution.

### **Local service centres**

### **1.15 Is the methodology for calculating the 10% growth for Local Service Centres justified?**

35. The Council's Housing Topic Paper (EX 79) sets out the methodology for calculating the 10% growth for Local Service Centres. Paragraph 51 of the topic paper sets out that *"each settlement will see new allocations at a level broadly equivalent to a 10% growth of the estimated number of dwellings at the start of the plan period (2011), adjusted downwards to ensure that the overall level of development remains within the overall 15% target for Local Service Centres"*. Table 20 within the Housing Topic Paper illustrates this figure in the column 'proposed allocation within the local plan'.
36. The figures as set out within the column 'proposed allocation within the local plan' in Table 20 are reflected in Table 2.1 of the Preferred Site Options and Settlement Boundaries consultation (LP/S/12). The figure set out in table 2.1 is then reflected within the relevant section for each settlement in the Preferred Site Options and Settlement Boundaries document. These figures were considered the starting point for the proposed allocations and completions and commitments from 2011 were considered on top of any allocation. Between the Preferred Site Options and Settlement Boundaries consultation and the Pre-Submission Publication additional completions and commitments were then removed from the target figure.
37. Taking Ashill as an example, Table 20 of the Council's Housing Topic Paper sets out that 50 dwellings are set out within the 'proposed allocation within the plan' column. This is reflected in Table 2.1 of the Preferred Site Options and Settlement Boundaries consultation (LP/S/12), which states that the new allocations figure for Ashill is 50 dwellings. Within the Ashill section on page 51 of the Preferred Site Options and Settlement Boundaries document it is set out that an additional 90 dwellings are required over the plan period, consisting of 50 dwellings through new allocation, 37 commitments and 3 completions. Within the Pre-submission publication it is then stated that an additional 90 dwellings are required over the plan period consisting of 22 completions, 49 commitments and 20 through new allocation. This ensures that the original 10% calculation published in the Preferred Sites and Settlement Boundaries consultation is not exceeded from that point in time. Completions and commitments in the monitoring year 2017/18 have been reflected through the Council's main modifications.

38. The Council's methodology for calculating the 10% growth for Local Service Centres is considered to be robust and is justified. The calculation for the broadly equivalent growth of 10% is applied to each Local Service Centre within the District.

**1.16 Are the reductions to ensure the 15% overall target from Local Service Centres is not exceeded, proportionately applied depending on the settlement size?**

39. The reductions to ensure the 10% growth to each settlement did not exceed 15% in the overall target are applied to all local service centres regardless of settlement size. Due to the initial rounding up to the nearest 5 and 10 it was considered that the blanket reduction would not have a significant impact upon the proportionality of the reduction. It was also seen to be important to treat all Local Service Centres equally and this approach was agreed at the public meeting of the Local Plan Working Group meeting of 11<sup>th</sup> July 2016.

**Policy HOU02**

**1.17 Should Policy HOU02 reflect the trajectory in terms of lapse rates applied for large and small sites and the windfall allowance?**

40. Policy HOU 02 sets out the level and location of growth, essentially setting out the Council's hierarchy and the individual settlement targets. The policy provides a factual account of the number of completions and commitments and sets out the proposed allocation for each settlement.
41. Applying a lapse rate to all new site allocations, would have the implication of requiring the authority to plan for an above OAN housing number. This has wider implications on individual settlements, particularly in relation to Infrastructure. To apply a lapse rate would require an update to the Infrastructure Delivery Plan.
42. Further to the above, there is a potential for discontinuity if lapse rates are applied to site allocations, where they may now also be subject to a planning permission. Allocations which now also have planning permission should be assessed against the tests within footnote 11 of the NPPF.
43. Policy HOU 02 seeks to set out the allocations and where development will be focused. The function and role of the trajectory is to ensure that the Council has enough deliverable sites to meet the Objectively Assessed Need throughout the plan period. The two have a different function and it is not considered appropriate to reflect the lapse rates in Policy HOU 02.

### **1.18 Why has the % growth column been removed from revised Policy HOU 02?**

44. Appendix C of HOU 02 illustrates the figures set out in Policy HOU 02 of the Local Plan (LP/S/1) and how this has changed following further completions and commitments. Appendix 1 of this Matters statement provides a version of Policy HOU 02 that will supersede the version set out in the Local Plan. It is proposed that this modification will be added to the Council's Table of Main Modifications.

### **1.19 Why have villages without boundaries now been included in Policy HOU02?**

45. There was an error with Policy HOU 02 as set out in the Submission version of the Local Plan (LP/S/1), the figure for 902 completions and commitments included villages with boundaries and villages without boundaries. The proposed version of Policy HOU 02 splits this into villages with boundaries and villages without boundaries in order to correct this error and also to provide more clarity as to the overall distribution and level of growth within the district.

### **1.20 The revised figures in Policy HOU02 result in the overall number of dwellings to be delivered in Dereham and Watton being over the sought target. What are the implications of this and is it justified?**

46. Appendix 1 of this Matters Statement provides the most up to date version of HOU 02 with the Percentage of Growth figures included. This illustrates that 48% of the growth is directed towards the Key Settlements, 30% towards the Market Towns, 14% towards the Local Service Centres and 8% to the Villages with and without Boundaries. This has altered slightly from the Submission version of the plan (LP/S/1), which indicated that 50% would be directed towards to the Key Settlements, 28% to the Market Towns and 15% to the Local Service Centres and 7% to the Villages with Boundaries.
47. This change in the percentage split is due to the number of recent planning approvals across the District. Due to the number of recent planning approvals specifically in the Market Towns of Dereham and Watton, the number of dwellings to be delivered in these locations does now exceed the targets sought. In sustainability terms, the Market Towns, alongside the Key Settlements of Attleborough and Thetford, represent the most sustainable locations within the District. It should also be noted that although the percentages have changed for each tier of the hierarchy the development proposed towards the most sustainable settlements, the Market Towns and the Key settlements, remains at 78% and the development proposed within the Local Service Centres and smaller villages remains at 22%.
48. As set out in the Council's response to the Matter 5 statement, Policy HOU 02 has been developed in conjunction with Policy GEN 03 'Settlement Hierarchy'. Policy GEN 03 emerged from the Issues and Options consultation (LP/S/6), which asked the question 'what options should the spatial strategy for the district consider?' Four options were posed for consideration: A focused development pattern; a dispersed/scattered development pattern; a balanced development pattern and

development of a new settlement or upgrading an existing settlement. The Preferred Directions consultation (LP/S/8) reported that the majority of respondents were in favour of a balanced development pattern across the district. This approach is supported by Sustainability Appraisal (LP/S/3, Page 157) which indicates that the distribution proposed scores more positively than the alternative options proposed.

49. Further development in the Market Towns would not have an impact upon the overall balanced development pattern across the District; the majority of development is still directed towards the Key Settlements and Market Towns with a consistent amount of development guided towards the Local Service Centres and the smaller villages. The increased planning approvals in Dereham and Watton, although exceeding the target proposed, would still reflect the balanced approach and guide development towards the most sustainable settlements within the District.

### **1.21 Do the revised figures in Policy HOU02 have any implications for Policies HOU 04 and HOU 05 of the Plan, in terms of need?**

50. HOU 02 as set out within the Submission version of the Local Plan (LP/S/1) set out that there were 902 completions and commitments as of March 2017 within Villages with Boundaries. As set out in the response to question 1.19 this figure included completions and commitments for Villages without Boundaries as well as Villages with Boundaries. An allowance for 150 dwellings through Policy HOU 04 was also added. The updated figures included within Appendix 1 of this Matters Statement set out that 1007 dwellings are now included within the completions and commitments figures and that 234 dwellings will now come forward through Policy HOU 04.
51. Policy HOU 04 seeks to reflect the Council's Vision to ensure that 'the wider rural area will have development in a sustainable manner appropriate for the rural nature of the District', and to allow for small scale growth in these locations, subject to the criteria within the policy being met. The policy seeks to allow for 5% growth to each of the settlements within the hierarchy of Villages with Boundaries. The Council has set out a methodology for the policy which is contained within the Housing Topic Paper (EX.79, page 27). This methodology sets out that the proposed 5% of growth for each settlement is from the adoption of the plan. The policy and the methodology seek to ensure that the approach is consistent across all settlements within this tier of the hierarchy. The intention of the 5% being from the adoption date of the plan is to ensure that development can come forward organically throughout the plan period. In light of this the increase in completions and commitments as set out within Policy HOU 02 does not have any implications on the need set out within Policy HOU 04 and the supporting methodology.
52. Policy HOU 05 proposes to allow for small scale development within the smallest settlements in the District, subject to the criteria within the policy being met. Development within these settlements is anticipated to occur organically throughout the plan period. It should be noted that 24 Villages without Boundaries as defined in Policy HOU 02 currently have settlement boundaries within the context of the

currently adopted Core Strategy (LP/D/1). Once the Local Plan is adopted it would be expected that less development will come forward within these locations. In light of this, the increase in completions and commitments as set out within Policy HOU 02 does not have any implications on the need set out within Policy HOU 05.

53. It is the position of the Council that the revised changes to Policy HOU 02 do not have any implications for Policies HOU 04 and HOU 05 in terms of need.

## **Infrastructure**

### **1.22 Are the projected completions in the revised trajectory based on a sound assessment of infrastructure requirements and their deliverability?**

54. The Housing Topic Paper (EX.79) Appendix B sets out a series of tables showing a break down of anticipated annual delivery for each site allocation, which aligns with the anticipated provision of infrastructure (where this is known).
55. For the two Strategic Urban Extensions (SUE's) in Attleborough and Thetford, an understanding of infrastructure requirements and estimated delivery of housing has been based on joint working with the developers, utilising both evidence produced by the Council and summarised in the IDP and their own commissioned infrastructure reports and cost estimates (in the case of Attleborough SUE, to inform the outline planning application). The trajectories have been informed and refined through consultation with infrastructure providers to provide a realistic timescale for development, throughout the production of the Local Plan and respective planning applications. The resulting detailed tables in Appendix B for Attleborough and Thetford present the most robust, up to date position of infrastructure requirements and projected delivery rates, reflecting recent continued joint working and building on earlier information presented in the IDP.
56. The trajectories for remaining site allocations in the plan have been informed, in part through a consideration of the collective impact on local infrastructure, where capacity issues or required infrastructure upgrades have been identified in the Infrastructure Delivery Plan (IDP). Trajectories have also been informed by information provided by the landowner/developer of each site and through consideration of historic build out rates and any unique site constraints. A number of the sites in Dereham have been subject to a planning application, the infrastructure capacity has been considered through this process alongside the Local Plan.
57. In conclusion, the revised trajectory has been informed by a detailed and sound consideration of infrastructure requirements and deliverability.

### **1.23 Does the projected increase in dwellings (as a result of recent planning permissions outside of the Plan making process) for Dereham and Watton have any significant infrastructure implications?**

58. As set out in The Housing Topic Paper (EX.79) paragraph 45, page 22, the increase in dwellings for Dereham and Watton is not considered to have substantive implications on infrastructure capacity above the constraints already noted in the Infrastructure Delivery Plan (IDP). The Local Plan can only address the impact of planned development, taking into account existing planning commitments.
59. Policy clauses in relation to the known infrastructure constraints have been proposed for all sites in Dereham and Watton. For example a clause on highways improvements have been proposed for all allocations in Dereham and utilities (wastewater treatment), have been proposed for all allocations in Dereham and Watton. Norfolk County Council have provided an updated position on schools (Appendix B, Housing Topic Paper), acknowledging that in both Dereham and Watton, school provision is currently under review which is a reflection of the increase in planning permissions in both towns, outside the Local Plan process. The main impact of further housing sites coming forward is the effect on phasing of development, as critical capacity issues require to be addressed prior to the delivery of all housing sites. This has been considered in the phasing of housing sites in the trajectory, and can be secured by planning conditions dependant on the speed at which the housing sites come forward.
60. The Council work cooperatively with infrastructure providers, and hold biannual meetings with representatives of all relevant departments in Norfolk County Council (most recently 11<sup>th</sup> July 2018) to provide an update on the plan process and to highlight any implications on infrastructure provision. The Council have invited comments from infrastructure providers including Norfolk County Council and Anglian Water on the increased numbers over the plan period in the two towns, and no additional concerns have been raised. It should be acknowledged that housing coming forward outside the plan process is less predictable in the Councils current status of not demonstrating a 5 year supply of housing land, but this should be rectified once the Plan is adopted (subject to successful examination).

#### **1.24 Why is the Council seeking to update the Infrastructure Delivery Plan in November 2018? Will this have any implications for the Plan?**

61. The Infrastructure Delivery Plan (IDP) is a 'living document' meaning that it is to be continuously updated. As set out in the Executive Summary of the IDP: *"The IDP is intended to be a living document which reflects the current stage of the Local Plan and costed according to the latest available data. It seeks to provide the most accurate picture of current infrastructure requirements and costs"*.
62. Following the conclusion of the Local Plan, the IDP remains a key part of the evidence which becomes a reference point for both officers and landowners/developers in consideration of the infrastructure required to support the delivery of site allocations. Whilst the IDP initially informs policy criteria which is set in the Local Plan, it also highlights capacity constraints, funding sources, expected delivery mechanisms and costs which continuously change irrespective of the stage of production of the Local Plan.

63. As it is a living document it can cite the most relevant, up to date evidence to support appropriate infrastructure solutions. Taking, as an example, the Dereham Transport Study. Should subsequent additional transport evidence either add to, or even supersede the original study, the IDP can present an up to date guide to the latest evidence, costs and requirements of transport solutions for Dereham.
64. The infrastructure requirements at this point in time are considered to have been identified and presented in the IDP through a robust process of evidence gathering and consultation with infrastructure providers. The information gathered supports policy criteria in the plan, relating to infrastructure requirements. However, further work during the Examination has resulted in some areas becoming out of date, for example the trajectories and infrastructure tables for Attleborough and Thetford SUE and information related to costings in Table 10 of the IDP. Additionally, further consultation with Norfolk County Council has occurred to inform the information presented in the Housing Topic Paper, and the successful HIF funding bid was received following submission of the evidence to support the Local Plan, and therefore these elements are not recorded in the IDP.
65. The Council intended to undertake a factual update of the IDP in November (subject to resource implications) as this presents an annual review of the document. This timescale is not set formally by the Council. Any update to the IDP would be a factual update and would not change the underpinning evidence or result in the need for alterations to policy criterion. Therefore, it is not considered to have implications on the Examination of the Local Plan. However, should the Inspector consider the timing of the update to present any risk to the process of Examination, the Council will take guidance from the Inspector as to how to proceed.
66. In summary, the IDP is required to be continuously updated in order to ensure the effective delivery of allocations in the Local Plan. The timing of any update is not formally set and the nature of any update is intended to be factual.

### **Banham Site Assessment - LP[003]013 Land to the west of Grove Road**

#### **1.25 Is the assessment undertaken for the site LP[003]013 Land to the west of Grove Road and its findings robust?**

67. The result of the site assessment for site LP[003]013 Land to the west of Grove Road can be viewed in the document EX.81. The Council have assessed the site in accordance with the Site Selection Topic Paper methodology (LP/H/4) which follows a five stage process considering: site selection, sustainability appraisal, site assessment, consultation feedback and site specific issues. The Council considers this to be a robust assessment of the site and is consistent with the assessment process for all other sites submitted for consideration in the Local Plan.
68. Due to time limitations it has not been appropriate to subject the site to a full consultation. Comments were specifically invited from Norfolk County Council as Highways Authority and as Lead Local Flood Authority and from Historic England to

inform the Historic Characterisation Assessment. These consultees were specifically identified as a result of the initial site assessment and identified potential site specific issues. This represents the main limitation of the assessment process in comparison to other sites put forward through the Local Plan process, as not everyone with an interest in the site would have been able to provide a comment. However, the document EX.81 has now been subject to consultation, and should a modification be recommended to allocate the site, this would form part of a future consultation on main modifications.

69. The conclusion of the site assessment (page 10) provides a factual statement of the findings of the assessment. This is considered to be objective and robust as it based on available evidence.
70. On the basis of the assessment, the Council maintains that land off Gaymer Close LP[003]009 in combination with land to the east of Greyhound Lane LP[003]012 are the most appropriate options given the reasonable alternatives for the reasons provided in the Councils Matter 14 statement and at the hearing session:

*“56. The three allocations are considered to be the most appropriate site options within the village for development. This option will also deliver benefits to the community in the form of improved quality open space. They are well related to existing services and facilities and score well against the sustainability appraisal criteria. The results of the sustainability appraisal on the sites can be seen in LP/S/3 pages 437-439”.*

Council’s response to Matter 14, question 14.14, page 14



**Appendix 1 : HOU 02 for insertion within the Local Plan**

Tier of Hierarchy	Settlement	Current figures (01/04/2011 – 31/03/2018)						
		Percentage of Growth	Total completions 01/04/2011 to 31/03/2018	Total commitments 01/04/2011 to 31/03/2018	Allocations not superseded	Decisions awaiting s106	Proposed allocation	Total
Key Settlements	Attleborough	48%	515	1180		8 (Warrens Lane 3PL/2016/0486/H)	2680	4383
	Thetford		323	3343			0	3666
Market Towns	Dereham	30%	401	359	220 (D2)	48 (Greenfields Road: 3PL/2016/0952/O) 216 (Land off Swanton Road: 3PL/2015/1487/O)	540 (216 have decision to grant)	1784
	Swaffham		496	360	97 (SW1)	185 (South of Norwich Road: 3PL/2015/0917/O) 165 (north of Norwich road: 3PL/2015/0550/O) 175 (west of Watton Road: 3PL/2016/0068/O)	75 (525 have decision to grant)	1553
	Watton		548	883			205	1636
Local Service Centres	Ashill	14%	39	39		7 (Hale Road 3PL/2017/1077/O)	20	105
	Banham		17	58			42	117
	Bawdeswell		8	41			0 (40 included within completions and commitments)	49
	Garboldisham		10	5			35	50
	Great Ellingham		36	159			0	195
	Harling		126	39			85	250
	Hockering		6	67			25	98
	Kenninghall**		27	4			35 (20 to be delivered through HOU 03)	66
	Litcham**		3	7			22 (22 to be delivered through HOU 03)	32
	Mattishall**		26	111			12 (Kensington Forge: 3PL/2017/1112/F)	0

	Narborough		92	18		10 (Land north of 1-14 Swaffham Rd: 3PL/2017/1046/O)	40	160
	Necton**		80	124		46 (Erne Farm: 3PL/2016/0983/O)	33 (46 have decision to grant) (18 to be met through HOU 03)	283
	North Elmham**		12	69			14 (27 included in completions and commitments) (14 to be met through HOU 03)	95
	Old Buckenham**		17	19			37 (17 to be met through HOU 03)	73
	Shipdham		75	152			55 (23 dwellings included in completions and commitments)	282
	Sporle		19	18			35	72
	Swanton Morley		84	15			85	184
	Weeting		41	60			0	101
<b>Villages with Boundaries</b>	Beeston, Beetley, Carbrooke, Caston, Gressenhall, Griston, Hockham, Lyng, Mundford, North Lopham, Rocklands, Saham Toney, Thompson, Weasenham, Shropham, Eccles Road (Quidenham), Yaxham (including Clint Green).		206	268*	0	0	234	
<b>Villages without boundaries</b>	Beachamwell, Besthorpe, Billingford, Bintree, Blo Norton, Bradenham, Bridgham, Brettenham, Brisley, Bylaugh, Cockley Cley, Colkirk, Cranwich, Cranworth, Croxton, Didlington, East Tuddenham, Elsing, Foulden, Foxley, Fransham, Garvestone, Gateley, Gooderstone, Great Cressingham, Great Dunham, Guist, Hardingham, Hilborough, Hoe, Holme Hale, Horningtoft, Ickburgh, Kempstone, Kilverstone, Lexham, Lt Cressingham, Lt Dunham, Lt Ellingham, Longham, Lynford, Merton, Mileham, Narford, New Buckenham, Newton, North Pickenham, North Tuddenham, Ovington, oxborough, Riddlesworth, Roudham, Rougham, Scarning, Scoulton, Snetterton, South Acre, South Lopham, South Pickenham, Sparham, Stanfield, Stanford, Stow Bedon, Sturston, Thompson, Tittleshall, Tottington, Twyford, , Wellingham, Wendling, Whinburgh, Whissonsett, Wretham	8%	286	247	0	6 (Land off Bridge Street: 3PL/2017/1500/O)	0	1247
<b>Total</b>		<b>100%</b>	<b>3493</b>	<b>7645</b>	<b>317</b>	<b>878</b>	<b>4297</b>	<b>16,630 (8.7% buffer)</b>